

4. During the spring semester of my freshman year at High Point University, I pledged the local fraternity chapter of Delta Sigma Phi Fraternity, Inc. (“Delta Sigma Phi” or “Delta Sig”).

5. There were approximately nine other High Point University students in my pledge class, including Michael Qubein.

6. During the pledging process, I was exposed to illicit drug use, had my personal property stolen, and was subjected to various forms of hazing.

7. Pledges in my pledge class were pressured by Delta Sig members to use hard drugs, including cocaine, with Delta Sig members. As a result of the pressure and encouragement they received from Delta Sig members, some of the pledges in my pledge class began using illegal drugs with Delta Sig members, and some developed drug addictions. One on occasion, one of the pledge masters did so many drugs that he passed out in his dorm room for a couple of days. I brought up the incident and my concerns about it to my pledge brothers and my big brother at Delta Sigma Phi, but they did not appear to share the same level of concern as I did.

8. I was taught as a pledge that it was part of the Delta Sigma Phi culture not to drink any punch at Delta Sigma Phi parties. I heard rumors that this was because Delta Sig members would spike the punch with Roofies (Rohypnol), Xanax (Alprazolam), or Everclear, a grain alcohol beverage containing a high concentration of ethanol, and serve it to unsuspecting females attending Delta Sigma Phi parties.

9. I had money and other personal belonging stolen from me during the pledging process, and I suspected at the time that Delta Sig members had stolen those items.

10. On one occasion when I left the Delta Sigma Phi house to go to dinner with my pledge class and Delta Sig members, upon my return I found some of my money missing.
11. Another time, I left my car keys in the Delta Sigma Phi house before I left for a pledge event. When I returned, I found all of the belongings left in my car had been stolen.
12. I brought up both incidents to Delta Sig members, but no one from Delta Sigma Phi did anything about either incident.
13. I was severely hazed as a Delta Sigma Phi pledge.
14. During one hazing incident, the Delta Sig members made me and the other pledges stand around a kiddie pool lined with a garbage bag in the basement of the fraternity house. The Delta Sig members then ordered us to drink warm corn whisky until we vomited so much we filled the kiddie pool with our vomit.
15. During another hazing incident at the fraternity house, Delta Sig members put a hood over my head, told me, "This will break you down and build you back up," and then hit me all over my body.
16. As a result of this incident, I suffered an injury to my right shin, which in retrospect I believe may have been fractured by the blows I received from the Delta Sig members. The injury still causes me pain to this day.
17. The hazing I experienced at Delta Sigma Phi took a physical and emotional toll on me. I was sleep deprived, I was unable to focus on my studies at High Point University, and I became anxious and depressed. I believe that I am still suffering certain emotional and psychological effects from the hazing I endured as a Delta Sigma Phi pledge.
18. After the incident in which I was hooded and hit all over my body by Delta Sig members, I reported the hazing and other misconduct to High Point University administration,

including High Point University's Senior Vice President for Student Life, Gail Tuttle, and the national office of Delta Sigma Phi. I believe I also sent an email about the hazing and misconduct to High Point University's president, Nido Qubein, who is the father of Michael Qubein, and who I understood was also an honorary member of Delta Sigma Phi.

19. A representative from the national office of Delta Sigma Phi came from DeLand, Florida to meet with me at High Point a day or two after I made my report to Delta Sigma Phi's national office. I do not recall the representative's name or official title with Delta Sigma Phi. He was a white male who appeared to be in his mid-to-late 20s.

20. I met with the national Delta Sigma Phi representative for approximately 30 to 40 minutes. During our meeting, I told him about the hazing and other misconduct I had experienced and witnessed as a Delta Sigma Phi pledge, as detailed above, including the illegal drug use I witnessed, the theft of my personal belongings, and the forced drinking and physical hazing I was subjected to.

21. After my meeting with the representative from Delta Sigma Phi's national office, I did not hear anything further from the national office about my complaint, even though the representative had told me during our meeting that Delta Sigma Phi took my complaint "very seriously."

22. I was, however, immediately dropped as a pledge by the High Point University chapter of Delta Sigma Phi, and it was my impression based on Delta Sigma Phi's activities on or around campus after I made my complaint, that the chapter was not sanctioned or punished as a result of my complaint.

23. After my meeting with the national office's representative, I posted something on Facebook, along with a picture of Delta Sigma Phi's official Greek letters, in which I expressed

my displeasure with the activities that were taking place at Delta Sigma Phi's High Point University chapter. Shortly after I made this Facebook post, I was contacted by Gail Tuttle, High Point University's Senior Vice President for Student Life. Ms. Tuttle told me the national office was upset about my Facebook post and asked me to remove it. I deleted the Facebook post shortly after speaking with Ms. Tuttle.

24. Ms. Tuttle also referred me to a school counselor to discuss the effects the hazing I experienced at Delta Sigma Phi had had on me. However, High Point University never notified me of any official action the University took as to Delta Sigma Phi as a result of my complaint.

25. Delta Sig members stopped talking with me after I was dropped from Delta Sigma Phi's pledge class.

26. Sometime later while I remained a student at High Point University, I attended a party that Delta Sig members were also attending. The Delta Sigs and female students they were with shouted that I was "a pussy," and chastised me for reporting Delta Sigma Phi for hazing.

27. During my time as a student at High Point University, Delta Sigma Phi was seen by many in the student body, including myself, as having been given a special pass or special preference to do things that other fraternities were not permitted to do. In fact, it was my impression that there was a general sense among the student body that Delta Sigma Phi got away with a lot of things because its members knew that nothing would happen to them if they violated High Point University rules.