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Are Schools Abusing Interim Suspensions?

Lately, we at Fraternal Law Partners have noticed a troubling trend. Public colleges and universities seem increasingly willing to impose interim suspensions on fraternities and sororities without providing any justification or a timeframe for an investigation. This raises the question of how long a university can impose interim sanctions on a student group before it violates the chapter's rights to freedom of association and due process.

As a hypothetical, suppose that the Alpha Alpha Alpha fraternity chapter at Public University receives a cease and desist letter from the university's Office of Judicial Affairs. The letter reads as follows:

> "The Office of Judicial Affairs received an anonymous complaint that the Alpha Alpha Alpha Fraternity may have violated a university rule. As a result, our office will begin an investigation into the matter. Until our investigation is complete, the Alpha Alpha Alpha Chapter is hereby ordered to cease and desist from conducting any and all chapter activities including but not limited to meetings, social events, philanthropy events, educational programming, and recruitment."

Aside from this letter, the university refuses to provide the chapter with any information from the complaint, any explanation of what university rules the chapter is suspected of violating, or any timeline on how the investigation will unfold. The chapter plans to elect new officers next week, and has also scheduled its major philanthropy event for just a few weeks later. Neither of these would be allowed to take place under the University's cease and desist letter.

This hypothetical fact pattern sets up a conflict between competing rights of the chapter and of the university. There is no dispute that fraternity and sorority chapters have the right to freedom of association under the First Amendment.[1] There is also no dispute that public institutions cannot deprive chapters of their constitutional rights without providing due process.[2] Furthermore, it is undisputed that educational institutions have a right to impose interim suspensions prior to a hearing.[3]

The seminal case on due process in the educational disciplinary context is *Goss v. Lopez*, a U.S. Supreme Court case from 1975.[4] While *Goss* involved a K-12 institution, courts have applied it to the higher education setting numerous times over the last four decades.[5] The *Goss* Court held:

> "[w]e do not believe that school authorities must be totally free from notice and hearing requirements if their schools are to operate with acceptable efficiency. Students facing temporary suspensions have interests qualifying for protection of the Due Process Clause, and due process requires . . . that the student be given oral or written notice of the charges against him **and, if he denies them, an explanation of the evidence the authorities have and an opportunity to present his side of the story."**[6]

The Court then clarified that "[w]e hold only that, in being given an opportunity to explain his version of the facts at this discussion, the student first be told what he is accused of doing and what the basis of the accusation is . . . [R]equiring effective notice and [an] informal hearing permitting the student to give his version of the events will provide a meaningful hedge against erroneous action."[7] Courts have interpreted *Goss* to mean "there are two basic due process requirements: (1) notice, and (2) an opportunity to be heard.[8]

Returning to the hypothetical example above, it is debatable whether the university is complying with the notice requirement of *Goss*. While the university did send a letter to the chapter saying it is suspected of violating university rules, it never clarified which rule. Failure to provide information in the notice makes it incredibly difficult for the chapter to present their side of the story.

However, it is indisputable that the university has failed to comply with the requirement that the group receive the opportunity to be heard. The university has refused the chapter's request for an explanation of the evidence against them, and has not presented the chapter with an opportunity to present their side of the story within a reasonable timeframe. This constitutes a clear deprivation of due process. If the university forces the chapter to cancel its previously scheduled elections and philanthropy events, it has suffered irreparable injury. As the Supreme Court has held, "[t]he loss of

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First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury."[9]

We will continue to monitor how universities are imposing interim suspensions on student organizations. Ultimately, if universities impose these sanctions while failing to comply with the requirements of notice and the opportunity to be heard, they should be held accountable in civil suits for the deprivation of rights under 42 U.S. Code § 1983, where the chapter can be awarded declaratory relief and attorneys' fees.

• Micah E. Kamrass

1 See Pi Lambda Phi Fraternity, Inc. v. University of Pittsburgh, 229 F.3d 435, 443–445 (3d Cir. 2000) ("The Supreme Court has recognized a First Amendment right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends. Thus,[t]he First Amendment's protection of expressive association is not reserved for advocacy groups. But to come within its ambit, a group must engage in some form of expression, whether it be public or private. [W]e are not holding that fraternities per se do not engage in constitutionally protected expressive association. It is entirely possible that a fraternity (or sorority, or similar group) could make out a successful expressive association claim."

2 See, e.g., Matthews v. Harney Cnty., Or., School Dist. No. 4, 819 F.2d 889, 891 (9th Cir. 1987) ("The Fourteenth Amendment's guarantee of due process applies when a constitutionally protected liberty or property interest is at stake.")

3 Goss v. Lopez, 419 U.S. 565, 582–83 (1975) ("Students whose presence poses a continuing danger to persons or property or an ongoing threat of disrupting the academic process may be immediately removed from school. In such cases, the necessary notice and hearing should follow as soon as practicable.").

4 Id.

5 *See, e.g., Hill v. Board of Trustees of Michigan State University*, 182 F. Supp. 2d 621 (W.D. Mich. 2001).

6 *Goss*, 419 U.S. at 581 (emphasis added).

7 *Id.* at 582–83.

8 *Flaim v. Medical College of Ohio*, 418 F.3d 629, 634 (6th Cir. 2005).

9 *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

Lawsuits Filed Following UVA Article Retraction

Three lawsuits have been filed against *Rolling Stone* magazine following the retraction of its discredited[1] article, "A Rape on Campus: A Brutal Assault and Struggle for Justice at UVA." This article was previously discussed in our January 2015 issue.[2]

On November 9, 2015, the Virginia Alpha Chapter of Phi Kappa Psi filed a defamation suit in Charlottesville Circuit Court seeking $25 million in damages to the organization's reputation.[3] The complaint alleged that "*Rolling Stone* published a devastating story it knowingly failed to verify, in reckless disregard for truth or falsity," and detailed the threats and vandalism the fraternity experienced in the days following the article's publication.[4]

> ***Rolling Stone*** **apologized to those "damaged by our story and the ensuing fallout, including members of the Phi Kappa Psi fraternity and UVA administrators."**

On July 29, 2015, three individuals—all University of Virginia alumni and Phi Kappa Psi Fraternity members—filed a federal lawsuit in the Southern District of New York claiming defamation and negligent infliction of emotional distress.[5] The three alleged that *Rolling Stone* and the article's author, contributing editor Sabrina Erdely, "created a simple and direct way" to match the plaintiffs with the attackers portrayed in the article.[6]

The plaintiffs alleged that they were identified as potential attackers on local gossip websites, causing members of their community to "interrogate, humiliate, and scold them."[7] One further claimed that the article identified his bedroom as the likely scene of its narrative's alleged gang rape.[8] All claimed that the article had a "devastating effect on [their] reputations"[9] and demanded "judgment in their favor in an amount in excess of $75,000" among other relief.[10]

The same day, *Rolling Stone* announced that managing editor Will Dana would resign after nineteen years with the magazine.[11] The magazine stated that "many factors go into a decision like this."[12]

Previously, on May 12, 2015, UVA Associate Dean of Students Nicole P. Eramo filed a defamation suit against the same Defendants.[13] Eramo's duties include serving as the head of UVA's Sexual Misconduct Board,[14] and she alleged that the article "irreparabl[y] harm[ed]" her professional reputation[15] by falsely depicting her as "callous" toward sexual assault victims.[16] She demanded compensatory and punitive damages totaling $7.8 million.[17]

The three lawsuits all cite a March 23, 2015 statement from the Charlottesville, VA Police Department concluding that the article's central narrative held "no substantive basis of fact."[18] "Jackie," the article's protagonist, had not cooperated with the police investigation, and it was suspended pending additional evidence.[19]

On April 5, 2015, *Rolling Stone* retracted Erdely's article and replaced it with a self-commissioned report from the Columbia University Graduate School of Journalism, "'A Rape on Campus': What Went Wrong."[20] This report concluded that the episode was "a story of journalistic failure that was avoidable."[21] *Rolling Stone*

also apologized to those "damaged by our story and the ensuing fallout, including members of the Phi Kappa Psi fraternity and UVA administrators."[22] Erdely issued a separate apology stating she "did not go far enough to verify" Jackie's account.[23]

The following day, the Virginia Alpha chapter "announced plans to pursue all available legal action against" *Rolling Stone*.[24] At that time, one blogger commented that a suit brought by the chapter as a corporate entity could face "substantial hurdles," noting that "bad journalism doesn't necessarily amount to legal liability."[25]

Under Virginia law, defamation plaintiffs must show a "sufficient nexus" between the publication of an allegedly false statement and its negative impact on the individual's reputation.[26] The statement must also be "of and concerning" the plaintiff,[27] and he or she must establish the "requisite intent."[28] U.S. Supreme Court precedent requires a "public official" to establish that a defamatory statement was published with "actual malice," defined as knowledge that the statement was false or a reckless disregard of whether it was false or not.[29] UCLA Law Professor Eugene Volokh has argued that Eramo's status as a "high-level university administrator" may qualify her as a "public official" because she "exercise[s] significant influence over a public institution."[30] Eramo's complaint alleged that the Defendants acted with "actual malice"[31] but did not address whether she is a "public official." The individual Phi Kappa Psi members, all private individuals, alleged that the Defendants' conduct was "negligent at a minimum."[32]

- Colin P. Pool*

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1 *See* Paul Fahri &T. Rees Shapiro, *Rolling Stone Retracts Discredited U-Va Rape Story*, WASH. POST (April 5, 2015), https://www.washingtonpost.com/lifestyle/style/inquiry-of-rolling-stone-u-va-rape-story-finds-series-of-journalistic-lapses/2015/04/05/666e3932-c8de-11e4-a199-6cb5e63819d2_story.html.

2 Micah Kamrass, *UVa: A Case for Due Process*, FRATERNAL LAW, Jan. 2015, http://fraternallaw.com/wp-content/uploads/2015/01/Fraternal-Law-Newsletter-January-2015.pdf.

3 Complaint, Virginia Alpha Chapter of Phi Kappa Psi Fraternity v. Rolling Stone, L.L.C., No. CL15-479, at 1, ¶ 1, 92 (Va. Cir. Ct. Nov. 9, 2015).

4 *Id.* at ¶ 5, exhibits. H–M.

5 Complaint, Elias v. Rolling Stone, No. 1:15-cv-05953-PKC, at ¶¶ 1, 121–158 (S.D.N.Y. July 29, 2015).

6 *Id.* at ¶ 3.

7 *Id.* at ¶¶ 4–5.

8 *Id.* at ¶ 4.

9 *Id.* at ¶ 6.

10 *Id.* at p. 40.

11 Ravi Somaya, *Will Dana, Rolling Stone's Managing Editor, to Depart*, N.Y. TIMES, July 30, 2015, at B4.

12 *Id.*

13 Complaint, Doc. 14-1, *Eramo v. Rolling Stone*, No. 3:15-cv-00023-GEC, at ¶ 1 (W.D. Va. Filed June 9, 2015) (document originally filed in the Circuit Court of the City of Charlottesville on May 12, 2015, *see* p. 1).

14 *Id.* at ¶ 7.

15 *Id.* at ¶ 16.

16 *Id.* at 10.

17 *Id.* at Page ID #386.

18 *Full Text: Charlottesville Police Statement in U-VA Sex Assault Case*, WASH. POST (Mar. 23, 2015), http://www.washingtonpost.com/local/full-text-charlottesville-police-statement-in-u-va-sex-assault-case/2015/03/23/ec4485bc-d193-11e4-8fce-3941fc548f1c_story.html.

19 *Id.*

20 Sheila Coronel, Steve Coll, & Derek Kravitz, *Rolling Stone & UVA: The Columbia University Graduate School of Journalism Report, "A Rape On Campus": What Went Wrong*, ROLLING STONE (Apr. 5, 2015), http://www.rollingstone.com/culture/features/a-rape-on-campus-what-went-wrong-20150405.

21 *Id.*

22 *Id.*

23 *Sabrina Rubin Erdely, Writer of Rolling Stone Rape Article, Issues Statement*, N.Y. TIMES (Apr. 5, 2015), http://www.nytimes.com/2015/04/06/business/media/statement-from-writer-of-rolling-stone-rape-article-sabrina-erdely.html.

24 John Bacon & Emma Hinchliffe, *Frat to Pursue Legal Action Against Rolling Stone*, USA Today (Apr. 7, 2015, 7:01 AM), http://www.usatoday.com/story/news/nation/2015/04/06/uva-fraternity-lawsuit-rolling-stone/25363051.

25 Jacob Gershman, *Sizing Up Phi Kappa Psi's Potential Suit Against Rolling Stone*, WALL ST. J. LAW BLOG, http://blogs.wsj.com/law/2015/04/07/sizing-up-phi-kappa-psis-potential-suit-against-rolling-stone.

26 Schaeffer v. Bouffault, No. 141480, Op. at 19 (Va. June 24, 2015), *available at* http://www.courts.state.va.us/opinions/opnscvwp/1141480.pdf.

27 *Id.*

28 *Id.* at 5.

29 New York Times Co. v. Sullivan, 376 U.S. 254, 280 (1964).

30 Eugene Volokh, *UVA Associate Dean Nicole Eramo Sues Rolling Stone: An Early Analysis*, VOLOKH CONSPIRACY (May 12), https://www.washingtonpost.com/news/volokh-conspiracy/wp/2015/05/12/uva-associate-dean-nicole-eramo-sues-rolling-stone-an-early-analysis.

31 Complaint, Doc. 14-1, Eramo v. Rolling Stone, No. 3:15-cv-00023-GEC, at ¶ 1 (W.D. Va. Filed June 9, 2015) (document originally filed in the Circuit Court of the City of Charlottesville on May 12, 2015, *see* p. 1).

32 Complaint, Elias v. Rolling Stone, No. 1:15-cv-05953-PKC, at ¶¶ 127 (S.D.N.Y. July 29, 2015).

Fraternity Pledge's Family Files Wrongful Death Lawsuit

The family of a West Virginia University fraternity pledge who died from alcohol poisoning has filed a wrongful death suit.[1]

The suit, filed October 8, 2015[2] in the Monongalia County Circuit Court,[3] alleges negligence and related claims against West Virginia University, the national Kappa Sigma Fraternity, the local Gamma Phi chapter of Kappa Sigma, the Kappa Sigma House Association, two individual Gamma Phi members, two individual property owners, and twenty "John Doe" defendants.[4] The family seeks compensatory and punitive damages.[5]

The complaint alleges that on November 12, 2014, Kappa Sigma hosted a mandatory "Big/Little" ceremony for its pledges which Nolan Burch, 18, attended.[6] According to the suit, Burch's "big brother" gave him a bottle of liquor and, along with other fraternity members, coerced him to drink it and other alcoholic beverages.[7] Burch later became unresponsive and was transported to a hospital, where he died on November 14, 2014.[8] Medical tests showed that Burch had a blood alcohol content of 0.493.[9]

The event's "master of ceremonies," Jordan Hankins, and Burch's "big brother," Richard Schwartz, are named as Defendants in the suit.[10] Morgantown Police charged both men with hazing and conspiracy to commit hazing following Burch's death.[11] The judge originally assigned to the criminal case, Phillip Gaujot, recused himself due to his prior membership in Kappa Sigma.[12]

The suit alleges that WVU knew or had reason to know that Kappa Sigma and the Gamma Phi chapter promoted hazing and excessive/underage drinking and did nothing to stop this behavior.[13] It further claims that Kappa Sigma and the Gamma Phi chapter failed to develop policies and implement measures to curb excessive drinking,[14] and that the owners of the property where the party took place were complicit in the use of their property as a venue for excessive drinking.[15]

CNN recently reported that, prior to the event, WVU knew that Kappa Sigma had a history of "occurrences of concern," including "behaving inappropriately and hosting an unsanctioned event," but had not made this information public.[16] Two days before the event, the national Kappa Sigma office notified WVU that it was pulling the Gamma Phi chapter's charter.[17] According to the national office, it had directed the Gamma Phi chapter to stop holding functions, but the directive was ignored.[18]

Terry Connors, attorney for the Burch family, stated, "The allegations that we've made in this complaint deal with conduct that should've been undertaken by the university to protect the students there from these kinds of activities and especially in this situation where there have been significant problems with this fraternity on prior occasions."[19]

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1 Jeff Preval, *Family of Teen Who Died at West Virginia University Files* Lawsuit, WGRZ.COM (Oct. 9, 2015, 8:13 PM), http://www.wgrz.com/story/news/2015/10/09/lawsuit-west-virginia-williamsville/73686350.

2 *Id.*

3 Complaint at 1, Burch v. Kappa Sigma Fraternity, No. _____ (W. Va. Cir. Ct. October 8, 2015), *available at* https://lintvwivb.files.wordpress.com/2015/10/see-the-burch-lawsuit-here.pdf.

4 *Id.*

5 *Id.* at 29.

6 *Id.* at ¶¶ 3, 77–96.

7 *Id.* at ¶¶ 98–102.

8 *Id.* at ¶¶ 103–115.

9 *West Virginia Frat Pledge Nolan Burch Had 0.493 Blood-Alcohol Level*, NBC NEWS (Jan 28, 2015, 8:21 AM), http://www.nbcnews.com/news/us-news/west-virginia-frat-pledge-nolan-burch-had-0-493-blood-n295101.

10 Complaint at ¶¶ 40–47, 93, 97.

11 *Update: Second WVU Frat Member Arraigned in Hazing Death*, WSAZ.COM (Feb. 13, 2015, 4:19 PM), http://www.wsaz.com/home/headlines/WVU-Fraternity-Member-Charged-in-Hazing-Death-291571271.html.

12 Bethany Butler, *Judge Removes Himself from Case Involving WVU Hazing Incident*, WBOY.com (Aug. 25, 2015, 6:01 PM), http://www.wboy.com/story/29878379/judge-removes-himself-from-case-involving-wvu-hazing-incident.

13 Complaint at ¶¶ 151–61.

14 *Id.* at ¶¶ 120–30.

15 *Id.* at ¶¶ 169–75.

16 Sara Ganim, *Schools Knew of Trouble Before Student Deaths*, CNN.COM (Nov. 3, 2015, 9:18 AM), http://www.cnn.com/2015/11/02/us/fraternity-hazing-deaths.

17 *Id.*

18 *Id.*

19 Preval, *supra* note 2.

To review West Virginia University's response to the tragic death of Mr. Burch, see the November 2014 edition of *Fraternal Law*. The story is entitled "Deaths, Assaults, and Injuries Lead to Campus-Wide Bans on Greek Life."

Recent Developments with Campus Security Authorities

The Clery Act, which has now been in place for some 25 years, requires colleges and universities to track the incidents of certain crimes on and near campuses. It also requires that that data be publicly available and that the campus have in place a method of alerting the campus when a dangerous situation exists.

As a part of complying with Clery, Institutions of Higher Education (IHEs) are required to, among other things, designate those individuals on campus who are campus security authorities (CSAs), who have the responsibility to report knowledge of crimes. Generally, campus security authorities are employees of the university with authority to act on behalf of the institution. They include university police and security officials, officials of the institution who have significant responsibility for student and campus activity and the authority and the duty to take action or respond on behalf of the institution. In addition, CSAs may include any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.

It is that last category of CSAs under which a few universities have designated or are considering designating volunteer chapter advisors of fraternities and sororities as campus security authorities.

There is no legal requirement for colleges and universities to name chapter advisors as CSAs. William E. Thro, General Counsel for the University of Kentucky, acknowledged that the University was "not legally required to designate house directors and chapter advisors as campus security authorities (CSAs), the University is not legally prohibited from doing so." That appears to be an accurate statement of the law.

Penn State was perhaps the first large university to require chapter advisors to serve as campus security authorities.

Both the North American Interfraternity Conference and the National Panhellenic Conference have voiced their opposition to such designations. The Fair Campus Act, which is pending in Congress with the continued support of NPC and NIC, would prohibit such designations.

There are good reasons for chapter advisors not to be campus security authorities. First, it is difficult enough to recruit and retain volunteers as chapter advisors. Requiring them to act at the direction of the university to report knowledge of crimes may well be perceived as going beyond what they have volunteered to do. In a few instances, Greek organizations have already reported losing or having difficulty retaining chapter advisors where universities have dictated they must serve as campus security authorities and are required to attend the training to learn how to fulfill that role. Chapter advisors serve a valuable function for both Greek groups and the universities where chapters are located. It is not unreasonable to expect that universities would recognize it is not wise to make the jobs of volunteer chapter advisors more difficult or discourage them from continuing in those roles.

The Clery Act requires colleges and universities to track the incidents of certain crimes on and near campuses.

Designating chapter advisors as campus security authorities also has the potential to change the nature of the relationship between a chapter advisor and members of the chapter. A good chapter advisor may well have confidential discussions with members of the chapter. They may become mentors. Members of the chapter may come to them asking for confidential advice. If the chapter members come to believe that they cannot have confidential discussions with chapter advisors, it will make their relationship more difficult.

Finally, there is at least the potential for liability to be imposed on a campus security authority for reporting information about a crime. That is the case even though the required Clery Act reporting only means reporting when a crime occurred, when the campus security authority learned the crime occurred, what the crime was and where it occurred. It does not include naming who the perpetrator was or the victim.

Penn State was perhaps the first large university to require chapter advisors to serve as campus security authorities. When advising chapter advisors of that requirement, university officials made it clear that they recognized there may be a concern about potential liability and promised to "indemnify" volunteers acting as chapter advisors. More recently, both the University of Kentucky and the University of Cincinnati have acknowledged that chapter advisors acting within the scope of their duties as required by the University as campus security authorities would be covered by the University's insurance.

If legislation does not solve the problem and Greek groups are unable to convince colleges and universities not to declare chapter advisors to be CSAs, fraternal organizations should insist on confirmation in writing that fraternity volunteers acting as the school's CSAs are covered under the school's insurance policies. In short, perhaps it is time to turn the tables and ask universities for certificates of insurance.

- Timothy M. Burke

Transgender Policy Updates

The September issue of *Fraternal Law* reported that Sigma Phi Epsilon had adopted a policy acknowledging that "any individual who identifies as a man is welcome to seek membership in the fraternity." *Fraternal Law* inaccurately reported that Sigma Phi Epsilon became the first men's fraternity to adopt a clear transgender policy.

In fact, months earlier, Lambda Chi Alpha published an official ruling of the Grand High Pi on the issue of gender identity. While the ruling reaffirmed the single-sex membership of Lambda Chi Alpha, the ruling made it clear that:

> "a college 'man' for the purposes of our laws, is any individual who at the time both of his association and his initiation, self identifies as male, regardless of his assigned sex at birth, or the perceived expression of his gender. Any such individual should be considered on an equal basis with all other candidates...."

As the ruling pointed out, at least 23 universities at which Lambda Chi Alpha either has or has had a chapter, gender identity is among the prohibitions against discrimination enforced by the university. The list of schools prohibiting such discrimination continues to grow.

- Timothy M. Burke

Fraternity Marches to End Violence

Over the last few months, college campuses have experienced a rebirth of a student activism. Students and student groups have organized demonstrations geared toward creating substantive changes at their schools. Most notoriously, the University of Missouri President and Chancellor both resigned after protests concerning the administration's inaction to incidents of racism on campus.

The Alpha Phi Alpha Fraternity recently decided to extend this activism beyond campus, and into one of Chicago's most dangerous neighborhoods. On November 21, 2015 nearly 300 members of the fraternity marched through a community that is the center of a gang war.[1] State Representative Elgie Sims, who is a member of Alpha Phi Alpha said "[w]e wanted to show that the community was not giving up... We wanted the business owners to know that we stood with them and we were going to be there making a statement, standing with them, ... to encourage people to feel comfortable and safe in their community."

Reverend Roosevelt Watkins, the pastor of a neighboring Church and also a member of Alpha Phi Alpha said the march was designed to "confront the violence on these blocks and to reinvigorate economic development..."

As the power of student demonstrations continues to grow both on and off campus, it is exciting to see fraternities and sororities take a leadership role.

- Micah E. Kamrass

1 Fraternity Marches Through Ongoing Gang War To End Violence In Chicago. http://www.huffingtonpost.com/entry/alphas-in-the-streets-march_565364c2e4b0879a5b0be458?ncid=tweetlnkushpmg00000056.

2015 Fraternal Law Conference Review

The 2015 Fraternal Law Conference took place on November 11 and 12, and was a tremendous success. The list of more than 150 participants included fraternity and sorority staff and volunteers, university administrators, private practice attorneys, and insurance industry leaders.

The list of presenters included Joe Cohn (Legislative and Policy Director at the Foundation for Individual Rights in Education), Dr. Javaune Adams-Gaston (VP for Student Life at The Ohio State University), a panel comprised of three University Risk Management Officers, Gary Wade (retired Tennessee Supreme Court Justice), and many other distinguished leaders.

As we begin to plan the 2016 Fraternal Law Conference, we always welcome your feedback and ideas. If you have suggestions for future presentation topics or presenters, please send them to Micah Kamrass at MKamrass@ManleyBurke.com. We will include a save the date for the 2016 conference in the January edition of Fraternal Law. We hope to see you there!

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The Goal of *Fraternal Law* is to provide a discussion of fraternity law, but its contents are not intended to provide legal advice for individual problems of Greek organizations. The latter should be obtained from your attorney.

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