



The VA + DC 2025–2026 High School
Mock Trial Case

Devan Rice

v.

The Chronicle and Dakota Saravana

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Promoting Access to Justice and the Rule of Law

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Case Summary

“I may not agree with what you have to say, but I will defend to the death your right to say it.” This apocryphal quote from the famous Enlightenment writer and philosopher, Voltaire, encapsulates the American attitude toward one of our most jealously guarded fundamental rights: freedom of speech.

But even the right to free speech is not absolute. The courts have long recognized that there must be a balance between freedom of expression and protecting people from misinformation and defamation. In the seminal 1964 case of *New York Times v. Sullivan*, the Supreme Court of the United States tried to balance those interests in the context of the media writing about public officials, establishing what has become known as the “actual malice” standard. This standard seeks to allow space for the First Amendment right to criticize public officials, even if incorrectly, but allows public officials to recover for defamation where the media outlet acted with knowledge that its statement was false or with reckless disregard for the truth. Yet, despite more than 60 years since *New York Times v. Sullivan*, where exactly that balance lies is anything but clear. This year’s case gives you the opportunity to litigate these First Amendment issues.

All names, characters, and events presented are entirely fictitious. This case was created solely for educational purposes. Any similarity to actual persons, living or dead, or to any real-world events, is purely coincidental.

In this year’s case, we return once more to our beloved, fictional town of Morgan, Virginia. Skyview University is a core part of the fabric of Morgan. It is known for its stellar academic reputation and the success of its graduates. But something dark lurks in the shadows of this hallowed institution. Like many other American universities, Skyview is host to a secret society that pulls its members from the student body. The Crow & Eye Society is the worst-kept secret on campus. Although everyone knows it exists, only a few know the true extent of its power and influence. To some people, the Crow & Eye is inconsequential — a social club for the rich and powerful to make them feel special. To others, the Crow & Eye is an insidious puppet master, pulling the strings of every aspect of college life, and even beyond.

However, when an initiation ritual of the Crow & Eye Society goes wrong and a student falls to his death on campus, people begin to wonder whether anyone will be held accountable. Enter intrepid student reporter, Dakota Saravana, the Editor-in-Chief of the school newspaper, *The Chronicle*. Saravana vows to find out what really happened on the night of October 13, 2023, and stop the Crow & Eye Society once and for all. And Saravana can’t help but notice that the president of the university, Devan Rice, just so happens to be a former member of the Crow & Eye Society.

President Rice has insisted that they cut ties with the secret society and took affirmative steps to combat hazing on campus. Publicly, President Rice condemns the actions of the Crow & Eye and its involvement in Lee Reddy IV’s death. But when Saravana starts publishing articles that ask uncomfortable questions, the university is forced to hire a private investigator to clear the

president's name.

For a while, it seems like Saravana's investigation into President Rice will go nowhere, until an anonymous source appears claiming to have evidence that President Rice not only knew about the ritual that would lead to Reddy's death but was also there that fateful night. Saravana publishes an article in *The Chronicle* to expose President Rice. A media circus ensues, Skyview becomes the center of controversy, and President Rice is forced to resign in disgrace.

But Devan Rice claims that the article published by Saravana is nothing but lies. Dr. Rice wasn't even in town the night that Lee Reddy IV died! Dr. Rice accuses Saravana of ignoring all evidence that Rice was innocent and knowingly publishing a false story based upon a personal vendetta rather than facts. Dr. Rice has sued Saravana and *The Chronicle* for defamation.

Who is right, and who will prevail? Is Dakota Saravana a crusader of free speech or an unscrupulous muckraker who was blinded to the truth by their hatred of President Rice? Is President Rice the head of an evil secret society terrorizing Skyview or a champion of justice who was trying to protect the university and wrongly accused? The case is now in your hands.

And may it please the court.

ACKNOWLEDGMENTS

This year's mock trial case was a collaborative effort from many people who volunteered their time, expertise, and creativity to bring you a complex and entertaining fact pattern. This year's case would not be possible without their tremendous hard work, and as Chair of the Case Committee, I would like to acknowledge and thank those individuals and organizations.

First, I would like to thank the entire Case Committee for volunteering so many hours to meeting, drafting, creating exhibits, and researching all the parts that make up this case. Eli, Ryan, Andrea, and Kate, it was an absolute pleasure working with each of you this year. Additionally, Eli Schlam deserves particular thanks as the person who proposed that we write an original case based on defamation. This case simply would not exist without his initial idea and his willingness to work in collaboration with the rest of the committee to develop a complex and interesting case.

Second, as any good mock trialer knows, experts are necessary for educating lay people on specialized topics. The Case Committee was fortunate to have the support of experts in the field of journalism who volunteered their time and knowledge to the development of this case. In particular, I want to thank Maria Servold, the Assistant Director of the Dow Journalism Program at Hillsdale College and Faculty Advisor for the Hillsdale newspaper, *The Collegian*. Maria was instrumental in educating a group of clueless attorneys on how a college newspaper functions and the guidelines that student reporters would be expected to follow.

I would also like to thank our friends at the Society of Professional Journalists, who graciously allowed us to include their Code of Ethics as an exhibit in this year's case packet, and provided additional resources to educate the Case Committee on the ethics of journalism. We were fortunate to have their support and permission to use real world sources relied upon by actual journalists.

Finally, I would like to thank the entire Virginia Law-Related Education Institute Board for their time, dedication, and hard work throughout the year to make this competition possible. Every member of the Board volunteers because of their passion for the law and education. Many members also volunteer as coaches and judges for the competition. We simply could not run this competition without the tireless efforts of all our volunteers.

On behalf of the Case Committee, we wish each and every team the very best of luck, and we hope that you enjoy your time exploring the secrets of Skyview University.

Sincerely,

Catie Donnelly

Chair of the Case Committee

DEVAN RICE,

Plaintiff,

v.

THE CHRONICLE AND

DAKOTA SARAVANA,

Defendants.

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Case No. CL24-245

7. Defendant, *The Chronicle*, is a Virginia corporation that operates a student-run newspaper at Skyview University. It is located in Morgan, Virginia. The defamatory statements were published in the newspaper, *The Chronicle*, published by Defendant.
8. Defendant, Dakota Saravana, is a student at Skyview University and the Editor-in-Chief of Skyview's *The Chronicle*. Saravana is also the author of the defamatory articles published in *The Chronicle*. Saravana is a resident of the Commonwealth of Virginia, residing in Morgan, Virginia.
9. Jurisdiction and venue are proper in the Circuit Court for Morgan County as all relevant events and actions occurred in Morgan, Virginia.
10. On October 13, 2023, Reddy, a Skyview University student, tragically died while being hazed during an initiation ceremony into the Crow & Eye Secret Society.
11. Following Reddy's death, the Board of Visitors of Skyview University commissioned a private investigator, Shawn Sonti, to conduct an independent, external investigation to determine the cause of Reddy's death, who was responsible for it, and steps the University could take to prevent hazing ("The Sonti Investigation").
12. The Sonti Investigation found that Reddy's death was the result of dangerous hazing activities led by some students and alumni members of the Crow & Eye Secret Society.
13. The Sonti Investigation found that, despite the fact that Rice was an alumnus of the Crow & Eye Secret Society, Rice was not aware of the hazing or physically in attendance at the October 13, 2023, initiation ceremony. The Sonti Investigation cleared Rice of any fault or culpability for Reddy's death.
14. The conclusions of the Sonti Investigation were made public on December 15, 2023.
15. In fact, while president of Skyview University, Rice had taken several steps to educate students on hazing, prevent hazing from occurring, and punish hazing violations.
16. Notwithstanding the findings of the Sonti Investigation, *The Chronicle* and its Editor-in-Chief, Saravana, refused to accept that Rice had no knowledge of or involvement with the hazing that led to Reddy's death.
17. Saravana and the faculty advisor of *The Chronicle*, Justice Marlow, had a long-standing hatred of Rice from before Reddy's death due to changes Rice made to the Journalism Department, where Saravana was a student and Marlow a faculty member.
18. Saravana and *The Chronicle* ignored all evidence and journalism standards in publishing an "expose" claiming that it had uncovered evidence that Rice had knowledge of and was involved in the hazing that caused Reddy's death.

19. Specifically, on March 13, 2024, *The Chronicle* published an article, attached as Exhibit 1, written by Saravana, that included the following false and defamatory statements:

- a) “[N]ew evidence recently obtained by *The Chronicle* from an anonymous source proves that Rice was involved in the Crow & Eye initiation ceremony and had knowledge of the hazing.”
- b) “New evidence shows that Rice lied about being out of town on October 13, 2023, and was, in fact, on campus the evening of Reddy’s death.”
- c) “New evidence suggests that President Rice was leading the ritual that ended in Reddy’s death.”
- d) “Rice had knowledge of and was involved in the hazing that caused Reddy’s death and must be held responsible.”
- e) “Despite claiming to have ended their involvement in the Crow & Eye, it is well-known that Rice continues to maintain their connections to the secret society and its well-connected members.”
- f) “Rice is not the crusader against hazing that they claim to be, having repeatedly turned a blind eye to the conduct of the Crow & Eye.”

20. The supposed basis for these statements was an anonymous source. It has since been uncovered that the anonymous source was a disgruntled member of the Crow & Eye Secret Society, Kendall Rose.

21. The information Rose gave to *The Chronicle* was false.

22. Saravana and *The Chronicle* knew the information provided by Rose was false. They also took no efforts to confirm information provided by Rose or conduct any significant investigation before publishing the March 13 newspaper article. They failed to follow up on information they had that directly contradicted the information provided by Rose.

23. In so doing, Saravana and *The Chronicle* violated basic journalistic standards as well as *The Chronicle’s* own policies and procedures for researching, vetting, and reviewing articles before publication.

24. Instead, Saravana published the above statements to harm Rice because of Saravana’s hatred and anger toward Rice and with knowledge that the statements were false or with reckless disregard for the truth.

25. Despite Rice’s denial of the allegations in *The Chronicle* article, the Board of Visitors terminated Rice because of the public fallout from the article. Rice’s reputation has been destroyed by the article, and Rice has been unable to obtain another job as a University President.

COUNT I
Defamation – Libel

26. Rice reasserts all the allegations made above.

27. On March 13, 2024, Saravana and *The Chronicle* published a story on the front page of *The Chronicle* newspaper that contained false and defamatory statements of fact about Rice's involvement in the death of Reddy.

28. The March 13, 2024, story was published to numerous third parties who read the story in the print and online editions of *The Chronicle*.

29. These false statements harmed Rice's reputation by asserting that Rice was involved with and responsible for hazing that resulted in a student's death. This assertion led Skyview University to terminate Rice's employment as president.

30. Specifically, the March 13, 2024, story published by Defendants falsely stated that Rice knew that the hazing ritual would occur on October 13, 2023, and that Rice was present at and participated in the hazing.

31. Saravana and *The Chronicle* published these false and defamatory statements with actual malice, that is, with knowledge that they were false or with reckless disregard for the truth. Saravana and *The Chronicle* recklessly disregarded the truth because they had facts available to them that demonstrated that the statements they made were false and failed to conduct any significant investigation of the allegations made by a disgruntled member of the Crow & Eye Society.

32. As a result of Saravana and *The Chronicle's* defamation, Rice has suffered damages in the form of loss of income, damaged reputation, and inability to procure future employment at the same level as before. Rice's damages exceed \$10,000,000.

33. Rice requests the following relief:

- Monetary damages of \$10,000,000;
- Injunctive relief requiring *The Chronicle* to print a public retraction of the March 13, 2024, story and publicly apologize to Rice;
- Attorneys' fees and costs; and
- Any and all other relief deemed appropriate by the Court.

34. Plaintiff requests a trial by jury.

Respectfully submitted,

DEVAN RICE

By Counsel

Sky Sayah

Sky Sayah, Esquire

SAYAH, AGARWAL, & BRICENO LAW, P.C.

1800 Waleska Avenue, Suite 100

Morgan, Virginia

Counsel for Plaintiff

EXHIBIT 1 TO COMPLAINT

March 13, 2024

“New Evidence Proves President Rice’s Involvement in Reddy’s Death”

By Dakota Saravana

The tragic death of Lee Reddy IV on October 13, 2023, as a result of a Crow & Eye Society hazing has rocked the Skyview community. Reddy was a beloved Skyview student and campus leader. Those directly responsible for the tragedy are currently facing criminal prosecution, and one can only hope that they are held accountable for their crimes despite the power and connections of the Crow & Eye in Morgan.

Until now, however, President Rice has evaded any responsibility for Reddy’s death, despite it being well-known that Rice is a Crow & Eye member. An investigation conducted by the university’s hand-picked investigator, Sonti, unsurprisingly claimed it found no evidence that Rice had any knowledge of or involvement with the hazing that killed Reddy. Despite repeated requests for comment from *The Chronicle*, Rice has declined and referred only to the official statement from the Office of the President.

But new evidence recently obtained by *The Chronicle* from an anonymous source proves that Rice was involved in the Crow & Eye initiation ceremony and had knowledge of the hazing. *The Chronicle* is not publishing the identity of the source to protect them from retribution, but this source has inside knowledge of the cancer afflicting this university. New evidence shows that Rice lied about being out of town on October 13, 2023, and was, in fact, on campus the evening of Reddy’s death. New evidence suggests that President Rice was leading the ritual that ended in Reddy’s death. Rice had knowledge of and was involved in the hazing that caused Reddy’s death and must be held responsible.

Rice’s involvement with and responsibility for Reddy’s death is not surprising. Despite claiming to have ended their involvement in the Crow & Eye, it is well-known that Rice continues to maintain their connections to the secret society and its well-connected members — once a Crow, always a Crow. Additionally, Rice is not the crusader against hazing that they claim to be, having repeatedly turned a blind eye to the conduct of the Crow & Eye. Rice is a terrible president who has ruined Skyview University and made it unsafe for students by letting the Crow & Eye run amok on campus.

One can only hope that the university reopens its investigation into President Rice and that Rice is held accountable for the killing of Reddy. This community can no longer stand by while a murder of crows tears it apart from within. *The Chronicle* will continue to follow this story and ensure that the truth is revealed.

IN THE CIRCUIT COURT OF MORGAN COUNTY

DEVAN RICE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CL24-245
	)	
THE CHRONICLE AND	)	
	)	
DAKOTA SARAVANA,	)	
	)	
Defendants.	)	

ANSWER

COME NOW Defendants, *The Chronicle* and Dakota Saravana, by counsel, and file this, their Answer to the Complaint, and state as follows:

1. Admitted.
2. Defendants lack sufficient information or knowledge to admit or deny the allegations contained in Paragraph 2, the result of which is to deny the same and demand strict proof thereof.
3. Denied.
4. Denied.
5. Denied.
6. Admitted.
7. Defendants admit only that *The Chronicle* is a Virginia corporation that runs the student newspaper at Skyview University and is located in Morgan, Virginia. The remaining allegations contained in Paragraph 7 are denied.
8. Defendants admit only that Dakota Saravana is a student at Skyview University and the Editor-in-Chief of *The Chronicle*, and a resident of Morgan, Virginia. The remaining allegations contained in Paragraph 8 are denied.
9. Paragraph 9 contains mere legal conclusions to which no response is required of Defendants.

10. Admitted.
11. Defendants admit only that following Reddy's death, the Board of Visitors commissioned Shawn Sonti to conduct an external investigation. The remaining allegations contained in Paragraph 11 are denied as phrased.
12. Admitted.
13. Defendants admit only that the Sonti Investigation found that Rice was not aware of the hazing or physically in attendance at the October 13, 2023, initiation ceremony. The remaining allegations contained in Paragraph 13 are denied as phrased.
14. Admitted.
15. Denied as phrased.
16. Denied as phrased.
17. Denied.
18. Denied.
19. Defendants admit only that on March 13, 2024, *The Chronicle* published the article attached to the Complaint as Exhibit 1. The remaining allegations contained in Paragraph 19 are denied because Defendants deny that any part of the article was defamatory.
20. Admitted.
21. Defendants lack sufficient information or knowledge to admit or deny the allegations contained in Paragraph 21, the result of which is to deny the same and demand strict proof thereof.
22. Denied.
23. Denied.
24. Denied.
25. Defendants lack sufficient information or knowledge to admit or deny the allegations contained in Paragraph 25, the result of which is to deny the same and demand strict proof thereof.
26. Defendants reassert their responses to Paragraphs 1–25.

27. Denied.
28. Admitted.
29. Denied.
30. Denied.
31. Denied.
32. Denied.
33. Defendants deny the allegations contained in Paragraph 33 because they deny being liable or indebted to Plaintiff in any amount.
34. Defendants request a trial by jury.

Respectfully submitted,

THE CHRONICLE
AND DAKOTA SARAVANA
By counsel

Sophia Lara

Sophia Lara, Esquire
LARA & LARA
37 Old Circus Circle
Morgan, Virginia
Counsel for Defendants

IN THE CIRCUIT COURT OF MORGAN COUNTY

DEVAN RICE,	)	
	)	
Plaintiff,	)	
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v.	)	Case No. CL24-245
	)	
THE CHRONICLE AND	)	
	)	
DAKOTA SARAVANA,	)	
	)	
Defendants.	)	

MEMORANDUM ORDER

Before the Court is the question of whether Plaintiff Devan Rice, the former president of Skyview University, a public institution of higher education in the Commonwealth of Virginia, qualifies as a “public official” in this lawsuit alleging defamation related to Rice’s tenure as university president. Whether an individual is a public official is a question of law for the Court to decide. See Rosenblatt v. Baer, 383 U.S. 75 (1966). For the reasons stated below, the Court finds that Devan Rice does qualify as a public official and, therefore, the actual malice standard articulated in New York Times Co. v. Sullivan, 376 U.S. 254 (1964), applies to this matter.

Whether a public university president is a public official in a case involving allegations of defamation appears to be a matter of first impression in Virginia. The U.S. Supreme Court and Virginia courts have long recognized that the term “public official” includes not only elected figures but also individuals in positions of substantial responsibility within government agencies or public institutions. See Rosenblatt, 383 U.S. 75. As the Supreme Court explained in Rosenblatt, the designation turns on whether the “position in government has such apparent importance that the public has an independent interest in the qualifications and performance of the person who holds it, beyond the general public interest in the qualifications and performance of all government employees[.]” If yes, “the New York Times malice standards apply.” Id. at 86.

The actual malice standard protects First Amendment rights when a case concerns criticism of an individual with substantial control over government affairs. Id. at 85. “There is, first, a strong interest in debate on public issues and second, a strong interest in debate about those persons who are in a position significantly to influence the resolution of those issues. Criticism of government is at the very center of the constitutionally protected area of free discussion. Criticism of those responsible for government operations must be free, lest criticism of government itself be penalized.” Id.

Here, Skyview University is a public university established and operated by the Commonwealth of Virginia. As its president, Dr. Rice occupied the highest-ranking administrative post at the institution and exercised substantial authority over educational policy, budgetary decisions, public communications, and the conduct of university personnel. Dr. Rice was also the public face of the university, regularly speaking on behalf of the institution in forums ranging from local government meetings to national academic conferences.

Applying the Rosenblatt standard, the Court concludes that Dr. Rice was a public official. Dr. Rice's position was one of significant influence, funded by public monies, and, as president of a public university, Dr. Rice's decisions directly impacted the educational and financial well-being of thousands of Virginians. The public had a legitimate and substantial interest in Dr. Rice's leadership and conduct beyond that of general interest in the qualifications of all government employees.

The Court notes that although the Supreme Court of Virginia has not had the opportunity to opine on this issue, courts in other jurisdictions have found that members of public university administration are public officials for the purpose of defamation. See Grossman v. Smart, 807 F. Supp. 1404 (C.D. Ill. 1992) (holding that the Chairperson of the Search Committee and Vice Chancellor for Research and for Graduate College were both public officials); Fiacco v. Sigma Alpha Epsilon Fraternity, 484 F. Supp. 2d 158 (D. Me. 2007), aff'd, 528 F.3d 94 (1st Cir. 2008) (finding that the Director for Judicial Affairs of the University of Maine was a public official for purposes of defamation); Lewis v. The University Chronicle, File No. CX-05-5539 (Minn. Ct. App. Jan. 25, 2008) (unpublished) (affirming lower court's determination that a prominent professor who served as interim dean of university was a limited-purpose public figure for purposes of defamation). This Court is persuaded by the reasoning employed by these other courts and finds that because the allegedly defamatory statements in this case were about a public university president and related to Plaintiff's conduct as president, Plaintiff Rice should be deemed a public official.

Accordingly, to prevail on the defamation claims in the present action, Dr. Rice must demonstrate by clear and convincing evidence that the allegedly defamatory statements were made with actual malice — that is, with knowledge of their falsity or with reckless disregard for the truth.

It is so ORDERED.

Dated: June 3, 2025

/s/ Varun Eturu

Chief Judge of the Circuit Court of Morgan County

IN THE CIRCUIT COURT OF MORGAN COUNTY

DEVAN RICE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CL24-245
	)	
THE CHRONICLE AND	)	
	)	
DAKOTA SARAVANA,	)	
	)	
Defendants.	)	

STIPULATIONS

1. All documents, signatures, and exhibits, including pre-markings included in the case materials, are authentic and accurate in all respects; no objections to the authenticity of any of the foregoing will be entertained. All other objections are preserved unless otherwise stipulated.
2. Jurisdiction, venue, and chain of custody of the evidence are proper and may not be challenged.
3. All statements given by the witnesses were given under oath, and the witnesses were instructed to include all relevant and material information. The witnesses were given an opportunity to review their statements and make any corrections up until the day of trial. No changes were made to any statements. Each statement should be considered signed by the person who gave it.
4. Except as noted elsewhere, objections may be made to any exhibit or testimony pursuant to the Rules of Evidence. However, no objection may be made as to the constitutionality of the admission of any evidence.
5. Plaintiff Devan Rice and Defendant Dakota Saravana are party representatives and may be seated at counsel table. Defendant Dakota Saravana is the party representative for both defendants.
6. This matter has been bifurcated on the issues of liability and damages. This trial will only address the issue of liability. The amount of Plaintiff's damages is irrelevant. However, Plaintiff may still offer evidence that Plaintiff was terminated as a result of the alleged defamation.

7. All individuals who were present during the death of Lee Reddy IV and all members of the Crow & Eye Society, other than individuals who are witnesses in this case, have asserted their Fifth Amendment right not to testify and are therefore unavailable. Neither side may comment or make any argument based on any such individual not testifying in front of the jury.
8. Lee Reddy IV died from blunt force trauma as a result of falling while climbing a tree on Skyview University's campus on October 13, 2023.
9. Exhibits 1 and 2 were articles written by Defendant Dakota Saravana and published in Defendant *The Chronicle*.
10. Exhibit 3 is an email receipt from Costline, an online booking service for flights, hotels, etc. The parties stipulate that Exhibit 3 is a business record that falls within Rule 803(6). No further foundation is necessary to establish that Exhibit 3 is a business record. However, the parties preserve all other objections that may be raised to Exhibit 3.
11. Exhibit 6 is a fair and accurate representation of the live oak tree from which Lee Reddy IV fell on October 13, 2023, and accurately portrays how it would have appeared on that date.
12. Exhibit 7 is a fair and accurate copy of text messages which were exchanged between Dakota Saravana (phone number: (703) 192-8842) and Presley Kurthi (phone number: (703) 144-7763). The document was produced by MetroLine Communications in response to a subpoena. The parties stipulate that the document itself is a business record within the meaning of Rule 803(6). No further foundation is necessary to establish that Exhibit 7 is a business record. However, the parties preserve all other objections that may be raised to Exhibit 7.
13. Exhibits 10 and 11 are the documents attached to the March 7, 2024, email from anonymouse@email to Dakota Saravana (included in Exhibit 9C).
14. Exhibit 13 is a fair and accurate copy of the Morgan Police Department Incident Report regarding Lee Reddy IV's death on October 13, 2023. The parties stipulate that it is a document that was made by a public office and sets out a matter observed by a police officer while under a legal duty to report and during a legally authorized investigation.
15. The handwriting on the taxi receipt (Exhibit 14) is Devan Rice's handwriting. Neither party may request that Devan Rice produce a handwriting sample at trial.

Sky Sayah

Attorney for Plaintiff

Sophia Lara

Attorney for Defendants

IN THE CIRCUIT COURT OF MORGAN COUNTY

DEVAN RICE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CL24-245
	)	
THE CHRONICLE AND	)	
	)	
DAKOTA SARA VANA,	)	
	)	
Defendants.	)	

JURY INSTRUCTIONS

No. 1

You are the judges of the facts, the credibility of the witnesses, and the weight of the evidence. You may consider the appearance and manner of the witnesses on the stand, their intelligence, their opportunity for knowing the truth and for having observed the things about which they testified, their interest in the outcome of the case, their bias, and, if any have been shown, their prior inconsistent statements, or whether they have knowingly testified untruthfully as to any material fact in the case.

You may not arbitrarily disregard believable testimony of a witness. However, after you have considered all the evidence in the case, then you may accept or discard all or part of the testimony of a witness as you think proper.

You are entitled to use your common sense in judging any testimony. From these things and all the other circumstances of the case, you may determine which witnesses are more believable and weigh their testimony accordingly.

No. 2

You shall return your verdict for the plaintiff if the plaintiff has proved by the greater weight of the evidence that:

(1) defendants made one or more of the following statement(s): “Rice was involved in the Crow & Eye initiation ceremony and had knowledge of the hazing[;]” “Rice lied about being out of town on October 13, 2023, and was, in fact, on campus the evening of Reddy’s death[;]”

“President Rice was leading the ritual that ended in Reddy’s death[;]” “Rice had knowledge of and was involved in the hazing that caused Reddy’s death and must be held responsible[;]” “Despite claiming to have ended their involvement in the Crow & Eye, it is well-known that Rice continues to maintain their connections to the secret society and its well-connected members[;]” “Rice is not the crusader against hazing that they claim to be, having repeatedly turned a blind eye to the conduct of the Crow & Eye[;]” and

(2) the statement was seen by someone other than the plaintiff; and

(3) the statement was about the plaintiff; and

(4) the statement was false; and

if the plaintiff further proved by clear and convincing evidence

(5) that the defendants knew the statement was false or made it so recklessly as to amount to a willful disregard for the truth, that is, with a high degree of awareness that the statement was probably false or where there were obvious reasons to doubt the veracity of the statements.

You shall find your verdict for the defendants if the plaintiff failed to prove any one or more of the five elements above.

No. 3

The greater weight of all the evidence is sometimes called the preponderance of the evidence. It is that evidence which you find more persuasive, when evaluated against all of the evidence that has been admitted in the case. The testimony of one witness whom you believe can be the greater weight of the evidence.

No. 4

When a party has the burden of proving an issue by clear and convincing evidence, the party must produce evidence that creates in your minds a firm belief or conviction that the party has proved the issue.

No. 5

In considering the weight to be given to the testimony of an expert witness, you should consider the basis for his/her opinion and the manner by which he/she arrived at it and the underlying facts and data upon which he/she relied.

No. 6

If you believe from the evidence that a witness other than a party previously made a statement inconsistent with his or her testimony at this trial, the only purpose for which you may consider the statement is for its bearing on the witness's credibility. It is not evidence that what the witness previously said is true.

No. 7

If you believe from the evidence that a party previously made a statement inconsistent with his or her testimony at this trial, you may consider that previous statement as evidence that what the party previously said was true.

No. 8

You must not base your verdict in any way upon sympathy, bias, guesswork, or speculation. Your verdict must be based solely upon the evidence and instructions of the court.

CASE LAW

The following excerpts are from case law concerning the legal issues raised in this mock trial case. Only portions of the opinions are provided, and only those portions may be used during the trial. Citations and internal quotation marks are omitted in the excerpts of the cases that follow, some facts have been changed from the original opinions, and some case names have been changed. All of the below cases are equally binding on this Court.

Depp v. Heard, 107 Va. Cir. 80 (Fairfax 2021)

The elements of a defamation claim are (1) publication of (2) an actionable statement with (3) the requisite intent. To be actionable, a statement must be both false and defamatory. Because statements of opinion cannot be “false,” they are never actionable. To qualify as defamatory, a statement must possess the requisite “sting” to one’s reputation. If language is merely “insulting, offensive, or otherwise inappropriate” but constitutes no more than “rhetorical hyperbole,” then it does not possess the requisite “sting” to be considered defamatory.

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

For a public official to overcome the First Amendment protection of speech and be able to recover damages for defamation related to his official conduct, he or she must prove that the defamatory statement was made with “actual malice.” Actual malice is defined as knowing falsity or reckless disregard for the truth. The standard is a subjective one — there must be sufficient evidence to permit the conclusion that the defendant actually knew the statement was false or had a high degree of awareness of probable falsity.

Without the actual malice standard, would-be critics of official conduct may be deterred from voicing their criticism, even though it is believed to be true and even though it is, in fact, true, because of doubt whether it can be proved in court or fear of the expense of having to do so. They tend to make only statements which steer far wider of the unlawful zone. A rule that allows recovery for defamation of public officials without providing actual malice thus dampens the vigor and limits the variety of public debate. It is inconsistent with the First and Fourteenth Amendments.

Washington Post Co. v. Keogh, 365 F.2d 965 (D.C. Cir. 1966)

Malice for the purposes of the actual malice test does not mean animosity, hostility, vindictiveness, or negligent disregard of reputation. While those factors may be relevant, they do not by themselves establish actual malice. Instead, actual malice must be shown only through knowledge of falsity or reckless disregard of truth or falsity. In this case, actual malice was not shown when a congressman sued a newspaper for printing accusations of bribery in a

syndicated column that had not been verified. Actual malice could not be shown where (1) those involved in publishing the column for the newspaper testified that they had no reason to believe or evidence causing them to suspect the information contained in the column was false and (2) there was no evidence that contradicted or called into doubt that testimony. The fact that the author of the column had had made erroneous statements on a few prior occasions and that he had a controversial reputation was not sufficient to prove the newspaper acted with reckless disregard for the truth in publishing the column as issue here. Nor was the newspaper required to verify the information in the column before publishing it where they had no reason to doubt the information.

Palin v. New York Times Co., 113 F.4th 245 (2d Cir. 2024)

The plaintiff must prove actual malice by clear and convincing evidence. This means that it is not enough for the plaintiff merely to assert that the jury might, and legally could, disbelieve the defendant's denial of legal malice. Rather, a plaintiff must offer some degree of concrete evidence from which a reasonable juror could return a verdict in her favor on the question of actual malice, that is, that the statement is made with knowledge of falsity or reckless disregard for the truth.

Schiavone Const. Co. v. Time, Inc., 847 F.2d 1069 (D. Morgan 1988)

Actual malice cannot be imputed merely because the information turns out to be false. An erroneous interpretation of the facts does not meet the standard of actual malice. However, where the defendant finds internal inconsistencies or apparently reliable information that contradicts its libelous assertions but nevertheless publishes those statements, the actual malice test can be met. Additionally, a defendant subject to the actual malice standard cannot automatically ensure a favorable verdict by testifying that he published with a belief that the statements were true. Therefore, objective circumstantial evidence can suffice to demonstrate actual malice. Such circumstantial evidence can override defendants' protestations of good faith and honest belief that the report was true. On the other hand, as long as the sources of libelous information appear reliable, and the defendant had no doubts about its accuracy, the evidence of malice is insufficient to support a jury verdict even if a more thorough investigation might have prevented the admitted error.

Harte-Hanks Communications, Inc. v. Connaughton, 491 U.S. 657 (1989)

The fact that a newspaper has departed from its usual practices in publishing a story is not enough, standing alone, to establish actual malice. Although the departure from professional standards may be relevant and probative evidence, it is not determinative. In this case, a jury's finding of actual malice in a newspaper's reporting of allegations against a political candidate was supported by evidence of the newspaper's failure to listen to tape recordings of

conversation which the candidate made available to the newspaper and failure to contact a major witness who should have been able to confirm or deny the allegations. The jury could conclude that the newspaper's failure to take these actions was a product of a deliberate decision not to acquire knowledge of facts that might confirm the probable falsity of the article. Although failure to investigate will not alone support a finding of actual malice, the purposeful avoidance of the truth is in a different category and can give rise to a finding of actual malice.

Curtis Publishing Co. v. Butts, 388 U.S. 130 (1967)

Actual malice could be found where the newspaper published an article accusing a college football coach of fixing games where the coach and his daughter notified the editors of the newspaper that the story was false before it was published, and the newspaper took no investigatory steps to confirm the information in the story. Evidence that the newspaper had embarked upon a program of "sophisticated muckraking" designed to "provoke people, make them mad" to increase sales was relevant to, but not dispositive of, actual malice.

Nunes v. WP Co. LLC, 737 F. Supp. 3d 7 (D.D.C. 2024)

Newspaper publisher and reporter did not act with actual malice by writing and publishing an article attributing to a former Congressman baseless claims by then-President of United States that his private property was wiretapped during his presidential campaign by former President's administration and thus were not liable for defamation, even if the Congressman had actually stated that President's claims of spying were unfounded, where the statement published in newspaper was based on a good faith misreading of source material with ambiguities, such that reporter simply made a mistake when she wrote article in question.

LIST OF WITNESSES

The plaintiff and defense must call each of their respective witnesses but may do so in any order. All witnesses have gender-neutral names and may be played by any gender.

For the Plaintiff:

- **Devan Rice:** Plaintiff, Former President of Skyview University
- **Shawn Sonti:** Private Investigator
- **Presley Kurthi:** Student at Skyview University

For the Defense:

- **Dakota Saravana:** Defendant, Editor-in-Chief of *The Chronicle*
- **Justice Marlow:** Faculty Advisor for *The Chronicle*
- **Kendall Rose:** Informant, Student at Skyview University

STATEMENT OF DEVAN RICE

1 My name is Devan Rice, and I am the former president of Skyview University. I grew up right
2 here in Morgan, Virginia, and have been a fan of Skyview for as long as I can remember. Both of
3 my parents and three of my grandparents were proud alumni of Skyview, so you can say it runs
4 in the family. After graduating from high school, I was so excited to be admitted to Skyview, and
5 I quickly found a home for myself in the Journalism Department, where I graduated *magna cum*
6 *laude* and wrote my thesis on the ethics of journalism. I didn't have time when I was a student
7 to get involved in the school paper, *The Chronicle*, but no one who has a real interest in
8 journalism took it seriously back then or now for that matter.

9 After completing my undergraduate degree, I decided that what I really wanted to be
10 was a journalism professor. I love everything about higher education — the academics, the
11 community, and the school pride. So, I completed my master's and PhD in journalism at the
12 Columbia Graduate School of Journalism. I loved living in New York City, but I always knew I
13 wanted to come back to Morgan and my beloved Skyview University. I was very lucky after
14 graduation to be hired as a tenure-track faculty member in the Skyview Journalism Department
15 and received tenure a few years later. A couple of years after that, I became the chair of the
16 department and realized that I loved being in administration. After five years of being the chair
17 and building the department into a leader in academic research in journalism, I was recruited to
18 serve as Dean of Northwestern's School of Journalism. It was tough leaving Skyview, but it was
19 too good of an opportunity to pass up. After five years at Northwestern, my dream job opened
20 up, the president of Skyview University. I thought I was a long shot to get the position, but I
21 guess my strong ties to the University gave me a leg up on the competition, and in 2018, I was
22 named the 27th president of Skyview University. I never could have imagined when I was a
23 freshman starting at Skyview that someday I would be the president of the university I loved.

24 I know what some people say about me though: I only got the job because I am a
25 member of The Crow & Eye Society. People have tried to attribute my successes to being a
26 Crow since I got into Columbia, and it was a common refrain when I became the youngest chair
27 ever of the Journalism Department after only a few years teaching at Skyview. People always

want to hate on the Crow & Eye because they think it controls everything at Skyview and in Morgan, but that's not at all what the Crow & Eye is. It's just a social club; we're not some secret society pulling the strings behind everything that happens at the university. I mean yes, the last four presidents have been members of the Crow & Eye, and we do have a lot of other influential members. And yes, I am a third-generation member of the Crow & Eye on both my mother's and father's sides. And yes, the Crow & Eye's meetings are not open to the general public and there are some rituals that I can't share. But that's just part of the mystique of the Crow & Eye Society. What I can tell you is that being part of the Crow & Eye and everything I learned as a member has made me a better leader, which was key to being selected as president and all my successes as president.

Being president of a university definitely isn't easy, though. You have to make some tough decisions, and, unfortunately, you also make enemies when people don't like your decisions. That's why we are here today. There were some people at Skyview who just hate my guts for the reforms and changes I've made as president, and they would stop at nothing to get rid of me.

One of my main goals as president was to make Skyview more focused on academic research and less on being a place where students learn a trade. Academic research is what brings in the big dollars — both in the form of grants and philanthropy — and as president, I needed to bring more money to Skyview. One of my main focuses was reforming my old department, the Journalism Department. In my absence, it had lost almost all of its focus on academic research and had become too focused on teaching practical skills of journalism.

There was also no focus on journalism ethics, which is my specialty. So, I made some big changes, including requiring all faculty to publish research articles in academic journals and requiring all students who worked for *The Chronicle* to complete a journalism ethics course. As part of that course, the students study the Society of Professional Journalists (SPJ) Code of Ethics, and the course is designed to make sure the students understand the power and responsibility of journalists to seek out and ensure they are publishing the truth.

Some people loved the changes, but others hated it. One of the people who hated it most was Professor Justice Marlow. Marlow joined the Journalism Department sometime after

I left to be the dean at Northwestern. To say we don't see eye to eye when it comes to journalism would be an understatement. Marlow got their start with a podcast or something. Basically, Marlow was at the right place at the right time, cracked some big story, and won a Pulitzer for it. Because of that, Marlow managed to worm their way into the university and use their fame to get a tenured position with the department.

But the thing is, Professor Marlow has no business in the world of academia. Marlow hasn't published a single research article or been published in a reputable journal since coming to the university — or ever for that matter! Call me old-fashioned, but one popular podcast series and a couple of high-profile news articles do not make one qualified to teach the next generation of investigative journalists. At one faculty meeting, Marlow said right to my face that I was "ruining the department" and that "ethics don't matter in journalism; all that matters is publishing the story." I couldn't disagree more.

I also knew that Dakota Saravana resented the journalism ethics course because it made it harder to recruit reporters for *The Chronicle* and to get them to write the kind of stories Saravana wanted, that is, risqué tabloid-like stories. Saravana never said anything to me directly about my changes, but a faculty member told me that Saravana said in class one time that "Rice is the worst president ever and is completely out of touch with the student body." The professor also said that Saravana said that "it's a good thing that some of us have the power of the press that we can use to stop Rice. All it will take is one negative story; it doesn't even matter whether it is true." I didn't think much of it at the time, but given all that has happened, I should have taken that threat more seriously.

Not everyone felt the way that Saravana did about my work as president. The Board was thrilled by the changes I made, and our enrollment numbers and rankings were way up. I also knew that as much as I love the Crow & Eye Society and my fellow members, as president, I needed to distance myself from the Crow & Eye. I wanted to make it clear that I was the president for everyone at Skyview and, unfortunately, the Crow & Eye is viewed by many as elitist and exclusive. It's fairly natural for anyone not part of a secret, exclusive club to feel hostile toward the people in that club.

85 There was also the issue of the Crow & Eye's initiation ritual, which was leaked a few
86 years back and which some people view as hazing. Some members of the Crow & Eye have
87 taken things a bit too far in the past with hazing. Let me just say that I have zero tolerance for
88 anything that puts others in harm's way. That's why I stopped attending Crow & Eye meetings
89 and stopped being involved in any way in the operations of the organization. I knew I had to
90 take a stand, even if it was against a society I used to be a part of. Sure, I still talk to my old
91 friends from the Crow & Eye from time to time and they keep me updated on what is going on,
92 but I'm not involved at all in the decision making or the day-to-day of the organization.

93 In fact, I took steps to stop all forms of hazing on campus, even though I knew it would
94 make me enemies. We now have mandatory training for all students who are part of
95 fraternities and sororities and athletic teams and an anonymous hotline for reporting hazing.
96 Anyone found to be involved in hazing is immediately put on academic probation and must
97 appear before the student disciplinary board. Depending on the severity of the case, students
98 can be expelled for participating in hazing.

99 One of the most dangerous forms of hazing at Skyview University was the Crow & Eye's
100 initiation ritual. I'll tell you what I can about the Crow & Eye Society, at least what is already
101 well-known by the general public. Like other members, I was sworn to secrecy on the rest. The
102 Crow & Eye Society has existed almost as long as the university itself. It was originally founded
103 as a way to identify and bring together members of the student body who had proven
104 themselves to be leaders and students who would go on to do great things. The name of the
105 society is a reference to Norse mythology: the god Odin, to be precise. Odin is the god of
106 wisdom, death, magic, and war. He is often called Odin One-Eyed because he sacrificed his eye
107 to obtain his wisdom. So, the "Eye" part of Crow & Eye is to remind members that great
108 wisdom sometimes requires great sacrifice. The "Crow" part is a reference to Odin's ravens:
109 Huginn (thought) and Muninn (memory). Odin's ravens would fly around the world and gather
110 information and bring it back to Odin. The Crow & Eye Society has a strong alumni network that
111 stays well-connected and helps one another out, so, in a way, the members go out into the
112 world like the crows, and that makes the society strong.

113 Anyway, after a student has been tapped to join the Crow & Eye Society, they have to
114 undergo the initiation ritual. As part of this ceremony, the prospective students climb the tallest
115 tree on campus where certain crow feathers have been hidden among the branches. I knew I
116 could never convince the society to willingly stop the ritual — tradition and all that — but I
117 could try to stop it by putting up barriers. I had our facilities department put up signs around
118 that tree warning people about the danger of climbing. The signs say DANGER in large letters so
119 it is clear to everyone not to climb the tree. A brick wall was also built around the base of the
120 tree to keep people away. I thought it was working until the tragic death of Lee Reddy IV.

121 Reddy's death was a tragedy for the entire Skyview community. I was out of town
122 traveling to meet with a wealthy donor and received a call at 3 AM from the Skyview University
123 Chief of Police that a student had fallen while climbing the tree and had died. I immediately
124 suspected that it was related to hazing. I knew we should have had the tree cut down, but the
125 Board simply refused to destroy such a recognizable part of Skyview's history. I later learned
126 that it was in fact a hazing incident involving the Crow & Eye having students climb the tree. I
127 was shocked and devastated that the organization that I cared so much about had continued to
128 engage in such dangerous activities. But to be clear, I had no knowledge that the current
129 members were planning to engage in hazing, and I had no involvement whatsoever in planning
130 the initiation activities that led to Reddy's death. The leader of Crow & Eye did reach out to me
131 about speaking at an off-campus ceremony, but I declined the invitation and made clear that I
132 did not condone anything that put students at risk. Exhibit 12 is a copy of these email
133 communications.

134 Still, I knew that some people, like Saravana and my detractors in the Journalism
135 Department, would seek to blame me for what happened. Saravana started publishing opinion
136 pieces in *The Chronicle* attacking the Crow & Eye Society and its members for Reddy's death.
137 *The Chronicle* never mentioned me by name, but the implication was that I was guilty by
138 association with the Crow & Eye. Between the articles in *The Chronicle* and the public outcry, I
139 knew I needed to do something. So, one week after Reddy's death, I issued a public statement
140 saying that the University would be hiring an external investigator to conduct an independent
141 investigation regarding Reddy's death. We hired Shawn Sonti to conduct that review because of

142 their extensive experience as an investigator and specifically with secret societies and hazing.
143 Sonti reported directly to the Board, and I had no influence over their investigation; they also
144 had full access to all records and employees of Skyview.

145 The Sonti Investigation's conclusions were what I had suspected all along. The report
146 also fully exonerated me, finding that there was no evidence that I had any knowledge or
147 involvement with the hazing activity. I thought that would be the end of it, but the Sonti report
148 only inflamed Saravana's vendetta against the Crow & Eye and its members. One time, I was
149 speaking with some donors at a basketball game and Saravana started yelling at me how I was
150 responsible for Reddy's death and that I would pay for it. Saravana also said something like,
151 "You just wait. I'm going to find the evidence that you were involved, even if I have to make it
152 up," or maybe it was "even if it takes all year." It was pretty loud at the basketball game, so I
153 can't be sure. Either way, it was clear to me that Saravana was still very angry with me and out
154 to get me.

155 Part of being president is dealing with difficult press, so I didn't let *The Chronicle* articles
156 bother me, especially because they didn't mention me by name and were mostly opinion
157 pieces. But that all changed on March 13, 2024, when *The Chronicle* published an article titled
158 "New Evidence Proves President Rice's Involvement in Reddy's Death." The article cited an
159 anonymous source saying that I did have knowledge about the hazing that resulted in Reddy's
160 death and that I was present at the initiation ceremony and even alleged that I led the
161 ceremony.

162 The reporting was completely false, and it was clear to me as someone who has studied
163 journalism that the article was sloppy and hastily written and that nothing had been done to
164 check the anonymous source's information. I mean I wasn't even in town when the hazing
165 incident occurred and that could have been easily verified by contacting my office and asking
166 for my schedule. Exhibit 3 is a copy of my travel itinerary from my trip. I know Saravana says
167 that they reached out to my office for comment, but my office keeps logs of all calls, and we
168 didn't have any record showing that Saravana had called. I think they are just making that up
169 now to cover their shoddy investigation.

170 The article claimed I was present because someone had seen my car on campus and a
171 light on in my office. But I left my car on campus because I took a taxi to the airport and was
172 planning on coming back to campus after my trip to get it. Again, all of that could have been
173 verified had *The Chronicle* bothered to contact my office. Even if they didn't contact me, Presley
174 Kurthi, who is a reporter for *The Chronicle*, was with me when I was leaving campus that night
175 and would have confirmed that the information from the anonymous source was incorrect. I
176 even have the handwritten receipt from the taxi (I needed it for reimbursement) and could
177 have produced it if Saravana had bothered to ask. For old-school taxis, when you pay in cash,
178 you write down your destination and other information on a little slip that the taxi driver gives
179 you. Exhibit 14 is a copy of the receipt from the taxi on October 13, 2023.

180 And I don't know why the light would have been on in my office, but it's not that odd for
181 the light to be on in my office while I'm away. It easily could have been the cleaning staff or
182 someone getting something from my office. *The Chronicle* and Saravana didn't check any of the
183 facts and just jumped to conclusions. They didn't even give me the courtesy of contacting me to
184 respond to the allegations and deny them as required by the SPJ Code of Ethics. Not that I'm
185 surprised since Saravana clearly didn't care at all about journalistic ethics. It was exactly the
186 kind of tabloid story that we'd come to expect from *The Chronicle*.

187 As soon as I saw the article, I summoned Professor Marlow to my office because in
188 addition to being a faculty member they are the faculty advisor for *The Chronicle*. When
189 Marlow arrived, I let them have it. I was so mad about the article that I wasn't really thinking
190 straight. I told Marlow I would hold them personally responsible for the article and that if they
191 ever wanted to work in journalism again, they needed to fix this. I even probably said
192 something about having friends in powerful places so that Marlow understood my point.
193 Marlow looked very scared and blurted out that they hadn't seen the article before it was
194 published and that Saravana had published it without going through the normal processes.
195 They also acknowledged that they didn't know what research or investigation had been
196 conducted and that if they had written the story for a newspaper they would have made sure
197 to vet the source before publishing. They said they would talk to Saravana about publishing a
198 retraction and then left quickly. No retraction was ever published.

199 I later learned that the anonymous source was Kendall Rose, a disgruntled member of
200 the Crow & Eye. I never had any direct interactions with Rose before, and I have no idea why
201 Rose would lie about me or try to harm me. But what Rose said about me is simply false, and
202 any serious reporter would have figured that out had they even bothered to do a cursory
203 investigation. And Saravana and *The Chronicle* should have been suspicious of the supposed
204 evidence the anonymous source claimed to have found since it could have only been obtained
205 illegally or fabricated. Again, there was nothing in the article suggesting that *The Chronicle* had
206 taken any steps to verify the supposed evidence. Instead, blinded by their hate for me,
207 Saravana just ran with the story without caring whether it was true, exactly as they said they
208 would.

209 I tried to explain to the Board that *The Chronicle* story was false, but the damage had
210 been done. News travels fast in Morgan, and Skyview University is a key part of the community.
211 *The Chronicle* is read by the entire city, not just the university. And this all happened before the
212 murder of Michael Javonne in May, so it was all anyone was talking about for a while. It got so
213 much attention that national news outlets started picking up the story and Skyview University
214 suddenly became synonymous with hazing and deadly secret societies.

215 With all the bad press, the Board decided that there was no way I could continue as
216 president. They gave me the option to resign, but since I didn't do anything wrong, I refused to
217 resign and the Board fired me. Now, my reputation is ruined, preventing me from finding any
218 other job. My only chance to get hired again as a university leader is to prove that *The Chronicle*
219 story is false. That's why I filed this lawsuit: to clear my name and hold accountable those who
220 defamed me. I don't want to hurt *The Chronicle*, and I value the importance of journalism. But
221 reckless disregard for the truth has no place in ethical journalism. I hope that by holding those
222 responsible for this defamation, it will send a lesson to the future leaders of *The Chronicle* that
223 they need to take their responsibilities and ethics as journalists seriously.

STATEMENT OF SHAWN SONTI

1 My name is Shawn Sonti. I'm pretty well-known in Virginia as the person you call when
2 you want to find out the truth. Once I'm hired, I always get to the bottom of the case. That's
3 why they call me "The Mole," because I always dig up the truth. I've been doing investigations
4 for more than 30 years and know all the tricks for finding out what really happened.

5 In high school, I started a business solving mysteries. If you've ever read the
6 Encyclopedia Brown books, that's basically what I was doing. Didn't get paid much, but it was
7 fun. After graduating from James Madison University with a degree in psychology, I got a job
8 working as an investigator at the CIA. I can't really talk about the specific things I worked on
9 because that is classified, but I can say that I did all kinds of investigations all over the world.
10 That's where I really learned how to investigate. The key to doing investigations is to question
11 everything and not take anything at face value, especially when someone isn't willing to put
12 their name behind an accusation. Sure, every investigator has relied on an anonymous source
13 before, but a good investigator knows you always have to check your source before you can
14 trust it, and with anonymous sources, that can be tough.

15 After 10 years of working at the CIA, I wanted a change of pace and didn't want to travel
16 internationally as much, so I decided to open my own private investigation firm. That was 30
17 years ago, and now my company "Dig up the Truth" is the top private investigation firm in the
18 Commonwealth of Virginia. Maybe you've seen our ads: they are the ones with the giant mole
19 digging around to solve a mystery. I've been hired by all kinds of companies and individuals to
20 investigate things. Everything from finding a lost dog to corporate espionage. A few times I've
21 even been hired by newspapers or TV news stations to help them investigate a story. That's not
22 a big part of my work though because journalists don't pay as well as corporations or wealthy
23 individuals who have had something stolen. But no job is too big or too small for The Mole. I've
24 done about five cases where I was working as a private investigator for a journalist.

25 One of my specialties is conducting investigations related to secret societies. Those
26 investigations almost always go hand in hand with corruption scandals and white-collar crime.
27 Secret societies are really tough groups to investigate because of the whole "secret" part. But

28 I've had some success infiltrating them. (Some of the skills I learned in the CIA come in handy.)
29 The key is to find a reliable source within the group who can feed you information about what
30 is really going on within the ranks.

31 My interest in secret societies is also personal. It started when my nephew died as a
32 result of hazing while he was trying to join a secret society at a college in Connecticut. Ever
33 since then, I've dedicated myself to dismantling these groups and preventing other young
34 people from being hurt by these dangerous organizations. I've done many investigations of
35 hazing deaths, and secret societies are the most dangerous types of organizations. Hazing
36 deaths that arise out of secret societies are often more difficult to investigate because they
37 have certain characteristics that set them apart from your average fraternity or sorority.
38 First, they are secret, which means members are good at keeping silent and hiding evidence.
39 Second, they have long-standing traditions that don't change despite how dangerous they are,
40 and they don't typically bend to outside pressure. Finally, the alumni are usually involved and
41 protect the organization because they want to preserve the traditions. It's just a recipe for
42 someone to get hurt or, even worse, die.

43 In addition to working as a private investigator, I've also given lectures and taught
44 classes on investigations and investigation techniques. I've probably given about 30 lectures or
45 classes on these topics. One of the things I cover in these talks is the importance of being aware
46 of biases that can color how you conduct the investigation and the conclusions you draw. The
47 study of biases is a field within psychology. Given my background in psychology, I have
48 specialized in applying what we know about biases to all types of investigations.

49 There are several biases that can impact any investigation. If you aren't aware of your
50 biases, they can easily lead you to the wrong conclusion. You can never fully eliminate your
51 biases — they are part of you — but you can be aware of them and take steps to check that
52 they aren't improperly influencing your investigation or conclusions. For example, I know that I
53 have a strong dislike of secret societies because of what happened to my nephew, and this
54 could potentially cause confirmation bias. A confirmation bias is when you favor information
55 that confirms a preexisting belief. In my case, I am aware that I will have a tendency to favor
56 information that confirms my belief that secret societies are dangerous. And because I know

that I have that bias, I also know how to mitigate the impact of it. I'm usually able to prevent it from impacting investigations I do about secret societies.

Confirmation bias is probably the most common bias I see impacting someone's investigation. People are often bad at identifying their own preexisting beliefs and the impact those beliefs can have on their conclusions. A good investigator should be skeptical of everything and actively look for information that might disprove what they believe to be true. It's also a good idea to have someone else review the evidence and see whether they reach the same conclusion.

Another common bias that often affects investigations is anchoring bias. Anchoring bias is the tendency to put too much emphasis on the first piece of information that one encounters during an investigation. People tend to build their investigations off of that first piece of evidence and then never go back and question that piece of information again. If an investigator doesn't correct for biases such as confirmation bias and anchoring bias, then they run the risk of reaching false conclusions and disregarding the evidence that shows that their conclusion is false.

I first became involved with Skyview University and President Rice when I was asked by the Board of Visitors of Skyview University to conduct an independent investigation into the death of Lee Reddy IV. I was hired because of my experience as an investigator and my specialty investigating matters involving secret societies. I was given full autonomy to conduct my investigation as I determined was necessary, and I reported directly to the Board of Visitors, not President Rice. I was asked to determine whether any Skyview employees, including President Rice, were aware of or involved with the hazing that led to Reddy's death. I was paid \$75,000 for the investigation, which is my standard rate for conducting investigations such as this.

In conducting the Skyview investigation, I followed my normal procedures, which are consistent with the standard for conducting investigations. I first started by collecting documents from Skyview that were relevant to my investigation. This included evidence about where President Rice was at the time of the hazing incident. Exhibit 3 is one of the documents I collected from Skyview that shows President Rice's travel out of the state at the time of the hazing incident. I also reviewed emails to and from President Rice, including Exhibit 12. Exhibit

12 was relevant to my investigation because it shows that President Rice was still in communication with members of the Crow & Eye in the months before the hazing and also shows Rice telling the members of the Crow & Eye that Rice would not tolerate them engaging in dangerous hazing activities, including climbing a tree on campus. This also demonstrated that President Rice was aware of the initiation and hazing practices of the Crow & Eye in the past. But I could find no written evidence that Rice had knowledge of the plans for this year or was involved in the initiation or hazing on the night Reddy died. To the contrary, the written evidence supported Rice's account that Rice was not involved in or aware of the hazing.

In conducting an investigation, you cannot just rely on documents. You also need to conduct interviews so that you can confirm the truth of any documents you receive. This is especially true when there is reason to doubt the truth of what is in the documents. I interviewed President Rice's executive assistant, and they confirmed that President Rice was scheduled to travel to California as described in Exhibit 3.

I also conducted an interview with President Rice. They confirmed that they were an alumni of the Crow & Eye Society and did keep in touch with some members of the society. However, Rice said that since becoming president, they had distanced themselves from the Crow & Eye and had no involvement with the organization. President Rice also explained the steps they had taken to address hazing on campus and make Skyview a safe campus for all students. These measures included implementing mandatory training for all organizations regarding the dangers of hazing, creating an anonymous helpline that students could use to report hazing incidents, building a medium-sized brick wall around the largest tree on campus, and putting up signs that said "danger" around the tree.

I have to admit that I was skeptical of President Rice's denial of involvement at first. My initial assumption was that they were likely involved given their past history with the Crow & Eye. In my experience, it is very unlikely that alumni, particularly alumni who have obtained high levels of power at a university, distance themselves from campus secret societies. One of the main reasons secret societies have been successful and are able to recruit new members is that they have access to those in power at the university and can use that to benefit their members. But, with my training, I am very good at detecting when someone is lying, and after

meeting with President Rice, I believed them. Plus, there was absolutely no evidence that I could find linking President Rice to the hazing incident or any recent, direct involvement with the Crow & Eye. As I mentioned above, a good investigator has to check their confirmation bias and other biases and not let those biases lead an investigator to a false conclusion. That's what I had to do here and follow the evidence, which confirmed that President Rice was not involved.

While I had full cooperation from Skyview and its employees, I was not able to gain access to the Crow & Eye members to interview them. I tried numerous ways to get in touch with them, but no one would speak with me. I wish that I had the opportunity to speak with at least some Crow & Eye members who were present when Reddy died. But in any investigation there will be some information you aren't able to get, and you just have to do the best with the information you are able to collect.

After completing my investigation, I gave an oral report to the Board of Visitors and prepared a short executive summary of my findings, which is Exhibit 4.

After completing my investigation and getting paid, I thought I was done with this matter. But then I heard about the story in *The Chronicle* claiming that President Rice was involved in the hazing. I got pretty nervous when I heard about the story, because it definitely would not be good for business if some college journalists were able to find evidence of Rice's involvement when I couldn't. But after reading the story, I realized that there were some pretty big holes in the story and that they hadn't done any fact checking of the information from the anonymous source. I was also pretty skeptical of the anonymous source because they could have shared the "evidence" they had with me during my investigation but chose not to. The fact that they kept this supposed "evidence" from the person hired by the university to conduct an investigation should have raised questions for *The Chronicle* about the veracity of the evidence they provided.

Then President Rice's lawyers called me and asked whether I would be willing to serve as an expert in this case. At first, I wasn't sure about being an expert witness. I didn't know whether I was a good fit for a case about journalism and defamation. I'm not a journalist, even though I have done some investigations for newspapers and journalists. But the more I thought about it, conducting a sound investigation is the same regardless of whether you are a

144 journalist or a private investigator. It was also my reputation on the line given the conclusion of
145 my investigation was being called into question. So, I agreed to serve as an expert witness. I'm
146 being paid \$200 per hour to prepare, and spent 50 hours preparing, plus \$10,000 for testifying.

147 As part of reaching my expert conclusions in this case, I've reviewed the available
148 exhibits and the affidavits of the witnesses. My methodology is consistent with the standard in
149 my field for reviewing investigations. After reviewing the investigation conducted by *The*
150 *Chronicle* and Saravana, it is my expert opinion that there were numerous flaws in the
151 investigation and that Saravana ignored clear signs that the story they published was false and
152 acted with actual malice. For example, there were obvious reasons for Saravana to doubt the
153 veracity of the anonymous source's information, including the information contained in my
154 report, but Saravana and *The Chronicle* took no steps to check the information provided by the
155 source. One of their own reporters, Kurthi, told them that the story was not true and provided
156 eyewitness testimony to disprove the alleged "facts," but Saravana and *The Chronicle*
157 proceeded to publish the false information anyway, which is very concerning. It's investigation
158 101 that if someone credible tells you that information isn't true, you need to investigate
159 further. As far as I can tell, Saravana just disregarded what Kurthi told them without doing any
160 investigation to determine whether Kurthi or the anonymous source was telling the truth. This
161 was all, of course, compounded by the fact that President Rice had documentation showing
162 that the business trip was real.

163 Additionally, *The Chronicle* and Saravana made no attempt to verify the identity of the
164 anonymous source before publishing the story, even though there was some evidence of the
165 person's identity. Had they done so, they would have been able to check to see whether that
166 person had any reason to want to harm President Rice.

167 Saravana also failed to conduct any interviews at all before publishing the story. I saw no
168 evidence that Saravana tried to contact President Rice, their executive assistant, or any of the
169 other witnesses I interviewed, despite knowing that they had information that would disprove
170 the information provided by the anonymous source. Saravana also didn't do anything to try to
171 contact members of the Crow & Eye to see whether they had information that would

corroborate or disprove the story. I don't know whether the Crow & Eye members would have talked to *The Chronicle* given that they wouldn't talk to me, but they didn't even try.

Another issue with *The Chronicle* and Saravana's investigation is that they did not follow their own internal procedures and instead rushed the story to print. There was no secondary review of the story as required by *The Chronicle's* procedures, and Saravana did not have *The Chronicle's* advisor review the story as is also required by the procedures.

Saravana also took no steps to correct for their own bias against President Rice and their confirmation bias and anchoring bias. Saravana was blinded by their own personal feelings about the Crow & Eye Society and their anger toward President Rice, whom they blamed for Reddy's death. Saravana fell victim to confirmation bias when they received information from the anonymous source that confirmed what they already believed to be true. And they did nothing to check that confirmation bias or verify the truth of the information because it confirmed what they already believed to be true. Additionally, Saravana anchored their entire story around the initial information received from the anonymous source and never questioned it again, despite there being ample evidence to the contrary.

Finally, while I'm not an expert on journalism ethics, I did review the Society of Professional Journalists Code of Ethics, which I consider to be an authoritative source on journalistic ethics. Saravana and *The Chronicle* clearly violated several of the ethical norms, including but not limited to ones about sources and subjects of articles. For example, they didn't verify the information before releasing it and didn't give the subject of the article an opportunity to respond or deny the alleged wrongdoing.

Simply put, *The Chronicle* and Saravana failed to conduct any significant investigation before publishing the story. Instead, they just accepted as true the information given to them by the anonymous source despite obvious indications that it was false. Their investigation clearly fell below the standard for investigations. It is my expert opinion that Saravana and *The Chronicle* acted with actual malice when publishing the article in that they knew the article was false or acted with reckless disregard for the truth. As I always say, "You can't find the truth unless you are willing to dig for it," and Saravana and *The Chronicle* definitely didn't do any digging for the truth here.

STATEMENT OF PRESLEY KURTHI

1 My name is Presley Kurthi, and I am currently a student at Skyview University in
2 Morgan, Virginia. I will graduate in May 2026 with a double major in journalism and political
3 science. My dream is to become a world-renowned journalist. But I'm not just going to write for
4 a local newspaper and call it a day. Print media is basically dead anyway. I'm going to be on TV
5 interviewing celebrities, politicians, academics, you name it. Move over Anderson Cooper —
6 Presley Kurthi is coming for your gig.

7 But I'm getting ahead of myself. I know that before you can make it big, you have to pay
8 your dues — and believe me, I know a thing or two about paying my dues. For example, I knew
9 that even though print media is on its way out, I needed some of that old school credibility a
10 print newspaper can give you. That's why I immediately joined *The Chronicle* once I enrolled at
11 Skyview University. *The Chronicle* is the school newspaper, but it has a surprisingly long reach.
12 Skyview University is a big part of the fabric of Morgan. It attracts students from all over
13 America, and then a lot of those students stay and put down roots in Morgan. With so many
14 alumni around, plenty of people in the city read *The Chronicle*, so we cover more than just
15 what's going on at the university. And there's plenty to write about! Right before I started my
16 freshman year in 2022, there was that kid who fell off a cliff while at a summer camp hosted at
17 Skyview. My whole freshman year and a good part of my sophomore year, I followed that story
18 from start to finish. Then, of course, in 2024, there was the murder of Michael Javonne. The
19 whole city couldn't get enough of the news stories about what had happened and what was
20 going on with the trial. I kind of felt like a minor celebrity when people would tell me they read
21 my articles and wanted to ask me how I thought the trial would turn out.

22 I worked my butt off in both my journalism classes and my job at *The Chronicle*. I made
23 sure that by the end of my freshman year, everyone knew my name on campus. It wasn't really
24 a surprise when I got tapped to join the Crow & Eye Society. The Crow & Eye Society is basically
25 the worst-kept secret on campus. Anyone who is anyone and went to Skyview University was a
26 member of the Crow & Eye. It's a secret society that pulls its members from the elite members
27 of the student body. Basically, it's the leaders of the student organizations, the top academics

in a given class, star athletes, and, well, yes, children of wealthy donors. But even though my family is well off, that's not what got me into the society. I made it purely on merit.

Anyway, I was thrilled when I was tapped to join the Crow & Eye. As the future voice of America, I knew that I needed powerful connections so that I could keep my finger on the pulse of what was really happening in this country. I may have worked extremely hard to be the top of my class, but I'm not a fool: I know it's not just what you know, but who you know that really matters.

A lot of what goes on within the society is a secret, and I can't talk about it. But I can talk about the stuff that the public generally knows about. For example, everyone pretty much knows that the name comes from Norse mythology. A lot of the symbolism, rituals, and traditions are deeply rooted in Norse mythology and Viking history. The central figure is, of course, Odin Eye-One, the all-father and leader of the Norse gods. It isn't religious or anything; it's more like this thing we all use to connect with one another. Although I will say that everyone takes the traditions of the society really seriously. When you do the rituals, you know that every other member who came before you did it too, and there's something really cool and almost spiritual about that.

Anyway, if you crack a textbook on Norse mythology, you can probably figure out a lot of the symbols. Odin is the god of magic, wisdom, death, and war. He gave up his eye for wisdom. So, a big thing in the Crow & Eye is that we are always seeking wisdom and enlightenment, and we laugh in the face of danger and death. The crows, Memory and Thought, are symbolic of our really strong alumni network and how we share information and resources with each other.

The main ritual that got leaked several years ago that people know about is the initiation ritual. There's this beautiful southern live oak tree on campus that's hundreds of years old or something. It's absolutely huge with big branches that spread in every direction. The Crow & Eye refer to the tree as Yggdrasil, the World Tree. When prospective members are ready to be made into full-fledged Crows, we have a ceremony where we paint our faces and drink some adult beverages and then the initiates have to climb Yggdrasil and retrieve crow feathers that have been hidden among the branches. Once they find a feather, they hold it up

57 and caw three times. It's honestly a lot of fun, and everyone gets pretty into it. The members
58 overseeing the ritual are hooded until the end when they finally reveal themselves to the new
59 members.

60 I remember having a blast when I did it. I was initiated a year before Reddy was. My
61 memory of my initiation is a little fuzzy because the Blood (it's just fruit punch and vodka, don't
62 worry) was a little strong, but I don't remember the climb being difficult, and I remember
63 everyone being really supportive. I also remember that President Rice had recently put up
64 those signs and that brick wall around the tree. The wall isn't that high, so it wasn't that hard to
65 climb over. I also remember one of the hooded members pointing to one of the signs that said
66 DANGER and laughing. I was a little confused until I remembered that one of the core tenets of
67 the Crow & Eye is that we are supposed to seek out danger and conquer it to attain wisdom.

68 I guess I should mention that President Rice was a member of the Crow & Eye Society.
69 It's not a secret or anything — but President Rice was trying to keep distance from the society.
70 The president really cracked down on hazing. I'm in a Greek organization too, and we all had to
71 take this seminar on hazing where they told us horror stories about people dying from all kinds
72 of stuff like alcohol poisoning, drowning, falling into pits, and heatstroke. President Rice also
73 implemented this helpline that you could call anonymously to report hazing or to get help.
74 Then, of course, there was the fence and signs around the tree, and Rice even publicly
75 condemned the actions of the Crow & Eye for using the tree in its initiation ritual. I think that
76 ruffled a few feathers in the society. I never saw President Rice at any meetings or any
77 networking events among members.

78 But regardless of whatever President Rice's relationship with the society was at that
79 time, President Rice was still a Crow and also well known in the world of journalism. For me, the
80 whole point of joining the Crow & Eye was to make connections, and President Rice was a no
81 brainer connection for me. After the whole debacle with the Editor-in-Chief position at *The*
82 *Chronicle*, I managed to secure a position on the Student Council thanks to the Crow & Eye. In
83 that position, I began regularly meeting with the president as part of my Council duties, and I
84 made a really good connection with President Rice. President Rice was a great mentor, and I
85 would often stop by their office to have tea and talk about my career and get advice. President

86 Rice even offered to write me recommendations for when I applied for journalism jobs after
87 college. That would have been a great help for my career, but I'm not sure how helpful the
88 recommendations will be now with all the controversy and President Rice getting fired. I really
89 hope this trial clears President Rice's name.

90 In fact, I was at President Rice's office on October 13, 2023. It was in the afternoon on a
91 Friday, and I had stopped by to ask President Rice's advice about this summer job I was applying
92 for and had an interview for the next day. We had a nice conversation until President Rice
93 looked at their watch and explained that they had to catch a flight. President Rice said they
94 were just going to call a taxi to save the university money instead of paying for parking at the
95 airport. I was going to be driving back to my parent's house after I left the president's office
96 because I had the interview for that summer job the next morning, and I would be passing by
97 the airport on my way, so I offered to drive President Rice to the airport. President Rice said
98 they didn't want to impose and declined my offer. We talked until the taxi arrived, and I walked
99 out with President Rice, said goodbye to them as they got into the car, and it drove away. I
100 can't remember what kind of luggage President Rice had with them — maybe a large overnight
101 bag or something. Definitely not a roly suitcase. It probably wasn't a long trip. That was all
102 around 4:00 pm. I know because my class ended at 3:30 pm, and we were talking for about half
103 an hour.

104 I knew there was a Crow & Eye initiation that same night, but I couldn't make it because
105 of my interview. President Rice didn't say anything to me about it during our conversation and I
106 just assumed President Rice didn't know it was happening. Regardless, I know that President
107 Rice couldn't have been at the initiation that night because I saw Rice head to the airport in
108 that taxi.

109 Because I wasn't at the initiation ritual that night, I only heard about what happened
110 afterward. My friend, Quentin Shooglesbee, told me when I came back to campus on Sunday.
111 He was shaking and seemed scared out of his mind. He was talking really fast, and at some
112 points, I thought he was going to cry. He told me that Lee Reddy IV had fallen out of Yggdrasil
113 during the ceremony and died right in front of his eyes. He told me that when the police
114 showed up, everyone stayed quiet except Kendall Rose, who started "singing like a canary" and

115 saying all kinds of things. I know Kendall, unfortunately. Kendall was initiated at the same time
116 as me. They're supposed to be some kind of computer genius, but honestly, Kendall was a
117 mistake to welcome into the society. During our initiation, Kendall clung to the tree like more of
118 a scared cat than a fearless crow, and it really left a negative impression on all the members.
119 Kendall is just kind of spineless, always doing what they're told and letting people walk all over
120 them.

121 Anyway, Quentin told me that he saw Kendall talking to the police, and afterward he
122 confronted Kendall and demanded to know what they said to police. Apparently, Kendall just
123 stammered that they didn't really see or hear anything and that they were just really confused
124 by everything. Kendall insisted that everything happened too fast and they "didn't know
125 anything." But Quentin told me that he was really worried that Kendall had lied and made stuff
126 up to make the society look bad because Quentin knew that Kendall was mad about how they
127 were being treated.

128 Obviously, there was a lot of heat on the Crow & Eye after what happened to Lee Reddy
129 IV. The ritual with the tree is well-known enough that it wasn't a great mystery of what had
130 happened and that the Crow & Eye was involved. But then things got really crazy once Dakota
131 Saravana started using *The Chronicle* for their personal vendetta against President Rice.

132 I don't like Dakota Saravana. I'll admit it. Freely and gladly. We're in the same class and
133 started at *The Chronicle* at the same time. At first, I thought we could be friends. We shared a
134 passion for journalism, and Dakota struck me as ambitious like me. But Dakota turned out to be
135 the worst type of journalist. Dakota always wanted to publish the most sensational story, the
136 one that would get the most attention, regardless of whether it was true. For example, Dakota
137 kept trying to publish stories in *The Chronicle* about these wild conspiracy theories about what
138 was "really" happening on campus like the food in the cafeteria being mislabeled, the athletics
139 director taking bribes for sports scholarships, or the school knew that the belltower was being
140 haunted and wasn't doing anything about it. None of that was true, of course. I can think of at
141 least 10 different times Dakota presented a story that the faculty advisor had to shoot down
142 because Dakota hadn't done anything to corroborate the "facts" in the article.

143 Dakota and I were even in the same Ethics in Journalism class together. President Rice

144 made the class mandatory for all members of *The Chronicle*. I aced that class with flying colors.
145 Dakota got a B minus. If that's not foreshadowing, I don't know what is.

146 Unfortunately, Dakota found a kindred spirit in Professor Marlow, a faculty member in
147 the Journalism Department and the faculty advisor for *The Chronicle*. Like most people, I was
148 really excited when I first met Professor Marlow. Professor Marlow is basically famous for
149 hosting that hit podcast *One Hit, I Wonder*. Of course, I had listened to it, and I really admired
150 that Professor Marlow was able to save an innocent woman from prison through investigative
151 journalism. When I came to Skyview, I couldn't wait to meet Professor Marlow and learn from
152 someone I admired so much.

153 But Professor Marlow ended up really disappointing me. At the end of both mine and
154 Dakota's freshman years (2022–2023), we each threw our hats into the ring to be named
155 Editor-in-Chief of *The Chronicle*. Supposedly, to ensure the position is appointed on merit and
156 not a popularity contest, the faculty advisor gets to pick the Editor-in-Chief. I guess Professor
157 Marlow didn't care that Dakota cared more about sensationalism than the truth and was willing
158 to do anything to break a big story. Professor Marlow picked Dakota over me. I was devastated.
159 Becoming Editor-in-Chief of *The Chronicle* was a crucial part of my five-year plan. Luckily, my
160 connections with the Crow & Eye helped me land an equally good spot on the Student Council,
161 but there's been some bad blood between Dakota and me ever since. Dakota would often
162 assign me to do lifestyle articles and restaurant reviews. Fluff pieces. It was humiliating and
163 infuriating. I had to fight for every real story published under my name.

164 Things just got worse and worse after Lee Reddy IV died. Dakota became obsessed with
165 exposing the one "really" responsible for Lee's death. Sure, Dakota went after the Crow & Eye
166 — probably jealous that they never got tapped to join — but Dakota really had their sights set
167 on President Rice. In meetings for *The Chronicle*, Dakota kept saying that we had to make
168 President Rice pay for killing Lee. I told Dakota that was stupid and that President Rice had
169 nothing to do with it. Dakota just told me to shut up and keep quiet like a good little Crow.

170 For a while, I assumed Dakota was just grieving and it would all blow over, but then I
171 overheard two really disturbing conversations. The first was probably around mid- to late
172 February. I was in *The Chronicle* office, working on an article, and got up to use the bathroom.

173 As I was passing by the Editor-in-Chief's office, I could hear Dakota and Professor Marlow
174 talking. The door must have been open. I stopped so that I was hidden around the corner from
175 view and put my hand around my ear to listen.

176 Dakota said, "We have to break this story soon. If the school year ends before the truth
177 is out, then everyone will just forget about it and the president will get away with murder!"
178 Although the school year runs until the end of April, *The Chronicle* only runs stories through
179 March so that the student journalists can use April to focus on exams. So, I understood Dakota
180 to mean that a story needed to be run by no later than March.

181 I heard Professor Marlow sigh and then reply, "Look, unless you can get someone within
182 the group to speak to you, this is probably a dead end." Dakota said, "An inside source from a
183 secret society? I'd be better off being my own inside source." I'm not sure exactly what I heard
184 next; it sounded kind of like a chair being pushed back quickly. Then I heard Professor Marlow
185 say, "Careful. Not with the door open," followed by the door slamming shut.

186 The second conversation was one I had directly with Dakota a couple of weeks after
187 that. I can't remember the exact date. Dakota had been publishing opinion pieces that very
188 much toed the line and stopped just short of saying that President Rice was directly responsible
189 for Lee's death. Dakota was in their office and I saw them jump up excitedly from their
190 computer and go over to their whiteboard where there were a bunch of ideas all scribbled
191 down. Dakota picked up a marker and wrote "President's Office," circled it, drew an arrow
192 downward, and then wrote "Out of town = LIES," and underlined it. Then Dakota exclaimed,
193 "I've got you now!"

194 My curiosity got the better of me, and I came to stand in the doorway and asked what
195 that was all about. Dakota whipped around and looked very smug. Dakota told me that an
196 inside source had come forward who could confirm that the president's story about being out
197 of town on the night of the initiation ceremony was false. And this informant also had
198 information proving that President Rice was actually present at the ritual when Lee was killed.

199 Honestly, I was stunned. I told Dakota that was the stupidest thing I'd ever heard. I told
200 Dakota that President Rice definitely wasn't there the night of October 13, 2023, because I saw
201 President Rice take a taxi to the airport. I told Dakota that whoever this inside source was, they

202 were playing a trick on Dakota and Dakota needed to get their facts straight before they did
203 something stupid.

204 Dakota just brushed me off, saying that of course I would cover for my fellow Crow. I
205 tried to tell Dakota that this inside source couldn't be trusted, but Dakota wouldn't listen.
206 Dakota told me to get lost, so I left. I sent Dakota a text a few days later again trying to get
207 them to reconsider and they blew me off again. Exhibit 7 are my texts with Dakota. About a
208 week later, Dakota published the article that started this whole mess and the reason why
209 President Rice got fired. I couldn't believe it when I read it. I thought about going to Professor
210 Marlow and revealing that I knew the article's assertions were false because I knew the
211 President had gone to the airport but decided not to. Because Marlow and Dakota are thick as
212 thieves, I figured Marlow wouldn't care about the truth either.

213 Honestly, I think Dakota is getting what they deserve. Dakota didn't care about
214 journalism ethics and certainly didn't care about the truth. All Dakota cared about was this
215 personal vendetta against President Rice and holding someone accountable for Lee Reddy's
216 death. Meanwhile, poor President Rice got fired over that false story. It isn't right, and it isn't
217 fair.

STATEMENT OF DAKOTA SARAVANA

Hey there, my name is Dakota Saravana. I've wanted to be a journalist for as long as I can remember. Growing up, I used to interview my friends and neighbors about the goings on in their lives and then write up little articles. As a teenager, I interned for the local paper and learned everything I could about the profession. You'd be amazed what kind of things have happened even in a town like Morgan, Virginia.

One day, I would love to get out of Morgan and get to Washington, D.C., where there is some real dirt to dig up. Maybe I could even break a story so big that my name ends up in history books like Ida Tarbell or Upton Sinclair. Ida Tarbell almost singlehandedly brought down the biggest monopoly the United States has ever seen, and Upton Sinclair changed how we handle food forever. Reporters like them are my idols and who I want to be. Before that, though, I know I have to learn the ropes and spend some time in the trenches. That is why, when I got to Skyview University, there was no question that I would try out for *The Chronicle* and work my way up to Editor-in-Chief ("EIC").

I started off as a cub reporter (lowest level) my freshman year and worked hard. I immediately clicked with the faculty advisor, Professor Justice Marlow. Professor Marlow was tough but fair. Professor Marlow taught us the practical skills of journalism: how to interview sources, how to order the articles in the paper, and how to work with photographers to get photos that would draw the readers in. Professor Marlow taught me how even a simple sidewalk closure could turn into a story about how the university was spending its resources and an opportunity to question those in power about whether they were being fiscally responsible. I've learned so much from Professor Marlow during my time on *The Chronicle*.

At the end of my freshman year, I mustered up the courage to run for EIC, and I ran against my long-time rival, Presley Kurthi. I just had to beat Presley, so I put everything into it. I worked long hours, fine-tuned every piece I wrote for the paper until it was perfect, and kept pushing myself to get better. There was no way I was letting a Crow & Eye member like Presley get the job. Presley is a good writer and researcher, but man is Presley a complainer! No matter what article I assign to Presley, Presley has something to say about it. Presley is never in the

office, so they never know what anyone else is working on, and Presley always turns in articles late. It gives me a heart attack. I think Presley does it on purpose just to get back at me for winning EIC. I think Presley will always be bitter about me winning, but come on! I deserved it. I worked for it, and I got it. Presley can be bitter all they want.

It was fortunate that the EIC position is selected by the faculty advisor based on merit and not an election like Student Council. It's no secret that the Crow & Eye Society uses its influence to handpick who wins Student Council elections and also has its talons in every aspect of Greek life. I love Skyview University, but I can't stand how the university has just let the Crow & Eye do whatever it wants from the shadows. Secret societies like that shouldn't exist. They're inherently elitist clubs for the rich and popular, and they take away opportunities from hardworking people. They place loyalty over actual ability. That's no way to run a society. I've earned everything I ever got. I always worked my way up. I can't stand people who get there just by being a member of some social group.

Presley was a Crow, of course. President Rice was too and was almost as bad as Presley. President Rice liked to meddle in the Journalism Department because they had a PhD in it. But Rice had never actually done the work. In reality, I had more experience than President Rice at doing actual journalism, and I am still a student!

One of the things that President Rice did that annoyed me was require everyone who worked on *The Chronicle* to take an ethics in journalism course. I wasn't annoyed because of the subject matter. I was annoyed because it made it harder to recruit people to work on the paper. Who wants to take an ethics course? People don't protest about learning on the job. They do protest about sitting through stuffy lectures and taking exams.

It always felt like President Rice was trying to put brakes on the news. The funny thing is, it turned out that President Rice was a hypocrite because those stupid courses President Rice made us take on ethics taught us about journalistic integrity, which is all about sticking to the truth, but when we wrote the truth about President Rice, all of a sudden, the truth was bad. At the end of the day, all that President Rice really cared about was protecting their precious Crows and protecting their career. President Rice didn't want anyone asking hard questions or demanding the truth. Luckily, President Rice didn't get a say in what we published at *The*

57 *Chronicle*, though, because Skyview is a public university and *The Chronicle* is funded separately
58 from the rest of the university. President Rice could try to slow us down, but they couldn't shut
59 us down.

60 The way I see it, news travels fast, and the stories need to be told. It shouldn't matter if
61 a story will hurt someone's feelings if it's a story that people need to hear. The people need to
62 know what happened while it's still happening, or soon after. Otherwise, it loses all its teeth; it
63 becomes stale — old news. Obviously, we're not going to lie, but we also don't always have
64 time to check every piece of information three times. Sometimes, a journalist has to follow
65 their gut. Stories can develop over time.

66 Anyway, my tenure as EIC of *The Chronicle* has been a success. Before I became EIC, the
67 paper was struggling to keep readers. Most people get their news online today on Reddit or
68 TikTok, if they read the news at all. We had to find a way to combat that, so I turned to binge-
69 worthy shows for inspiration. What would make me click "next episode" faster than anything?
70 A cliffhanger, care for the characters, and never knowing what was going to happen next. I
71 applied those principles to journalism by changing up the style of our articles. I made them
72 shorter and split them up over two or three issues. I edited them to read more like stories than
73 like news, so readers would get sucked in and want to know what happened next.

74 The best part is, it worked! Readership went up, and papers flew off the tables at the
75 student union as soon as we put them out. Even people around town were reading our paper. A
76 couple of times, people were even waiting by our drop off spots for the next issue. Some
77 people, like Presley, didn't like the direction I took the paper in, saying it was becoming a
78 tabloid, but what good is the news if it isn't relevant to the people reading it? The proof is in
79 the pudding: we were bringing in revenue for the first time in decades. Local businesses started
80 calling to put ads in our paper. In a dying media, we were on the rise, and I took that as a win.

81 I did get into a bit of hot water, though, at the start of my tenure as EIC. I was feeling a
82 bit overwhelmed by all the responsibility and workload on top of all my classes. For one of my
83 English classes, I made the mistake of having AI write the first draft of the paper for me. I went
84 back and made edits, of course, but I guess I didn't change it enough and the paper got flagged
85 as AI. I was charged with an Honor Code violation by the university and had to go to a hearing

86 before the Honor Council and everything. They found me guilty and put me on probation, and I
87 had to repeat the course. But luckily, I wasn't kicked out of school. Anyway, I learned a lesson
88 about taking shortcuts and haven't had any incidents since then.

89 Other than that, life on campus was pretty normal until Lee Reddy IV died on October
90 13, 2023. Word spread across campus like wildfire. I didn't personally know him, but I knew of
91 him. He was a rising star athlete and member of a prominent Morgan family. I heard from
92 multiple people on campus that Lee was killed while being hazed by the Crow & Eye. They
93 made him climb a tree on campus, and he fell and broke his neck.

94 I was shocked and appalled. And then, I was outraged when the school did absolutely
95 nothing. A student had died, and we all knew what organization was responsible, and yet
96 nothing changed. It made me sick to think that the Crow & Eye was just going to keep operating
97 as usual, and the rest of the school was just expected to accept that.

98 I wanted to bring them down, and I had just the tool to do it: journalism. If Ida Tarbell
99 could bring down Standard Oil, then I could bring down one secret society. I knew that if I could
100 figure out who turned the wheels on the machine that was the Crow & Eye, then I could bring it
101 down once and for all. Then, people would get positions based on their merit rather than their
102 lineage. No more people would be at risk of dying from their ridiculous hazing ritual. Something
103 happened on October 13, 2023. Someone was responsible for Lee's death. I was going to find
104 out who, expose them, and bring down the Crow & Eye once and for all.

105 Of course, Skyview and the Morgan Police Department launched investigations into
106 Lee's death, but I couldn't trust those investigations. Skyview didn't order an investigation until
107 after I had made a stink, and it had a vested interest in keeping its investigation as quiet as
108 possible. I knew that the university would never be forthcoming with details. The Morgan Police
109 Department was crawling with former Crow & Eye members, so they too would want to keep
110 things under wraps. I was the only one with the journalistic experience and the drive to really
111 get to the bottom of this story — for Lee, and for all the current and future students of Skyview.
112 This was going to be my big break, my Ida Tarbell moment.

113 Look, I'll admit that I was suspicious of President Rice from the beginning. The Crow &
114 Eye rule the school from the shadows, put students in danger every single year, never get

115 caught or punished, and a Crow just happens to sit at the top of the roost? That's more than a
116 coincidence. But when I tried to investigate, I kept hitting a brick wall. The Crows are
117 notoriously tight-beaked about their organization. I asked around and got names of students
118 who were in the Crow & Eye, but whenever I tried to talk to those people, they would go silent.
119 No one would talk about what had happened to Lee or anything about the secret society.

120 At first, all I could do was publish some opinion pieces in the paper asking
121 questions. Exhibit 2 includes those opinion pieces. I tried to encourage readers to think
122 critically, and I hoped I could put pressure on the university to do something. I guess it worked
123 — but not in the way I had hoped. The university hired some private investigator to “look into”
124 Lee's death. Then, two months after Lee was killed and right before everyone left for winter
125 break, the university released a statement saying the investigator had found that no one from
126 the school administration was involved in the hazing ritual, including President Rice. They said it
127 was all just a tragic hazing incident from a rogue organization. When *The Chronicle* asked for
128 more information, all we got was a brief memo from Shawn Sonti. Exhibit 4 is an accurate copy
129 of the memo that the university produced to *The Chronicle* in response to our request for
130 information. It was a joke. Shawn Sonti didn't talk to a single Crow & Eye member other than
131 the president and just believed everything Rice said! Needless to say, I still had questions, and
132 the public demanded answers.

133 I was getting increasingly frustrated and was afraid that the school year would come to
134 an end before I had discovered the truth. I knew that if I didn't break the story before summer
135 break, then everyone would lose interest over the summer and it would be even more
136 impossible to find the truth. That all changed on March 7, 2024. That day, when I checked my
137 email, there was a message titled “Scoop on the Crow & Eye death.” Obviously, I opened it, and
138 when I read it I was shocked. The sender claimed to work in the Office of the President and to
139 have proof that the president was involved in the hazing incident that killed Lee. I also noticed
140 that the email appeared to be specifically created so that the source could remain anonymous.

141 The email was a bit light on details, but after months of banging my head against the
142 wall of silence the Crows had put up, I was desperate for any information. I immediately wrote
143 back and asked for more information.

144 Here's where things got interesting. The source replied back and stated that they were
145 actually at the hazing ritual the night that Lee was killed and saw the president there! They also
146 sent me a photo showing the light on in the President's Office that they claimed was taken on
147 October 13, 2023, and an email showing that Rice was invited to speak at a Crow & Eye event
148 before the initiation. The source also screwed up and sent the second email from what
149 appeared to be their real email. The email address was from a university email account. From
150 that email address, I was able to deduce that the source was a student of Skyview University,
151 Kendall Rose. Based on that, I knew the source was lying about working in the President's
152 Office, but I figured they were just trying to cover their tracks and seem more credible.

153 I replied back and asked whether the source was willing to sit down for an interview.
154 The reply I got back stated that they wanted to remain anonymous because they were afraid of
155 retribution from the Crow & Eye. It was a disappointing response but not surprising. Exhibit 9 is
156 a fair and accurate copy of the email chain between me and the source and Exhibits 10 and 11
157 are fair and accurate copies of the attachments the source sent me.

158 Still, it was something, which was more than the nothing I had before. I didn't know
159 Kendall Rose personally, but I asked around and managed to find out that Kendall was a
160 member of the Crow & Eye. From what I learned, Kendall didn't get along with some of the
161 other members of the society, which is probably why they were willing to share inside
162 information. This was huge. I had never dreamed that a member of the secret society would be
163 my inside source.

164 I knew that I needed some kind of corroboration though. The source had already
165 provided the picture of the light in the president's office and the invitation to President Rice for
166 the initiation. But I also had a copy of the police report from the October 13, 2023, incident
167 (Exhibit 13) that I had gotten through a Freedom of Information Act request earlier on in my
168 investigation. One of the things that had always stood out to me was that in the police report,
169 there was mention that a witness had stated that school administration members had been
170 present at the initiation ritual.

171 I knew that President Rice claimed that they were out of town on October 13, 2023, and
172 that the Sonti Investigation had concluded that President Rice was out of town, but I never saw

173 any evidence that supported those claims. I called the Office of the President and left a
174 message asking for comment, but I never got a response back.

175 With the Crow & Eye being so secretive and silent, I figured that was as good as it was
176 going to get. I still had some questions in my mind, but you can never be 100% sure of anything.
177 I guess I could have kept investigating to tie down more loose ends, but time was ticking, and
178 we had to run the story before it was too late. I published my story on March 13, 2024, and the
179 university went absolutely wild. Exhibit 1 is a fair and accurate copy of the article I wrote and
180 published in *The Chronicle* on March 13, 2024.

181 I never showed Professor Marlow my article before it was published, but that was
182 because I ran out of time, and Professor Marlow wasn't available right before publishing. But as
183 EIC, and per *The Chronicle's* guidelines, I felt like I had the final say over what got published
184 anyway.

185 My story was like poking a hornet's nest with a stick. It got picked up by the local
186 newspaper in Morgan and then in newspapers across the state. Eventually, it even made
187 national news! It really was my Ida Tarbell moment, and I was excited to see that the truth was
188 finally getting out there.

189 Then, President Rice got sacked, and things went downhill quickly. President Rice
190 wasted no time suing me and *The Chronicle* and claiming defamation. President Rice claimed I
191 knew certain statements in the article were false when they were published, but that's not
192 true. And President Rice even got their Crow stooge, Presley, to lie and say that Presley told me
193 the story wasn't true. But Presley never provided any contradictory information to me related
194 to the story. Sure, Presley sent me a text telling me to back off President Rice, but what do you
195 expect from a Crow? I believed every word of what I published back then, and I did everything I
196 could to corroborate the facts before publishing that story.

197 Journalists have to be free to print the news, even if it makes the rich, powerful, and
198 well-connected mad. People like President Rice cannot be above the law, and maintaining a
199 free press is one of the many ways we ensure against corruption like the Crow & Eye. If I go
200 down today, who will they attack next? We cannot let ourselves be intimidated by these Crows.
201 Someone has to stand up to them.

STATEMENT OF JUSTICE MARLOW

1 I am Pulitzer Prize-winning journalist Justice Marlow. In high school, I had a pretty
2 successful side business selling newspapers. I love newspapers: local and national news
3 gathered together in one place in black and white. I really admired journalists and read every
4 issue of every newspaper that I ever sold — and that was a lot! Pretty shortly after high school,
5 I decided that reading wasn't enough. I began talking to locals and my friends and gathering
6 news to write about. At first, it was pretty boring stuff, but eventually I learned enough to ask
7 the right questions and find the interesting part of any seemingly boring story. I wrote at least
8 one article every single night.

9 Then, when I felt I was good enough, I started submitting my articles to newspapers
10 around town. Did you know you could do that? Just submit stories you wrote yourself? Exactly;
11 college kids and graduates never know that. My articles received rejection after rejection... until
12 suddenly it became acceptance after acceptance, and then I got job offers! It took me years,
13 but before I knew it, I was an established journalist writing for major newspapers! While I have
14 always had my boots on the ground investigating and writing stories, I also put myself through
15 school and earned my undergraduate degree in journalism.

16 In 2015, I started a podcast about a personal passion project: a local murder that
17 occurred when I first started gathering news. This homeless woman I'd spoken to a few times
18 while covering various stories was convicted of the murder, but it never sat right with me. I had
19 talked to this woman so many times, and the person I knew just didn't match with what the
20 police were saying. I titled the podcast "One Hit, I Wonder." The first half focused on how and
21 why the police charged Eve Harrington with murder. I had a few contemporaneous notes from
22 around the time of the murder, including a couple with Eve, and it gave me a unique starting
23 place. Shockingly, I was able to get to the heart of the matter that the police were never able to
24 and uncovered evidence of a drug ring that ordered the hit. That's what Part Two focused on:
25 tracking all the leads the police didn't bother to investigate or didn't know about. I discovered
26 that the victim, a local businessman, was deeply involved in a local street gang and he was
27 murdered so that the gang could steal from him. The podcast was a smash hit, and the story got

picked up by every major and minor news outlet. My investigative journalism resulted in Eve's conviction being overturned and an innocent woman being set free.

I ended up receiving some degree of national acclaim, and even the journalism community recognized my efforts. I was awarded the Pulitzer Prize in Investigative Reporting in 2016. To my surprise, I also got several offers to give lectures or join the faculty from different universities across the country. Teaching wasn't something I'd thought about before, but I did feel inspired to give back. I ended up accepting an offer from Skyview University and teaching part time in 2017. I immediately fell in love with being a professor and became a full-time faculty member in 2018 and was quickly appointed faculty advisor to the student newspaper, *The Chronicle*. Offering students insight into real-world journalism is why I teach. Before I came, the students only knew how to function as academic journalists — no clue how the real world worked! And *The Chronicle* was a mess of stodgy, academic writing. The writing itself was top shelf, great grammar, but no actual newspaper would publish anything they wrote.

My tenure as a full time professor unfortunately coincided with President Rice's return to Skyview University. I had heard that President Rice was the former chair of the Journalism Department who left to go be a dean somewhere else and then returned to be president at Skyview. At first, I thought having a president that was a fellow journalist would be great, but I was wrong.

President Rice is no journalist. President Rice's idea of journalism is a research paper on the ethical considerations of an Oxford comma. But I guess that's what you get with a doctorate in journalism and no practical experience. President Rice was an academic with no real-world experience in journalism but had the nerve to tell me — a prize-winning investigative journalist — how to do my job! I'm doing my best to ensure none of my students turn out that way, but President Rice made it tough. President Rice was clearly jealous of me and my career and did their level best to force me out. At the end of 2022, Rice put in place this insane policy that all professors had to write academic articles — like my work doesn't already speak for itself! Who exactly could be more qualified to teach journalism than a Pulitzer Prize-winning journalist? But Rice somehow got the Board to agree, and I was going to be forced to write some stuffy piece. Luckily, Rice got fired before I actually had to eat crow and sell out like that.

57 Rice also ordered that all students on *The Chronicle* had to take journalism ethics
58 classes... what a waste of their time. Ethics should be taught as part of the journalism courses
59 and not as a separate class. I've heard most of the students on *The Chronicle* complain about it.
60 Saravana especially hated the new requirement because it made it harder to recruit new
61 people to the paper.

62 At Skyview University, *The Chronicle* is an independent organization on campus that isn't
63 funded by the university and has full editorial control over what it publishes. That is one of the
64 reasons I chose Skyview University. Of course, that also means that *The Chronicle* has to
65 consider its funding situation because we don't receive money from the school itself. *The*
66 *Chronicle* really is a stand-alone organization just like a regular newspaper. And I make sure all
67 the students on staff know that. It's also nice because I'm not like "in charge" of the students;
68 I'm really just an advisor. I teach and give advice and edit, but I don't have to do their jobs for
69 them.

70 It's obviously never come up, and I don't see why it would, but the kids could even
71 publish the paper without my approval if they wanted to. That's how much freedom they have.
72 The paper only runs during the school year since that's the only time they have a readership.
73 It's pretty convenient for me, because it allows me to focus on my podcast and journalism
74 career outside of Skyview. The paper runs from September at the start of school through
75 March. We take breaks for holidays and also the months of December and April before the
76 semesters end so that everyone can focus on exams. That might be the one change that Rice
77 made that I actually approve.

78 Back in the day, I investigated and reported on secret societies. The subject never made
79 it onto my podcast because I started the podcast after those investigations. But let me tell you,
80 those societies are no laughing matter. In 2012, there were 10 hazing-related deaths! Ten!
81 That's how many people get attacked by sharks per year. The History Channel devoted an
82 entire week to playing TV programs about sharks, and yet we're fine with letting sharks of a
83 different kind attack our college students every year.

84 And then Lee Reddy IV died because of some stupid ritual forced on him by the Crow &
85 Eye. I knew there was a secret society on campus, and I really didn't like it. I talked to all my

86 students about it and warned them about how dangerous secret societies can be. I didn't know
87 much about the Crow & Eye specifically, but I made it clear I didn't approve. Rice tried to talk to
88 me about it — something about how they're basically just a social club and I shouldn't be so
89 prejudiced. But secret societies are dangerous, and my journalistic instincts warned me that the
90 Crow & Eye would prove no exception. And it turns out I was 100% right, but I really wish I
91 wasn't.

92 You know, when I was first named faculty advisor for *The Chronicle*, they actually had
93 the gall to contact me. Or at least some anonymous person claiming to be with the Crow & Eye
94 contacted me wanting me to play puppet and appoint their person to be Editor-in-Chief!
95 They're lucky they didn't give me a name, or I would have kicked them off the newspaper
96 entirely! Anyone on any newspaper that I'm part of got that job by merit. Anyway, they knew
97 better than to ever bother me with that again. In 2023, I ended up choosing Dakota Saravana as
98 Editor-in-Chief. The kid has great instincts and will be a great journalist. Saravana already
99 understands the difference between journalism and academia. Saravana also makes a great
100 leader and doesn't let personal opinions interfere with their job.

101 I've heard the rumors criticizing *The Chronicle* for being more like a tabloid magazine
102 than a newspaper these days. It really annoyed Saravana, but I do see their point. Now, part of
103 it is just that I've advised the kids to focus on finding stories that other college students will
104 want to read. Before me, the paper only published articles about how great the new fountain
105 on campus was or how a French teacher just had a baby. Engagement is an essential part of
106 journalism, and contrary to what people like President Rice think, knowing how to get eyes on
107 papers is a basic necessity, especially because we're funded by advertising. But I have to admit,
108 the kids might have overcorrected a bit into sensationalism and they're not always as accurate
109 as they could be, so I have to edit articles more than I would like sometimes. They're just young
110 and inexperienced and so enthusiastic! Readership is way up, obviously, but there's still some
111 growing pains as they learn to find that balance.

112 I was surprised when Saravana first came to me with the idea for an article investigating
113 whether Rice had anything to do with that horrible hazing death on October 13, 2023. During
114 the course of that initial conversation, I learned that Saravana hated the Crow & Eye for how

115 much power it was able to wield on campus and for making a student go through hazing that
116 resulted in a death. Saravana showed me credible sources proving that President Rice was a
117 member of the Crow & Eye, which was a shock to me. Then Saravana started saying that only a
118 fool would believe that the number one Crow at the top of the university wouldn't somehow be
119 involved in Reddy's death.

120 On the one hand, I firmly believe it is a journalist's duty to question authority and
121 expose corruption. Freedom of speech, particularly freedom of the press, is a touchstone of
122 American liberty. But on the other hand, I could tell Saravana was riled up about the incident. I
123 told Saravana that they should investigate and ask questions but that they shouldn't publish
124 anything unless they had hard evidence. I checked in periodically with Saravana on how the
125 investigation was going, but Saravana told me that they were hitting a brick wall because no
126 member of the secret society was willing to talk.

127 Although the investigation wasn't going well, Saravana published a few op-ed pieces
128 that put pressure on the university. Those op-ed articles were more general, just demanding
129 answers and justice and trying to get people to think critically. Saravana's articles did call out
130 the Crow & Eye Society directly though. Honestly, I applaud Saravana for their bravery in
131 demanding accountability and encouraging people to ask questions. I had warned Saravana that
132 secret societies don't like being in the spotlight or being criticized. These were the kinds of
133 articles that could lose friends and make life a lot harder. For example, if any faculty were
134 members of the secret society, then publishing negative stories could affect Saravana's grades.
135 And members of the Crow & Eye and their friends might start bullying Saravana. But Saravana
136 was determined.

137 Saravana's last article on Reddy's death shaped up to be a doozy. The article talked
138 about how the Crow & Eye killed Reddy and accused Rice of knowing that the hazing would
139 happen and even being there when it happened. I didn't see the article before it was published,
140 but I spoke with Saravana many times about what would be required to publish the article
141 Saravana wanted to write.

142 After the article was published, things moved fast. President Rice was fired and turned
143 around and sued Saravana and *The Chronicle* for libel. The defense team then reached out to

me to get my opinion on whether Saravana violated the standards of journalism. They then asked whether I would serve as an expert witness in this case. After careful consideration, I decided I was the perfect person to be an expert in this case to support my student, and students everywhere, in defending their free speech.

To prepare to testify in this case, I reviewed all of the exhibits available in this case and the affidavits of all other witnesses. Applying my expertise in journalism and the knowledge of the norms in my field, I reached my conclusions about whether Saravana violated any standard practices and whether Saravana acted with actual malice in publishing the March 13, 2024, news article. My conclusion, to a reasonable degree of certainty in the field of journalism, is that Saravana met the standards for a journalism investigation and did not act with actual malice.

Actual malice is a well-known standard within the field of journalism and is the standard applied to news articles written about public figures. Criticism and questioning authority are core American values. We must be careful about silencing people who are trying to speak out against those in power simply because we don't like what they have to say. Therefore, the actual malice standard requires that when someone publishes an asserted fact about a public figure that turns out to be untrue, that the person either (1) knew the fact was false at the time of publication or (2) recklessly disregarded the truth. Although there are no rules of ethics that legally bind the conduct of journalists, most journalists adhere to the Code of Ethics published by the Society of Professional Journalists. Exhibit 8 is a fair and accurate copy of that Code of Ethics. Exhibit 8 is a reliable authority in the field of journalism, and I relied on it in forming my opinions for this case.

In this case, most of the ethical considerations center around Saravana's reliance on an anonymous source. Sources are everything in journalism. You should never publish anything that cannot be backed up by at least one source. However, I always teach my students that it isn't good practice to rely on only one source. Ideally, you should back that first source up with a second source, whether that be a witness or documentation. I always joke to my students, "If your mother says she loves you, get a second source."

As a general rule in Journalism, your audience should be entitled to weigh the possible

biases and credibility of your sources. However, there are circumstances in which you have to keep a source anonymous. In particular, anonymity is appropriate when you have a legitimate concern that the source could face retribution or danger if their identity is known. Anonymity is especially important if the source is concerned and asks to remain anonymous, because the bond of trust between a journalist and their source is sacrosanct. In this case, Saravana was well within the standards of journalism to conclude that anonymity was appropriate because of the danger the source might face from the Crow & Eye Society. If there is one thing a journalist should never do, it's burn a source. Burning a source refers to when a journalist makes a source known against their wishes and exposes them to potential blowback. Saravana acted ethically by refusing to burn their source, who was in potential danger for speaking out against the secret society. Additionally, Saravana appropriately explained within the March 13, 2024, article why the source would remain anonymous.

The only way in which using the anonymous source would have been a problem is if Saravana didn't know who the source was. Saravana needed to be able to determine whether the source was someone who would have actual information about the Crow & Eye. However, as Saravana explained in their affidavit, Saravana had actually discovered the identity of the anonymous source during the investigation and learned that the source was a member of the Crow & Eye and therefore was a theoretically reliable source of information. Ideally, Saravana would have been able to back up their story with a second inside source, but it would never happen in a case like this. Secret societies are insular and tight-lipped — it's basically impossible to uncover two people willing to break ranks. So instead, the anonymous source is considered point one, and then Saravana needed to investigate whether the evidence backs up their story, thus creating point two, or refutes it, undermining point one.

Once a journalist has received information from a source, they have to investigate and see whether they can corroborate or contradict that information. Here, Saravana made multiple attempts to corroborate the information supplied by Kendall Rose, the anonymous source. First, Saravana discovered Rose's identity and found out that Rose was a member of the Crow & Eye. It is somewhat concerning that Rose lied about their identity and claimed to work in the President's Office, but that wouldn't disqualify them as a potentially credible source.

Second, Saravana knew that President Rice was a member of the Crow & Eye. Third, Saravana reviewed the documents sent by Rose that indicated that President Rice was seemingly invited to attend the initiation ritual on October 13, 2023. Finally, Saravana corroborated Rose's assertion that President Rice was on campus during the initiation ritual by obtaining the police report and comparing it with Rose's statement to Saravana. In particular, Saravana discovered that an eyewitness at the ritual had told police that members of the school administration had been present at the ceremony. This was enough to corroborate Rose's statement to Saravana that the president, a member of the school administration, was present. When taken altogether, it can paint the picture that Saravana believed it did, especially when Saravana did not uncover any new contrary evidence or have any refutations from President Rice.

Additionally, Saravana was under a deadline to publish the story. Because *The Chronicle* ends publication for the school year in March, Saravana knew that the story had to be published in March or else it would have waited until after summer break. Given the deadline Saravana was working under, spending a week investigating the information from Rose was appropriate. Yes, in a perfect world, Saravana would have done more investigating and should have reached out to President Rice for a comment, but we don't live in a perfect world, and Saravana did the best they could with the information and time they had.

The only potentially contrary evidence that Saravana had before them was the investigation done by the private investigator, Shawn Sonti, and the story that Presley Kurthi brought up in their affidavit. In December 2023, Sonti presented a report to the Board of Visitors clearing President Rice of any wrongdoing. The report stated that the evidence supported President Rice's claim of being out of town on a business trip on the night of October 13, 2023. However, the specific documents that Sonti relied upon merely show that a trip was planned. Nothing conclusively established that President Rice ever boarded a flight or actually left town. We also don't know whether there was a flight delay allowing President Rice to both attend the ceremony and then fly out for the rest of the weekend. Saravana was presented with competing information about President Rice's whereabouts on October 13, 2023. Ultimately, Saravana used their judgment and reasonably concluded that the anonymous source was more trustworthy.

231 Kurthi claims that they told Saravana that the information provided by the anonymous
232 source was false. Saravana maintains that this conversation never happened. I have reviewed
233 Kurthi's affidavit in preparation for trial. I cannot recall whether I ever had the conversation
234 with Saravana that Kurthi described, but it seems like a conversation that could have happened.
235 I often talk with my students about how to conduct investigations and what they need to
236 publish accurate stories. I can say that I certainly did not see or overhear any conversation
237 between Kurthi and Saravana like what was described in Kurthi's affidavit. After weighing the
238 evidence, my recollections, and what I know about each of these individuals, I believe that
239 Saravana is telling the truth. If Saravana is telling the truth, then Saravana did not have
240 information that the statements by the anonymous source were false. Admittedly, however, if
241 Saravana is not telling the truth, then Saravana would have acted recklessly by disregarding the
242 contradictory information supplied by Kurthi.

243 It is my conclusion that Saravana acted ethically and within the standards of journalism
244 in not only protecting the anonymous source during publication but in corroborating the
245 information provided by the anonymous source and considering potential contrary evidence.

246 I know people will probably criticize the fact that Saravana did not show me the article
247 or get my approval for publishing it, but it wasn't anything that concerned me. We only publish
248 weekly, and the end of the publishing year was coming up fast, so I understood why Saravana
249 was in a rush to publish the story. I'm usually available the night before the paper is published
250 until 6 pm and then the finalized paper gets sent to the printers by 8 pm. I don't stick around
251 for the last finalization bits — instead, I just read over everything and give any final edits. The
252 article placement, et cetera, is left to the students. Of course, I was going to be out for a
253 medical thing the day before that article got published, so I had preapproved everything two
254 days before. Saravana's article wasn't one of the ones I approved or knew was running for that
255 edition. That's not technically "Chronicle Procedure," but it's also not uncommon to see in
256 actual newsrooms, which is how I want everyone to view *The Chronicle*. To be clear, the
257 procedures aren't the standard within the field of journalism — they only serve as a guideline
258 for how *The Chronicle* is supposed to operate. They're more of a gold standard than the actual
259 requirement. Besides, as a paper independent from the school, I actually don't have final say in

260 what gets published — the Editor-in-Chief does. Exhibit 5 is a fair and accurate copy of *The*
261 *Chronicle's* procedures.

262 After the article was published and I got a chance to read it, I wasn't surprised when I
263 was summoned to the Ivory Tower by President Rice. President Rice really lost their cool at that
264 meeting, yelling and threatening me. As a successful journalist and crime podcaster, this is
265 hardly the first time someone has threatened my livelihood. I mean, I've even been held in
266 contempt of court by a federal judge. And honestly, President Rice was overestimating their
267 connections to block me from ever being a journalist again. My podcast is independently done
268 by me and a friend who does the editing, so really the only way to stop me is to get rid of the
269 internet itself. President Rice demanded a retraction that said they had nothing to do with
270 Reddy's death, or it would be my head. I wanted to tell President Rice where they could shove
271 that threat, but I agreed to discuss it with Saravana. It was Saravana's article and Saravana's
272 choice. Saravana, predictably, refused. And I still support that decision. Saravana published
273 what they believed to be the true story based on a credible inside source with reasonable
274 corroboration, and President Rice didn't provide any evidence warranting a retraction.

STATEMENT OF KENDALL ROSE

1 Greetings, I am Kendall Rose and I'm a senior at Skyview University, but once I finish this
2 next semester, I'll be off to greener pastures. I've got a job lined up designing webpages for
3 internet giant Feta. It's not as much as I was hoping to make coming out of school, but,
4 honestly, I can't be done with Skyview soon enough, and I wanted a landing spot as soon as
5 possible.

6 The problem with Skyview is that it's rotten to the core, and the rot begins and ends
7 with the Crow & Eye, the "secret society" that's got its talons into everything. Even President
8 Rice is a member and does whatever it takes to extend the group's influence all over campus.
9 President Rice was a member when they went to Skyview University as a student. And don't let
10 President Rice fool you. Once a Crow, always a Crow, and I'm confident that President Rice was
11 even part of the incident that killed Lee Reddy IV.

12 You're probably wondering how I know all this. It just so happens that I, Kendall Rose,
13 am the confidential informant for *The Chronicle's* articles about the Crow & Eye! Sure, I was one
14 of the lower-level Dwarves rather than among the Gods or Demigods, but I still was able to
15 learn enough about the organization and what was going on to be able to pass along the crucial
16 information to Dakota Saravana.

17 The first thing you need to know about the Crow & Eye is that it has members
18 everywhere around the University and the country, and it has multiple tiers of members. The
19 highest-level members are "Gods," the next level down are the "Demigods," and the rest of us
20 grunts were referred to as "Dwarves." It's a whole lot of Norse mythology lore. We drink
21 "blood" (red fruit punch spiked with alcohol), we seek "danger" (opportunities to show off that
22 we are brave), and try to reach "Valhalla" (the God-tier in the organization). It might sound silly,
23 but we took it deadly seriously. What's more is that if you screw up things for the organization
24 or do anything deemed detrimental to the Crow & Eye, then there can be real retribution.

25 A couple of years ago, before I was even at Skyview, the Skyview Parrots were
26 absolutely killed by our division rival in the homecoming football game. The football coach
27 publicly called out the Crow & Eye for causing the loss. He made a ViewYou video online saying

28 that many of his players were showing up for morning practice exhausted from staying up late
29 and that they wouldn't say what they were up to the nights before practice. I can't say whether
30 those players were in the Crow & Eye, but the Coach blamed the group for their loss that year.
31 Sure enough, in the weeks after the video was posted, there was a spray-painted eye with
32 wings on the Coach's car and anonymous emails to him telling him to quit. The final straw was
33 when his pet snail, Speedy, went missing from his office. He quit before the end of the season.
34 President Rice apparently told people that it was fine since the University didn't want to "shell"
35 out so much money for the coach's salary.

36 When I first got approached about joining the Crow & Eye, I received a letter under my
37 dorm room door. It said I had caught the "Eye of the Crow" from being top of my class in
38 computer science my freshman year. I guess you could say I have a reputation as a bit of a
39 computer genius. The letter said that I could be an asset to the organization. I was thrilled. I
40 honestly never thought someone like me would be offered a spot in a secret society like that.

41 When I followed the clues to the big, tall oak tree next to the University ballfield at
42 midnight, I found four hooded figures. Over the next several nights, I was introduced to other
43 shrouded members and required to complete "tasks" to prove my worth. One involved doing a
44 headstand as long as possible, another time I had to run up and down the football field all night
45 or until I couldn't run anymore, but the final task was the scariest of all. After drinking "blood"
46 punch, I was to climb as high in the oak tree, which they referred to as "Yggdrasill," as I could,
47 find a crow's feather, and "caw" like a crow three times. I am deathly afraid of heights, so I only
48 climbed up to the first group of branches and was lucky enough to find a feather there. I let out
49 three terrified caws while clinging to the branch for dear life. The hooded crowd below all
50 laughed. But the other initiates in my group weren't as afraid as me. I saw them climb really
51 high up into the tree, nearly to the top, and they would stand on the branches that looked
52 about ready to snap and caw loudly into the night. The hooded figures all seemed to enjoy that
53 and egged them on. It seemed like the whole organization, all hooded, was present. Most were
54 students, but there were also clearly full-grown adults there as well. I was too scared to really
55 get a look at anyone's face. I should have known then that the Crow & Eye was not for me.

56 Over the next year, while I was in the Crow & Eye, I was their computer whiz. When we

met in person, we were always hooded, but they actually kept a pretty good record of their past and current members as well as information on where alumni were and contact information for them. I was tasked with organizing their information onto a shared cloud drive online for the “Gods.” What I learned in that role was stunning. The Crow & Eye has alumni members all over the upper echelons of Morgan, Virginia. The mayor of Morgan was a member, and so was the retired chief judge of the circuit court. There were members throughout the police department and even the last elected Commonwealth’s Attorney for Morgan was a member. Most notably, to me, was that President Rice was on that list.

I saved some of the files on my personal computer but not all. I was getting suspicious that they were going to phase me out of the cloud organizing work and have Quentin Shooglesbee take over the job. Shooglesbee had recently been promoted to Demigod and was the star of the computer science school at the time. He ended up getting the job I wanted after graduation, with no small help from the Crow & Eye and a recommendation letter from the President.

On the night of Reddy’s death, I had already been removed from my position assisting with files. I definitely felt like I was being pushed out of the organization. I arrived at Yggdrasill a little before midnight and found that there were dozens of hooded figures. I recognized some faces, and this time I definitely saw some adults present that were clearly too old to be current students. I remember hearing Quentin ask another hooded figure, “Is campus security going to be a problem?” and I clearly heard the hooded person respond, “Don’t worry, we have friends in high places that took care of that.”

I heard someone announce that the “adventure into danger” was about to begin, and I saw Reddy with a painted face by the foot of the tree. Reddy’s face, and all the other initiates, were painted half blue, half white in that Nordic style you see in the movies. I also saw that all the adult-looking hooded figures were standing to one side of the tree, and I wanted to get a good look to see whether I could make out any famous faces, but then Quentin grabbed me by the arm and exclaimed, “We are almost out of blood! Go get more!” It was at that time that I remembered that I was supposed to bring extra punch to the event and I had completely forgotten it. I turned to run back to the dorm, and as I did, I thought I heard a voice that

sounded like President Rice say, “Now our friend Reddy will make the same climb each of you has made — the same climb I made many, many years ago!” It was pretty loud with everyone cheering, and I was about 100 feet away from the front of the crowd. I missed the rest of the initiation before Reddy’s climb.

I jogged away as the crowd of hooded figures chanted, “Climb, climb, climb.” On the way back to the dorm, I noticed that at the top of the admin building, there was a light on in the president’s office. That’s not normal. The president led a campuswide effort to turn off lights when teachers or students had left a room for the day to cut down on energy expenses and to make a more energy-efficient campus. I took a picture so that I could report it to Facilities so they could make sure the light got turned off. I also noticed that the president’s bright blue sports car was in the president’s parking spot. I got back to my room, grabbed the extra bowl of punch from the fridge, and started to hurry quickly, but carefully, back to the tree.

I was most of the way back when I saw that Reddy had climbed to near the top of the tree. He was whooping and hollering, “Valhalla!” and then started crowing. Down below, the hooded figures were going wild with calls of encouragement. That’s when the branch Reddy was holding onto snapped, and I watched as he fell head over heels and I lost sight of him behind the mass of hooded figures.

Someone screamed. There was blood all over the ground because I had dropped the punch bowl, and Reddy didn’t look good either. That’s when almost everyone ran. I definitely saw some of the more adult-looking hooded figures run in the direction of the admin building. I was too shocked to know what to do, so I just stood there in the chaos until police showed up. By then, I overheard one of the officers exclaim, “He’s not breathing!” An ambulance came by, and I and any other people around were questioned by law enforcement about what happened.

Officers asked me a bunch of questions, and I told them everything I knew about the Crow & Eye and what happened that night. I don’t remember whether I said anything about the president because I figured they were most interested in how Reddy went from the ground, up into a tree, and then back on the ground again. But I noticed that the remaining Crow & Eye members who were there noticed how long I was speaking with the officers and then when

115 they were questioned all they said was “lawyer” and “I plead the Fifth,” whatever that means.
116 When I finally headed back to the dorm for the night, I saw that the light in the president’s
117 office was no longer on.

118 After that night, I felt more ostracized than ever by the Crow & Eye Society. I wasn’t
119 notified about meetings anymore, and I no longer had access to any of the files that I had
120 helped organize on the cloud for the group. I saw that President Rice was denying any
121 involvement in Reddy’s death and with the Crow & Eye’s hazing. I was shocked at the hypocrisy.
122 I never liked Rice as a president. I thought they were a bad leader and ignored legitimate
123 complaints about the quality of the food at the dining hall, but publicly condemning the Crow &
124 Eye while also being present that night when Reddy fell was just low. Then I accidentally got
125 included in an email thread with some of the Gods that included a copy of an email sent to
126 President Rice inviting them to the initiation ceremony.

127 About a week after that, I was in the process of interviewing for my dream job after
128 graduating. I was invited to the headquarters of internet search giant Centillion, and guess who
129 else was invited for an interview? Quentin Shooglesbee. Just before I went in for the interview,
130 I overheard the secretary tell the executive that was interviewing me that President Rice had
131 submitted a letter of recommendation for Shooglesbee. Obviously, I didn’t get the post-
132 graduation job and Shooglesbee did. That was the last straw.

133 Between what I knew about the Crow & Eye, what I knew about President Rice, and the
134 documents and emails that I could talk about, I knew that I could hold President Rice
135 accountable. One of my best friends dated the Editor of *The Chronicle*, Dakota Saravana, and I
136 had heard that Saravana hated President Rice so I knew they would want to publish this story.

137 I started out by emailing Saravana with my story saying that I had information that
138 President Rice was involved in Reddy’s death. I admit that I lied and said that I worked in the
139 President’s Office and that’s how I came upon all this information. I figured it would help
140 protect me from more revenge from the Crow & Eye, plus it would sound a bit more credible. I
141 created an anonymous email account: I used anonymouse@email.com and didn’t include my
142 name to remain anonymous. When Saravana responded and asked for more details, I sent
143 them the email I’d received where a member of the Crow & Eye invited President Rice to the

144 initiation ceremony before the tree climb and the picture of the light on in the President's
145 Office and told Saravana what I knew. Usually, I used the anonymouse@email.com, but at least
146 once I accidentally included my school email, Kendall.Rose@Skyview.edu. Either way, looking
147 up my emails' IP address would have revealed where I was sending the info from. Anyone with
148 some computer science background could have done that.

149 Exhibit 9 is a copy of my email correspondence with Saravana, and Exhibits 10 and 11
150 are the attachments I sent to Saravana.

151 I figured some of what I was sending to *The Chronicle* was incomplete information. I
152 mean, I didn't exactly see President Rice's face at the event, and I wouldn't know the
153 president's schedule, but I figured *The Chronicle* would follow up and fact-check my information
154 with interviews from other people around or the person who sent President Rice the invitation
155 or at least get the usual "no comment" from the President's Office.

156 It wasn't until I heard about this lawsuit against Saravana and *The Chronicle* that I felt I
157 had to come forward. The suit is unfair and just a way for Rice and the Crow & Eye to crush any
158 voices willing to stand up to them and call them out for their nefarious ways.

LIST OF EXHIBITS

- Exhibit 1:** March 13, 2024, article published in *The Chronicle*
- Exhibit 2:** Various articles published in *The Chronicle* by Dakota Saravana
- Exhibit 3:** Flight confirmation for Devan Rice for October 13, 2023
- Exhibit 4:** Report from Shawn Sonti dated December 15, 2023
- Exhibit 5:** *The Chronicle* article review and publication procedures
- Exhibit 6:** Photo of tree on Skyview University campus
- Exhibit 7:** SMS activity log for the telephone of Dakota Saravana
- Exhibit 8:** Society of Professional Journalists Code of Ethics
- Exhibit 9:** Emails exchanged between Dakota Saravana and anonymous source
- Exhibit 10:** Crow & Eye invitation to initiation ritual
- Exhibit 11:** Picture of Administration Building taken by Kendall Rose dated October 13, 2023
- Exhibit 12:** Devan Rice reply to Crow & Eye invitation to initiation ritual
- Exhibit 13:** Morgan Police Department Incident Report dated October 14, 2023
- Exhibit 14:** Receipt for taxi dated October 13, 2023
- Exhibit 15:** Curriculum vitae of Shawn Sonti
- Exhibit 16:** Curriculum Vitae of Justice Marlow

EXHIBIT 1

March 13, 2024

“New Evidence Proves President Rice’s Involvement in Reddy’s Death”

By Dakota Saravana

The tragic death of Lee Reddy IV on October 13, 2023, as a result of a Crow & Eye Society hazing has rocked the Skyview community. Reddy was a beloved Skyview student and campus leader. Those directly responsible for the tragedy are currently facing criminal prosecution, and one can only hope that they are held accountable for their crimes despite the power and connections of the Crow & Eye in Morgan.

Until now, however, President Rice has evaded any responsibility for Reddy’s death, despite it being well-known that Rice is a Crow & Eye member. An investigation conducted by the university’s hand-picked investigator, Sonti, unsurprisingly claimed it found no evidence that Rice had any knowledge of or involvement with the hazing that killed Reddy. Despite repeated requests for comment from *The Chronicle*, Rice has declined and referred only to the official statement from the Office of the President.

But new evidence recently obtained by *The Chronicle* from an anonymous source proves that Rice was involved in the Crow & Eye initiation ceremony and had knowledge of the hazing. *The Chronicle* is not publishing the identity of the source to protect them from retribution, but this source has inside knowledge of the cancer afflicting this university. New evidence shows that Rice lied about being out of town on October 13, 2023, and was, in fact, on campus the evening of Reddy’s death. New evidence suggests that President Rice was leading the ritual that ended in Reddy’s death. Rice had knowledge of and was involved in the hazing that caused Reddy’s death and must be held responsible.

Rice’s involvement with and responsibility for Reddy’s death is not surprising. Despite claiming to have ended their involvement in the Crow & Eye, it is well-known that Rice continues to maintain their connections to the secret society and its well-connected members—once a Crow, always a Crow. Additionally, Rice is not the crusader against hazing that they claim to be, having repeatedly turned a blind eye to the conduct of the Crow & Eye. President Rice is a terrible president who has ruined Skyview University and made it unsafe for students by letting the Crow & Eye run amok on campus.

One can only hope that the university reopens its investigation into President Rice and that Rice is held accountable for the killing of Reddy. This community can no longer stand by while a murder of crows tears it apart from within. *The Chronicle* will continue to follow this story and ensure that the truth is revealed.

EXHIBIT 2

October 17, 2023

Op-Ed: Crow & Eye Is a Danger to Us All

By Dakota Saravana

The tragic death of Lee Reddy IV on Friday, October 13, should be a wake-up call to us all that we have a dangerous group of cult members on our campus who are preying on our students. The Crow & Eye isn't some fun secretive little clique of the uber wealthy and connected (although even if that were all it was, it still shouldn't exist). No, the Crow & Eye is a cult that tricks students into joining with promises of wealth, power, and connections and then forces them to engage in dangerous hazing and uses them to maintain its own control over Skyview and Morgan. Hopefully no one else needs to die before we do something about this cancer on our campus.

November 22, 2023

Op-Ed: Crow & Eye Getting Away With Murder

By Dakota Saravana

It has been more than a month since the tragic death of Lee Reddy IV at the hands of the Crow & Eye and still no one has been held accountable. I guess we shouldn't be surprised given that so many powerful people at Skyview and in Morgan are Crows. But still, you would think that no matter how many mayors and college presidents you have as members, there are some things that are beyond the pale and that murder would be one of those things. Rest assured this newspaper will not stop writing about this story until those responsible are held accountable.

January 15, 2024

Op-Ed: Big Surprise, University Report Fails to Hold Anyone Accountable

By Dakota Saravana

Right before the winter break, the university released a summary of the report by the university's handpicked, so called "independent" investigator. Shawn Sonti, "The Mole," is well-known in Virginia for digging up the truth, but, here, Sonti just left a big hole. While Sonti is to be commended for calling out the dangers of secret societies like the Crow & Eye and calling for them to be banned (something this paper has been advocating for years), the failure to identify those truly responsible for Lee Reddy IV's death is inexcusable. Only a fool believes this was a handful of rogue students acting alone. Those responsible are out there, and this reporter will not stop until the truth is uncovered and those responsible are punished.

EXHIBIT 3

costline®

Your receipt from Costline

Your package on Friday, Oct 13, 2023, is confirmed

Costline Trip Number: 318-596-705-13



Neighbourgood Sutter Mansion

Oct 13 – Oct 15 • Check-in: after 10:00 PM

Confirmation #: **5172620562**



MGN – SFO

Oct 13 – Oct 15 • Departure: 6:00 PM

Confirmation #: UA: **M9NS8Q**



Mid-Size SUV

Oct 13 – Oct 15 • Pick-up: after 9:00 PM

Confirmation #: **L25043250B7**

Get help with your trip, discover local experiences, and more!

[Chat with Penny](#)

Payment Summary

Costline trip number

318-596-705-13

Purchase date

Oct 2, 2023

Payment method

Visa (1234)

Billing name

Devan Rice

Cost

\$2,298.47

1 room for 2 nights

1 car for 2 days

Round-trip ticket

Taxes and fees

\$201.97

Number of travelers

1

Trip protection

\$62.30

Total charged

\$2,266.74

Due later

\$296.00

Resort fee

\$40.17

Total cost

\$2,602.91

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EXHIBIT 4

To: Board of Visitors of Skyview University

From: Shawn Sonti, Dig up the Truth Private Investigation

Date: December 15, 2023

Subject: Report of Investigation Into Death of Lee Reddy IV

Dig up the Truth Private Investigations (DTPI) was hired by the Board of Visitors of Skyview University to conduct an independent external investigation regarding whether senior leaders at Skyview University, including President Rice, was aware of or involved in the hazing that led to the death of Lee Reddy IV on October 13, 2023. DTPI was given full access to all documents and employees at Skyview and had the full cooperation of the university. No one influenced or interfered with DTPI's investigation.

Prior to DTPI's investigation, it was already determined by local police that Reddy died during a hazing ritual to join the Crow & Eye Society, a secret society at Skyview University. Reddy died after falling from a tree that he was required to climb as part of initiation into the Crow & Eye. Given the clear and well-established record regarding Reddy's death, DTPI's investigation did not include investigating the cause of Reddy's death. It is also not surprising that Reddy died during a hazing incident for a secret society. Secret societies are dangerous and probably the worst type of college student organization. In DTPI's opinion, all secret societies should be dismantled.

DTPI's focus, however, was on whether senior leaders at Skyview was aware of or involved in the hazing that led to the death of Reddy on October 13, 2023, and whether there were steps that could have been taken to avoid the death.

DTPI reviewed documents from the President's Office and other relevant documents. DTPI also interviewed President Rice, who acknowledged being a member of the Crow & Eye but denied recent activity or involvement with the organization. Based on President Rice's demeanor, statements, and available evidence, DTPI could find no basis to conclude that Rice was lying regarding Rice's recent involvement with the Crow & Eye. DTPI did find some communications between Rice and the Crow & Eye members, but nothing that demonstrated Rice's involvement with the organization or knowledge of the hazing planned for October 13, 2023. However, DTPI was not able to speak with any Crow & Eye members (other than Rice), so DTPI was not able to separately corroborate Rice's level of involvement with the organization.

DTPI also confirmed through documents and testimony that Rice was out of town traveling on the West Coast on October 13, 2023. This further supported Rice's statement that Rice was not involved in or aware of the hazing that led to Reddy's death.

DTPI could find no evidence that any other senior leaders were aware of or involved in the hazing. DTPI also found evidence that Rice and other senior leaders took steps to try to stop dangerous hazing activities, including posting a "Danger" sign by the tree the Crow & Eye used for its hazing and a brick fence. While this sign and fence did not prevent Reddy's death, they demonstrate university leadership's attempts to warn students of the potential danger of engaging in hazing activities and to obstruct access to the tree. DTPI recommends that the university take additional steps including (1) implementing mandatory hazing prevention training for all students and employees, (2) removing the Crow & Eye tree from campus, and (3) taking steps to stop the Crow & Eye from engaging in any hazing activities in the future. Given President Rice's connections to the Crow & Eye and Rice's stated commitment to fighting hazing, it is surprising that some of these steps have not already been taken. DTPI recommends that the Board direct President Rice to take these steps to address and prevent future hazing issues.

EXHIBIT 5

THE CHRONICLE

ARTICLE REVIEW AND PUBLICATION PROCEDURES

The Chronicle is committed to high-quality journalism that seeks and publishes the truth about Skyview University; Morgan, Virginia; the Commonwealth of Virginia; and national and international news. The following procedures are designed to ensure that the stories published in *The Chronicle* meet the high standards of journalism expected of our newspaper.

1. All articles are assigned by an assistant editor or the Editor-in-Chief. If a reporter has an article they would like to write, they can pitch the article to an editor and must get approval before beginning to investigate or write the article.
2. Articles must be thoroughly researched, and it is expected that reporters will have multiple sources of information supporting the factual assertions in an article. Alternative explanations and information contrary to the assertions in the article should be investigated and accounted for.
3. Reporters are encouraged to use creativity and ingenuity in researching articles and identifying sources but also must be mindful of bias or ulterior motives of potential sources.
4. Articles must be reviewed by a second reporter prior to submission to the assistant editor or the Editor-in-Chief for review. The second reporter should review the story and identify any areas for further investigation.
5. Articles involving senior university leadership or high-profile issues and articles that can cause potential liability to *The Chronicle* must be reviewed and approved by the Editor-in-Chief and the Faculty Advisor prior to publication. The ultimate decision for publication of such articles rests with the Editor-in-Chief.

EXHIBIT 6



EXHIBIT 7

MetroLine Communications – SMS Activity Log

Account Holder: Dakota Saravana

Phone Number: (703) 192-8842

Billing Period: February 1–March 15, 2024

Date	Time	Direction	From	To	Message Type	Message
Feb 14, 2024	5:02 PM	Outgoing	(703) 192-8842	(703) 144-7763	SMS	You've missed the last 3 staff meetings. If you miss any more you aren't going to be assigned any new articles to write!
Feb 15, 2024	10:12 PM	Incoming	(703) 144-7763	(703) 192-8842	SMS	Chill out. I have a lot going on and the staff meetings are a waste of time. quit the threats, you know you need me I'm the best reporter you've got
Feb 16, 2024	9:15 AM	Outgoing	(703) 192-8842	(703) 144-7763	SMS	Don't try me, show up at staff meetings or you are benched. We all have other things going on. A student was killed by your Crow pals and I'm working night and day to hold them responsible, but you don't hear me complaining about being busy.
Feb 24, 2024	11:26 AM	Outgoing	(703) 192-8842	(703) 144-7763	SMS	Saw you at the staff meeting, glad you finally realized who's boss here. I'll get you a new

						article assignment, whenever I get around to it... have some real journalism to get to first
Mar 10, 2024	7:32 PM	Incoming	(703) 144-7763	(703) 192-8842	SMS	Hey, I know we don't normally see eye to eye, but I really don't think it is a good idea for you to keep writing stories about Lee's death. You are getting way over your head and it doesn't add up. I'm just looking out for you and the Chronicle.
Mar 10, 2024	9:04 PM	Outgoing	(703) 192-8842	(703) 144-7763	SMS	Get lost Crow, you're just covering for your buddies. I've got them now and they are going to pay for what they did.
Mar 11, 2024	10:00 AM	Incoming	(703) 144-7763	(703) 192-8842	SMS	Don't say I didn't warn you when you get sued or something worse

Society of Professional Journalists

CODE of ETHICS

PREAMBLE

Members of the Society of Professional Journalists believe that public enlightenment is the forerunner of justice and the foundation of democracy. Ethical journalism strives to ensure the free exchange of information that is accurate, fair and thorough. An ethical journalist acts with integrity.

The Society declares these four principles as the foundation of ethical journalism and encourages their use in its practice by all people in all media.

SEEK TRUTH AND REPORT IT

Ethical journalism should be accurate and fair. Journalists should be honest and courageous in gathering, reporting and interpreting information.

Journalists should:

- u Take responsibility for the accuracy of their work. Verify information before releasing it. Use original sources whenever possible.
- u Remember that neither speed nor format excuses inaccuracy.
- u Provide context. Take special care not to misrepresent or oversimplify in promoting, previewing or summarizing a story.
- u Gather, update and correct information throughout the life of a news story.
- u Be cautious when making promises, but keep the promises they make.
- u Identify sources clearly. The public is entitled to as much information as possible to judge the reliability and motivations of sources.
- u Consider sources' motives before promising anonymity. Reserve anonymity for sources who may face danger, retribution or other harm, and have information that cannot be obtained elsewhere. Explain why anonymity was granted.
- u Diligently seek subjects of news coverage to allow them to respond to criticism or allegations of wrongdoing.
- u Avoid undercover or other surreptitious methods of gathering information unless traditional, open methods will not yield information vital to the public.
- u Be vigilant and courageous about holding those with power accountable. Give voice to the voiceless.
- u Support the open and civil exchange of views, even views they find repugnant.
- u Recognize a special obligation to serve as watchdogs over public affairs and government. Seek to ensure that the public's business is conducted in the open, and that public records are open to all.
- u Provide access to source material when it is relevant and appropriate.
- u Boldly tell the story of the diversity and magnitude of the human experience. Seek sources whose voices we seldom hear.
- u Avoid stereotyping. Journalists should examine the ways their values and experiences may shape their reporting.
- u Label advocacy and commentary.
- u Never deliberately distort facts or context, including visual information. Clearly label illustrations and re-enactments.
- u Never plagiarize. Always attribute.
- u Show compassion for those who may be affected by news coverage. Use heightened sensitivity when dealing with juveniles, victims of sex crimes, and sources or subjects who are inexperienced or unable to give consent. Consider cultural differences in approach and treatment.
- u Recognize that legal access to information differs from an ethical justification to publish or broadcast.
- u Realize that private people have a greater right to control information about themselves than public figures and others who seek power, influence or attention. Weigh the consequences of publishing or broadcasting personal information.
- u Avoid pandering to lurid curiosity, even if others do.
- u Balance a suspect's right to a fair trial with the public's right to know. Consider the implications of identifying criminal suspects before they face legal charges.
- u Consider the long-term implications of the extended reach and permanence of publication. Provide updated and more complete information as appropriate.

ACT INDEPENDENTLY

The highest and primary obligation of ethical journalism is to serve the public.

Journalists should:

- u Avoid conflicts of interest, real or perceived. Disclose unavoidable conflicts.
- u Refuse gifts, favors, fees, free travel and special treatment, and avoid political and other outside activities that may compromise integrity or impartiality, or may damage credibility.
- u Be wary of sources offering information for favors or money; do not pay for access to news. Identify content provided by outside sources, whether paid or not.
- u Deny favored treatment to advertisers, donors or any other special interests, and resist internal and external pressure to influence coverage.
- u Distinguish news from advertising and shun hybrids that blur the lines between the two. Prominently label sponsored content.

BE ACCOUNTABLE AND TRANSPARENT

Ethical journalism means taking responsibility for one's work and explaining one's decisions to the public.

Journalists should:

- u Explain ethical choices and processes to audiences. Encourage a civil dialogue with the public about journalistic practices, coverage and news content.
- u Respond quickly to questions about accuracy, clarity and fairness.
- u Acknowledge mistakes and correct them promptly and prominently. Explain corrections and clarifications carefully and clearly.
- u Expose unethical conduct in journalism, including within their organizations.
- u Abide by the same high standards they expect of others.

MINIMIZE HARM

Ethical journalism treats sources, subjects, colleagues and members of the public as human beings deserving of respect.

Journalists should:

- u Balance the public's need for information against potential harm or discomfort. Pursuit of the news is not a license for arrogance or undue intrusiveness.

The SPJ Code of Ethics is a statement of abiding principles supported by additional explanations and position papers (at spj.org) that address changing journalistic practices. It is not a set of rules, rather a guide that encourages all who engage in journalism to take responsibility for the information they provide, regardless of medium. The code should be read as a whole; individual principles should not be taken out of context. It is not, nor can it be under the First Amendment, legally enforceable.

EXHIBIT 9A

5:24PM M



Re: Scoop on the Crow & Eye death



Inbox



anonymouse@email.com 3/7/24



to Dakota.Saravana@Skyview.edu ▾

I have information I think you would be interested in that links Rice to the death of Lee Reddy IV. I work in the Office of the President and have proof that the President was involved in the hazing incident that killed Reddy. We need to get justice for Reddy, and I know I can trust you to do that because of the articles you've been writing trying to hold Crow & Eye accountable.



← ▾ Reply



EXHIBIT 9B

5:24PM



Re: Scoop on the Crow & Eye death



Inbox



Dakota.Saravana@Skyview.edu



3/7/24

to anonymouse@email.com

Thank you so much for reaching out. Yes, I am definitely interested in whatever information you have linking Rice to Reddy's death. I know Rice was involved, I just haven't been able to find anything definitive showing Rice was involved. Until I have that, I can't expose Rice for the fraud they are.

You say you have proof. Can you send me whatever proof you have? I'll need that to corroborate what you are telling me.

Sincerely,
Dakota Saravana

Editor-in-Chief
The Chronicle



Reply



EXHIBIT 9C

5:24PM M



Re: Scoop on the Crow & Eye death



Inbox



Kendall.Rose@Skyview.edu 3/7/24



to Dakota.Saravana@Skyview.edu ▾

Here's what I can tell you. I was at the tree the night Reddy died, and I believe Rice was there. And I saw Rice's car on campus that evening and took the attached picture of Rice's office with the light on the night Reddy died. So I think this whole "being out of town" claim is a lie. Also, I found the attached email where Rice was invited to speak at the ceremony before the Crows go to the tree to climb it. There's no way Rice wasn't involved.



Invitation to New Member Ceremony



PDF



Reply



EXHIBIT 9D

5:24PM



Re: Scoop on the Crow & Eye death



Inbox



Dakota.Saravana@Skyview.edu



3/8/24

to anonymouse@email.com

Thanks so much for providing this information. The documents and photo really help. Plus you being an eyewitness is huge. You are a true hero for coming forward like this. This is crucial information linking President Rice to Reddy's death. I knew it couldn't be true that Rice wasn't involved. Once a Crow, Always a Crow.

Is there any way you would agree to an on the record interview? Your story is so important and it would make it stronger if we can talk so I can ask you some questions and publish where the information came from. It's always better if a source is willing to go on the record because it makes the article more credible. You've already given me enough to go on, but more facts will help us corroborate the story.

Sincerely,
Dakota Saravana

Editor-in-Chief
The Chronicle



Reply



EXHIBIT 9E

5:24PM M



Re: Scoop on the Crow & Eye death



Inbox



anonymouse@email.com 3/9/24



to Dakota.Saravana@Skyview.edu ▾

Sorry, I thought about it, and I can't take the risk of doing an interview. I need to remain anonymous. If the Crows knew that I shared anything about them with you, I don't even want to think what would happen to me. Sorry I can't do more, but I hope it's enough for you to bring to light the truth about what happened to Reddy and expose Rice for the fraud that they are. I know what I saw, and you have the power to hold them accountable.



↩ ▾ Reply



EXHIBIT 10

From: Odin@CE.com
To: DevanRice@gmail.com
Date: August 1, 2023, 3:33 PM
Subject: Invitation to New Member Ceremony

Devan,

I hope you are having a good summer. It's been too long since we've seen you at an event. I know you are trying to keep your distance and be the president for all Skyview, but don't forget that you will always be one of us and are welcome anytime. It would be great to catch up and talk about how we can support each other.

I'm also reaching out because we are starting to put together the plan for welcoming our newest members. We think we'll have an amazing new class of members. We would love to have you speak to them as part of the New Member Ceremony, which will be at the Valhalla off-campus location on October 13, 2023. You have so much wisdom to impart to these new members, and we know it would be inspiring to them to hear from a member who has reached the pinnacle of power as you have. I hope you will consider it.

Yours in wisdom,
Odin

EXHIBIT 11



EXHIBIT 12

From: DevanRice@gmail.com
To: Odin@CE.com
Date: August 3, 2023 10:47 AM
Subject: Re: Invitation to New Member Ceremony

Odin,

It was wonderful to get your email. Please know that I think of you and the others often, even if I cannot be with you. And the wisdom I gained guides me each day.

Thank you for the invitation. I wish I could be there, but I must respectfully decline. Please give my regards and enthusiastic welcome to the new members.

I'm also pleased to hear that this ceremony will take place off campus. As you know, I cannot condone anything that puts our students in danger, and I trust that you will act accordingly. Danger is no laughing matter, no matter how much wisdom one may gain from it.

Yours always,
Devan

From: Odin@CE.com
To: DevanRice@gmail.com
Date: August 1, 2023, 3:33 PM
Subject: Invitation to New Member Ceremony

Devan,

I hope you are having a good summer. It's been too long since we've seen you at an event. I know you are trying to keep your distance and be the president for all Skyview, but don't forget that you will always be one of us and are welcome anytime. It would be great to catch up and talk about how we can support each other.

I'm also reaching out because we are starting to put together the plan for welcoming our newest members. We think we'll have an amazing new class of members. We would love

to have you speak to them as part of the New Member Ceremony, which will be at the Valhalla off-campus location on October 13, 2023. You have so much wisdom to impart to these new members and we know it would be inspiring to them to hear from a member who has reached the pinnacle of power as you have. I hope you will consider it.

Yours in wisdom,
Odin

EXHIBIT 13

MPD

MORGAN POLICE DEPARTMENT

INCIDENT REPORT

CASE NUMBER: 104-01262013-A		DATE OF REPORT: 10/14/2023 TIME: 6:00		☒ ORIGINAL REPORT ☐ SUPPLEMENTAL REPORT	
DATE OF OCCURRENCE: 10/13/2023		TIME OF OCCURRENCE: Approx 23:30		DOW: ☐ Sun ☐ Mon ☐ Tues ☐ Wed ☐ Thur ☒ Fri ☐ Sat ☐ Unk	
INCIDENT LOCATION: Skyview University, 1000 University Blvd, Morgan, Virginia					
DISTRICT:		ALCOHOL: ☒ YES ☐ NO ☐ UNK		DRUG: ☒ YES ☐ NO ☐ UNK	
CASE STATUS: ☐ Cleared by arrest ☐ Exceptionally cleared ☐ Unfounded ☐ Inactive ☐ Pending arrest ☒ Pending inv. results ☐ Informational only ☐ Administratively cleared					DATE:
ATTEMPTED/COMMITTED: ☒ Committed ☐ Accessory after ☐ Accessory before ☐ Aid/abet ☐ Assault to ☐ Attempt to ☐ Conspiracy to ☐ Facilitation of ☐ Solicitation to ☐ Threat to ☐ Unfounded					
ATTACK REASON: ☐ Assault ☐ Theft ☐ Menace ☐ Concerned Citizen ☐ Mental			WEAPON TYPE: ☐ Firearm ☐ Knife/Cutting instrument ☐ Hands/Fists/Feet, etc. ☒ Other weapon		
# ENTERED:	STRUCTURE OCCUPANCY:		EVIDENCE OBTAINED: ☒ YES ☐ NO ☐ UNK		LOCATION TYPE: College campus
JUVENILE DISPOSITION: ☐ Handled w/in dept. ☐ Referred to juvenile court ☐ Referred to welfare agency ☐ Referred to other police ☐ Referred to adult court					
THEFT BY COMPUTER? ☐ YES ☒ NO ☐ UNK		FORCED ENTRY? ☐ YES ☒ NO ☐ UNK		DATE CLEARED:	
# ARRESTED: 0					
DRUG ACTIVITY: ☐ N/A ☐ Buy ☐ Deliver ☒ Use ☐ Distribute ☐ Manufacture ☐ Produce ☐ Cultivate ☒ Possess ☐ Smuggle ☐ Sell ☐ Traffic ☐ Other					
DRUG TYPE: ☐ N/A ☐ Amphetamine ☐ Barbiturate ☒ Cocaine ☐ Heroin ☒ Hallucinogen ☒ Marijuana ☐ Opium/Derivative ☐ Paraphernalia ☐ Synthetic					
QUANTITY:		UNITS: ☐ Gram ☐ Milligram ☐ Kilogram ☐ Ounce ☐ Pound ☐ Ton ☐ Liter ☐ Milliliter ☐ Dose			VALUE: \$ _____
VICTIM/OFFENDER RELATIONSHIP: Unknown					
ASSAULT/HOMICIDE CIRCUMSTANCES: Refer to narrative					
CHILDREN WERE... ☐ Involved ☐ Present ☒ N/A ☐ Both			OFFICER ACTION: ☐ Arrest family violence ☐ Arrest other offense ☐ Summons ☐ Separation ☐ Unfounded ☐ Referred to social services		
PRIOR COURT ORDERS: ☐ YES ☒ NO ☐ UNK		ALCOHOL USED BY: ☐ Aggressor ☐ Victim ☒ Both used ☐ Neither used		DRUGS USED BY: ☐ Aggressor ☐ Victim ☒ Both used ☐ Neither used	
PREVIOUS COMPLAINTS: ☒ None ☐ 1-5 ☐ 6-10 ☐ More than 10 ☐ Unknown		SERVICES: ☐ Advised ☐ Not Advised		AGGRESSOR IDENTIFIED BY: ☐ Physical evidence ☐ Testimonial ☐ Both	

CASE NUMBER: 104-01262013-A	DATE OF REPORT: 10/14/2023 TIME: 6:00	☒ ORIGINAL REPORT ☐ SUPPLEMENTAL REPORT	
BRIEF DESCRIPTION:			
<p>I was dispatched in response to an anonymous call to 911 at approx. 00:05 stating that there had been a serious accident at the Skyview University campus. I was informed that the caller refused to identify themselves and hung up almost immediately. Because the severity of the incident was unknown, EMS was also dispatched. I arrived first on the scene at approx. 00:10 on 10/14/2023.</p> <p>Upon arrival, I immediately noticed a large group of people gathered around a tree. When I approached the group, I found a male victim unresponsive at the base of the tree. I checked for a pulse and found none. I directed the group to back away from the victim. I identified eight individuals who all appeared to be college students. When I asked for names or further information, the only response I received was "lawyer."</p> <p>EMS arrived on scene and pronounced the victim deceased. Other officers also arrived on scene and helped with evidence gathering and control of suspects/witnesses. After some time, I managed to separate one of the suspects/witnesses from the others and this witness stated that the male victim had been climbing the tree when he fell. The witness stated that there had been more people present, but many fled before police arrived. The witness stated that members of school administration had been present prior to police arrival. At this point, other witnesses/suspects noticed me talking to the witness and put themselves between us and repeatedly stated "Lawyer." I attempted to engage the witness again, but no one would cooperate. All suspects/witnesses were taken into custody for further questioning after appointment of counsel.</p> <p>Scene was secured, photographs taken, and physical evidence was collected. ID found on the victim identified him as Lee Reddy IV. The body of the victim was sent to the medical examiner's office for autopsy. Campus security and university administration informed of incident.</p>			
ATTACHMENTS:		GCIC ENTRY	
☐ Persons ☐ Property ☐ Offenses ☐ Narrative		☐ Warrant ☐ Vehicle ☐ Article ☐ Boat ☐ Gun	
REPORTING OFFICER: Det. H. Landis	BADGE: 1234	DATE: 10/14/2023	
SUPERVISOR:	BADGE:	DATE:	
DATA ENTRY:	BADGE:	DATE:	
GCIC OPERATOR:	BADGE:	DATE:	

EXHIBIT 14

TAXI RECEIPT

Pick up Address Skyview University
Drop off Address Airport
Date 10/13 Amount \$45
Pick Up Time 4:15 PM Drop off Time 4:45 PM
Cab # 6318 Driver's Name Al

EXHIBIT 15

Shawn Sonti

Private Investigator | Investigative Trainer | Former CIA Operative

📍 Virginia, USA | 📞 (555) 703-1985 | ✉️ shawn.sonti@digupthetruth.com

Professional Summary

Veteran private investigator with over 35 years of investigative experience, including a decade with the CIA and more than 5,000 private investigations conducted through an independent firm. Renowned for deep psychological insight, ethical rigor, and precision in complex investigative work. Experienced educator on investigative techniques and bias mitigation. Recognized leader in the professional investigative community with a track record of publishing and professional service.

Professional Experience

Founder & Lead Investigator

Dig Up the Truth Private Investigations, Virginia

1995–Present

- Founded and operated a successful private investigation firm.
- Conducted investigations for corporations, individuals, news organizations, universities, and government agencies
- Personally conducted and overseen more than 5,000 investigations over three decades.
- Experience investigating matters involving secret societies and other hard to infiltrate organizations
- Developed internal training programs for junior investigators on surveillance, interviewing, and report writing.
- Consulted on high-profile cases involving fraud, espionage, and sensitive political matters.

Investigator

Central Intelligence Agency (CIA), Washington, D.C.

1985–1995

- Conducted national security and counterintelligence investigations with top-secret clearance.
- Collaborated with domestic and international law enforcement on covert operations.

Education

Bachelor of Science in psychology

James Madison University, Harrisonburg, VA

Graduated: 1985

Publications

“Techniques for Investigating Secret Societies,” *SPI Journal*, 2018

“Preventing Confirmation and Anchoring Bias in Your Investigations,” *SPI Journal*, 2020

Professional Leadership & Memberships

- Past President, Private Investigators Association of Virginia
- Board Member, Society of Professional Investigators (2022–Present)

Teaching & Training

- Designed and taught courses on advanced investigative techniques.
- Led workshops and seminars on identifying and mitigating bias in investigations for professional associations and law enforcement agencies.

Skills

- Surveillance & Countersurveillance
- Behavioral Analysis & Profiling
- Investigative Ethics & Bias Training
- Report Writing & Testimony Preparation
- Covert Operations & Intelligence Gathering
- Public Speaking & Professional Instruction

EXHIBIT 16

JUSTICE MARLOW

Awards and Honors

Conscience in Media Award, presented by the American Society of Journalists and Authors, 2021

Awarded in recognition for dedication to protecting sources

Pulitzer Prize in Investigative Journalism, selected by the Pulitzer Prize Board, 2016

Marlow, Justice. *One Hit, I Wonder*. Podcast audio, Feb. 2014–Mar. 2015.

MOLLY National Journalism Prize, awarded by the Texas Democracy Foundation, 2012

Marlow, Justice. “Safety Without Labels: The Plight of the ESL Workforce.” *The Morgan Times*. September 19, 2011.

Livingston Award, granted by the University of Michigan, 2011

Marlow, Justice. “Failure of the Military to Guard Mental Health.” *The New Yorker*. November 15, 2009.

Education

Hamilton College, Clinton, New York

Bachelor of Arts in Journalism, minor in Political Science, May 2002

- Honors: 2002 Journalism Student of the Year, Member of Lambda Pi Eta Honor Society
- Activities: Editor-in-Chief of *The Spectator*, 2000-2002; Staff Writer for *The Spectator*, 1998-2000

Work Experience

Journalism Professor, Skyview University, Morgan, VA, 2017-present

- Taught classes related to journalism for all years including Intro to Journalism, Feature Writing, Digital Journalism, Investigative Journalism, The History of Investigative Journalism, Narrative Writing and Storytelling, and Media Ethics
- Faculty Advisor to *The Chronicle*, advised on handling all aspects of publishing, including story selection, investigation, drafting, editing, and newspaper arrangement

Freelance Reporter, *The Morgan Times*, 2015-present

- Drafted multiple feature articles and front page bylines
- Edit articles as needed, focusing on narrative writing and storytelling

Reporter, *The New York Times*, 2002-2015

- Wrote articles covering local, national, and international news with a focus on investigative journalism pieces
- Supervised and mentored younger journalists regarding investigations, story selection, and phrasing

Freelance Reporter, Remote, 1998-present

- Wrote articles covering local, national, and international news with a focus on investigative journalism pieces
- Submitted and published in multiple newspapers across the country including *The New York Times*, *The Chicago Tribune*, *The Los Angeles Times*, and others

Selected Publications

Marlow, Justice. "King's Promised Land: Circle or Square?" *The Morgan Times*. July 14, 2025.

Marlow, Justice and Lee Reddy III. "And His Little Parrot Too." *The Morgan Times*. June 4, 2024.

Marlow, Justice. "Handwerker or Doctor: The Assumption of PhDs in Certain Fields." *The Morgan Times*. January 26, 2024.

Marlow, Justice. "Attributing a Murder to Crows: Secret Societies and Hazing Rituals." *The Morgan Times*. November 4, 2023.

Marlow, Justice. "Weather We Like It or Not: Unprepared Camp Counselors." *The Morgan Times*. August 6, 2022.

Marlow, Justice. "The Forensics of Losing a Best Friend: Interview with a Student Who Definitely Did Not Push Anyone." *The Morgan Times*. August 12, 2022.

Marlow, Justice. "Factory Crime Brûlée." *The New York Times*. February 27, 2021.

Marlow, Justice. "The Wrong Corona for Summer." *The Morgan Times*. March 30, 2020.

Marlow, Justice. "Digital Peg Legs and Parrots: Teenage Piracy on the Digital Seas." *The Chicago Tribune*. November 8, 2019.

Marlow, Justice. "A Real Life Murder on the Orient Express." *The Morgan Times*. April 14, 2018.

Marlow, Justice. "Homeless Murderer or Easy Scapegoat? Treatment and Perception of the Least Protected Among Us." *The Morgan Times*. March 18, 2016.

Marlow, Justice. *One Hit, I Wonder*. Podcast audio, February 2014- March 2015.

<https://www.notanactualpodcast.org/2014/12345678910/one-hit-i-wonder>.

Marlow, Justice. "Death by a Little Blue Pill: Murder, Malpractice, or Misbegotten Merriment?" *The Morgan Times*. August 23, 2013.

Marlow, Justice. "Two Can Keep a Secret If They're Both in the Same Society." *The Los Angeles Times*. January 3, 2013.

Marlow, Justice. "Safety Without Labels? The Plight of the ESL Workforce." *The Morgan Times*. September 19, 2011.

Marlow, Justice. "Failure of the Military to Guard Mental Health." *The New Yorker*. November 15, 2009.

Marlow, Justice. "The Impact of Local Politics: Does Your Vote Count?" *The Morgan Times*. October 29, 2007.

Marlow, Justice. "New York's Olympic 'Dream' Too Strong a Word." *The New York Times*. June 18, 2005.

Marlow, Justice. "Underage Drinking on Campus: Partying or Hazing?" *The Waterville Times*. April 2, 2002.