

MICHIGAN STATE UNIVERSITY
DISMISSAL FOR CAUSE HEARING COMMITTEE

In the Matter of Dr. Selman Akbulut

DISMISSAL FOR CAUSE HEARING
BEFORE COMMITTEE MEMBERS JOHN WM. REIFENBERG, JR.,
JAMES SMITH AND GALE STRASBURG
COUNSEL FOR MSU: WILLIAM WHITBECK
East Lansing, Michigan - Thursday, August 22, 2019

APPEARANCES:

For the Charging Party: DR. KEITH PROMISLOW
Michigan State University
Department of Mathematics
College of Natural science
D207 Wells Hall
619 Red Cedar Road
East Lansing, Michigan 48824
517.355.9680
kpromisl@math.msu.edu

MS. THERESA KELLEY
Michigan State University
Associate General Counsel
Office of the General Counsel
426 Auditorium Road, Room 494
East Lansing, Michigan 48824
517.353.3530
kelleyt@msu.edu

For the Faculty Member: MS. AMY DOUKOURE
Council on American-Islamic
Relations
30201 Orchard Lake Road, Suite 260
Farmington Hills, Michigan 48334
248.559.2247
adoukoure@cair.com

ALSO PRESENT:
REPORTED BY:

Ms. Kara Yermak
Ms. Connie S. Coon, CSR-2709, RPR
Certified Shorthand Reporter
1.800.878.8750

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TABLE OF CONTENTS

WITNESS:	PAGE
----------	------

EYLEM YILDIZ

CROSS-EXAMINATION BY DR. PROMISLOW	4
REDIRECT EXAMINATION BY MS. DOUKOURE	25

SELMAN AKBULUT

DIRECT EXAMINATION BY MS. DOUKOURE	33
CROSS-EXAMINATION BY DR. PROMISLOW	147

EXHIBITS:	MARKED
-----------	--------

FACULTY MEMBER EXHIBIT 3	56
FACULTY MEMBER EXHIBIT 4	66
FACULTY MEMBER EXHIBIT 5	70
FACULTY MEMBER EXHIBIT 6	72
FACULTY MEMBER EXHIBIT 7	74
FACULTY MEMBER EXHIBIT 8	75
FACULTY MEMBER EXHIBIT 9	78
FACULTY MEMBER EXHIBIT 10	79
FACULTY MEMBER EXHIBIT 11	81
FACULTY MEMBER EXHIBIT 12	83
FACULTY MEMBER EXHIBIT 13	83
FACULTY MEMBER EXHIBIT 14	85
FACULTY MEMBER EXHIBIT 15	91
FACULTY MEMBER EXHIBIT 16	96
FACULTY MEMBER EXHIBIT 17	99
FACULTY MEMBER EXHIBIT 18	111
FACULTY MEMBER EXHIBIT 19	114
FACULTY MEMBER EXHIBIT 20	131
FACULTY MEMBER EXHIBIT 21	141
FACULTY MEMBER EXHIBIT 22	145

1 East Lansing, Michigan

2 Thursday, August 22, 2019

3 12:07 p.m.

4 R E C O R D

5 MR. REIFENBERG: So any time. This is cross.
6 Are you going to sit there? That's okay.

7 DR. PROMISLOW: It's cross-examination.

8 CROSS-EXAMINATION

9 BY DR. PROMISLOW:

10 Q. Is it okay if I call you Eylem?

11 A. Yes.

12 Q. I am Keith Promislow. You know that, right?

13 A. Yes.

14 Q. In your testimony yesterday, do you recall describing
15 Professor Akbulut as the greatest person you had ever
16 met?

17 A. What did I call?

18 Q. Do you recall describing Professor Akbulut as the
19 greatest person you ever met?

20 A. Yes. Probably I say one of the greatest person, not
21 the greatest.

22 Q. So you have learned a lot of the math from Professor
23 Akbulut?

24 A. That's true.

25 Q. Between fall semester 2013 and fall semester 2016,

1 seven semesters at MSU, would it sound right to you if
2 I told you you took about 17 graduate courses? Is
3 that reasonable? That would be for seven semesters.
4 Did you take roughly 17 graduate courses?
5 A. Let me recall.
6 Q. It doesn't have to be exact.
7 A. I mean, I try to remember. If I took around two or
8 three course semester, probably 10, 15. Close.
9 Q. Do you recall taking Professor Akbulut's 996 Tops
10 course on --
11 COURT REPORTER: I'm sorry. I'm having
12 trouble understanding you. Maybe you're a little
13 close.
14 DR. PROMISLOW: Too close?
15 MS. DOUKOURE: I think it's reverberating.
16 It's missing that cushion thing.
17 (12:09 p.m. - 12:10 p.m. off the record.)
18 Q. (BY MR. PROMISLOW) Let me start over again on that.
19 Do you recall taking, do you recall if you took
20 Professor Akbulut's 996 Topics course on 4-manifold in
21 fall semester of 2013?
22 A. '13 you are asking?
23 Q. 2013.
24 A. My first semester in Michigan State University, yes.
25 Q. And in the next semester, do you remember taking his

1 996 Topics class on G2 methods?

2 A. Yes.

3 Q. So in your first seven semesters did you take a class

4 from Professor Akbulut almost every semester, almost

5 every semester the first seven?

6 A. I don't know. Probably. You have the record. You

7 can tell.

8 Q. Did he support you as an RA on his grant as a research

9 associate?

10 A. It happened.

11 Q. And did he support you from his grant to attend

12 conferences in Gokova, Turkey and Mexico?

13 A. Mexico, I don't think so. Mexico was completely

14 different organization.

15 Q. It wasn't conference, okay.

16 A. In Turkey, yes. Yeah.

17 Q. In your testimony yesterday, do you recall saying that

18 the five-student course registration rule imposed

19 October 20th of 2014 was fake?

20 A. Yes, it is.

21 Q. In the fall semester 2014, do you recall receiving

22 reminder emails just to register for classes before?

23 A. Yes.

24 Q. Didn't you also -- the reminder emails came before the

25 October 20th, 2014 deadline. They were in advance of

1 that apparently.

2 A. It's possible. I don't remember.

3 Q. Didn't you also receive an email from Professor
4 Akbulut sent to all graduate students asking them to
5 register for his Math 996-002 class?

6 A. During that time, we received like ten emails from
7 many professors like encouraging people. I don't
8 remember in particular one.

9 Q. You don't remember if it said --

10 A. I don't remember any particular one.

11 Q. If I could finish my question before you answer.

12 Do you remember, did the email say the class
13 was underenrolled and could be cancelled at that time?

14 MS. DOUKOURE: I am going to object. This
15 witness testified that she doesn't recall any
16 particular email.

17 MR. REIFENBERG: That's true.

18 DR. PROMISLOW: She said that before I
19 finished my question.

20 MS. DOUKOURE: She said that after the last
21 question and before he started to question.

22 MR. REIFENBERG: Can you please modify the
23 question.

24 Q. (BY DR. PROMISLOW) Okay. Were you aware that there
25 were five graduate courses that were cancelled for

1 underenrollment on October 20th, 2014?

2 A. No, I never get a chance that they would cancel that
3 class. I knew I had time. Jon Wolfson blocked Selman
4 Akbulut on purposely. I believe we all knew that, but
5 we would never think that he will cancel, he be able
6 to cancel that class ever. He didn't give any single
7 chance for that.

8 Q. That's not the question I asked though. The question
9 I asked is were you aware that five graduate courses
10 were cancelled for underenrollment, five different
11 graduate courses, courses not students, five different
12 graduate courses were cancelled for underenrollment on
13 October 20th, 2014?

14 A. No, I don't remember. I remember the course with four
15 students didn't cancel at all. It was NiashaOpa (sp).
16 It was a reading class. It wasn't any other class
17 that you can make any excuse about that.

18 Q. That's not the question I asked you.

19 A. If there is a -- I remember one class which is
20 cancelled because the professor agreed to not to teach
21 the --

22 MS. DOUKOURE: I am going to ask that she be
23 allowed to complete her answer before he starts
24 talking.

25 MR. REIFENBERG: Please answer the question.

1 THE WITNESS: I also know that the class
2 involved is -- I mean in confidence. I don't remember
3 what -- like after a report or, or before. Like did
4 the professor decide not to give the class? There are
5 such cases. There are other ones that it belongs
6 consent. If the professor consented, he just changed
7 what, his mind, or he is able not to give it up?
8 That's possible that they cancelled such classes.

9 DR. PROMISLOW: Can I ask you to instruct the
10 witness.

11 MR. REIFENBERG: When he asks a question,
12 answer that question directly, not anything else.

13 THE WITNESS: Sure.

14 Q. (BY DR. PROMISLOW) Previously in this hearing we have
15 heard testimony from Rajesh Kulkarni, Professor Rajesh
16 Kulkarni, Professor Matt Hedden, Professor George
17 Pappas indicating that they have had their classes
18 cancelled for underenrollment. Do you have any basis
19 to disagree with these statements?

20 A. I never remember that they cancelled one of the
21 classes for underenroll. I have no such memory, and I
22 am student. I was following all these classes. I
23 don't think that's a true statement, as if I can't
24 count four menus.

25 MR. REIFENBERG: So you don't remember?

1 THE WITNESS: No.

2 DR. PROMISLOW: Thank you.

3 Q. (BY DR. PROMISLOW) The office at MSU that's
4 responsible for investigating discrimination is the
5 OIE office, isn't that right?

6 A. Yes.

7 Q. Is it true that I, or really anybody, is prohibited
8 from conducting their own investigation into
9 allegations of discrimination?

10 A. I don't get the question.

11 MS. DOUKOURE: I am going to object. How is
12 this witness capable of testifying about internal
13 policy about the OIE?

14 MR. REIFENBERG: That's true.

15 DR. PROMISLOW: She testified at length about
16 discrimination at the OIE investigation, and it's
17 appropriate to clarify, make sure she understands the
18 rules under which people have to engage.

19 MS. DOUKOURE: She testified about her own
20 participation in two separate investigations, one
21 where she was the complaining witness and one where
22 she was the subject of the investigation. She did not
23 testify about the interworkings of the OIE office. We
24 don't know what he is asking her to testify about, and
25 that is improper.

1 DR. PROMISLOW: Every student knows the
2 training about OIE processes.

3 MR. REIFENBERG: Can you rephrase the
4 question, because you are asking for something that
5 she wouldn't necessarily know about.

6 MS. KELLEY: Well, we can ask her if she
7 knows.

8 MR. REIFENBERG: Well.

9 Q. (BY DR. PROMISLOW) Do you know if the only agency on
10 campus that is authorized to conduct investigations
11 into discrimination is the OIE agency?

12 A. I don't.

13 Q. You were a claimant in the OIE case against Jon
14 Wolfson, is that true?

15 A. True.

16 Q. So you have a copy of the transcript?

17 A. Possible.

18 Q. Report.

19 A. I had the report, yes.

20 Q. It's true that I cooperated with the investigation,
21 isn't it?

22 A. You mean you testifying as a witness of Jon Wolfson in
23 the report, that's true.

24 Q. So I cooperated and provided testimony, is that
25 correct?

1 MS. DOUKOURE: I am going to object to form
2 of the question. First of all, compound question.
3 You are asking for two separate questions in the same
4 question.

5 Second of all, he is asking her -- he has to
6 define what cooperating means. This witness already
7 answered -- has been asked and answer whether he
8 participated. She has said yes.

9 MR. REIFENBERG: Can you hold on just a
10 second.

11 Do you know whether the OIE reports are
12 confidential?

13 DR. PROMISLOW: They start as confidential.

14 MS. KELLEY: Well, normally they are
15 confidential. There are certain circumstances they
16 can be released. If someone FOIAs, in some situations
17 they are released. If a party releases his own report
18 that he receives, whether he is a complainant or
19 respondent, we don't take any action, but we expect
20 the process to be confidential to the extent possible,
21 but we don't take action if someone discloses it, and
22 sometimes it's available under FOIA. I mean, that's
23 the best answer I can give you on that.

24 Can I add -- I'm sorry. In this case it's my
25 understanding that the report involving Professor

1 Wolfson has been widely disseminated, so that's the
2 question. I don't think there is any issue of
3 confidentiality about that among the people in this
4 room.

5 MR. SMITH: So that's what the issue is.
6 Everybody in this room has access to it, but once it
7 becomes part of this record, it doesn't go beyond.

8 MS. KELLEY: But the witness has already
9 testified about it, so I think we are allowed to
10 cross-examine her on it.

11 MS. DOUKOURE: I was going to say that what
12 she testified to is present tense. Remember what was
13 in the report and what happened during the
14 investigation, and that necessarily wouldn't be
15 confidential either.

16 MR. REIFENBERG: Wouldn't be?

17 MS. DOUKOURE: I don't believe so, no.

18 MR. REIFENBERG: No, I was just trying to --

19 MS. DOUKOURE: Correct. I'm sorry. Yes, it
20 would not be confidential.

21 MR. REIFENBERG: Okay. Go ahead.

22 MS. DOUKOURE: Not me, him.

23 Q. (BY DR. PROMISLOW) Eylem, you testified that rules
24 should make things run smoothly in the context of
25 course cancellations, is that correct?

1 A. Correct.

2 Q. Do you know roughly how many graduate students there
3 are in the math department at MSU?

4 A. Eighty, hundred maybe.

5 Q. Students in math typically take courses for most of
6 the time as graduate students, don't they? They take
7 courses in second, third, and fourth year, don't they?
8 They don't stop taking classes?

9 A. I don't understand.

10 MS. DOUKOURE: I object. That's at least
11 four questions.

12 Q. (BY DR. PROMISLOW) Do graduate students in math
13 typically take classes, they enroll in classes, for
14 most of their time as graduate students, most of the
15 years they are graduate students?

16 A. They enroll. I mean, in the last three years, yeah.
17 Like, I mean, there are different levels -- yeah,
18 that's true. Yeah, true.

19 Q. Graduate students also often teach, don't they?

20 A. Yes.

21 Q. So they might have more than one class in a semester?
22 They may have class and reservations? Would that be
23 typical? Would that be a typical load for you?

24 A. Yes.

25 Q. So would that present a sort of a complex scheduling

1 problem, getting all the schedules together?

2 A. No.

3 Q. I would like to hand you an exhibit from Binder -- I
4 would like to hand you Exhibit FM-2 from Binder Tab
5 F11 from the Akbulut binder.

6 MS. DOUKOURE: Which exhibit was the second
7 one?

8 DR. PROMISLOW: F11.

9 MS. DOUKOURE: No, I mean -- FM-2?

10 DR. PROMISLOW: Yeah, FM-2.

11 MS. DOUKOURE: Page 11, okay.

12 DR. PROMISLOW: I'm sorry, F page 11.

13 MS. DOUKOURE: I just wanted to make sure.

14 MR. REIFENBERG: Ten?

15 DR. PROMISLOW: Page 11. Eleven with a
16 circle on it. FM-2 F11.

17 Q. (BY MR. PROMISLOW) Do you recall this document?

18 A. Yes.

19 Q. Can you give us a brief description of it?

20 A. That's the email that I asked Britta to consider our
21 teaching for the class, because officially they
22 forcibly dropped all our enrollment from that class,
23 and they did cancel that class.

24 MR. REIFENBERG: And they did cancel that
25 class?

1 JUDGE WHITBECK: Did you say "falsely"?
2 THE WITNESS: Force.
3 JUDGE WHITBECK: Falsely?
4 THE WITNESS: Force.
5 JUDGE WHITBECK: As in erroneously or --
6 MR. SMITH: Forcibly.
7 JUDGE WHITBECK: Forcibly.
8 THE WITNESS: Forcibly.
9 JUDGE WHITBECK: I got you. I didn't
10 understand you.
11 Q. (BY DR. PROMISLOW) So is this email addressing the
12 problem of graduate student course schedules and
13 teaching schedules lining up? Is that the purpose of
14 the email?
15 A. Yes.
16 Q. Could you see how that can be quite hard to do if the
17 courses grad students themselves are taking are not
18 picked far enough in advance, if the grad courses are
19 changing while the teaching schedule is --
20 A. I don't understand your question. Ask again.
21 Q. Could you see how it would be a problem if there were
22 many graduate courses for which the grad students were
23 enrolling and at the same time the graduate's teaching
24 schedule had to be arranged at the same time, would
25 that be a problem?

1 A. Like for instance in one hour, in one day, in two
2 days? What do you mean by at the same time? There
3 are students. There are like 15 days here we've been
4 fighting for as well. Like 15 days? At the same
5 time? I don't know. I don't understand your
6 question.

7 Q. Let me see if I can rephrase it a little bit more
8 eloquent.

9 If you were assigned the task of aligning
10 graduate students' course enrollment and their
11 teaching schedules and if the course enrollment was
12 changing or fluctuating, students were dropping in and
13 out of classes that they were enrolled in and at the
14 same time having to adjust their own teaching
15 schedule, could that become a complex problem?

16 A. No, not a problem. I'm teaching right now in Harvard.
17 People are still enrolling in my classes. I will be
18 teaching in two weeks. I have only two weeks. There
19 are two or three students in my class right now. In
20 my Topics class, there are two students. There are
21 students coming and going. Nobody go around, no, you
22 cancel classes. Classes are there. People, sometimes
23 they change. There is extreme cases. If everyone
24 drops the class, you can cancel the class. But, I
25 mean, other than this, there are no problems. It was

1 always working in that way. You are just trying to
2 manipulate it. Don't manipulate it, please.

3 Q. So you don't think that a clearly articulated course
4 cancellation policy is necessary?

5 A. What is this course cancellation policy?

6 Q. Do you think there needs to be a clearly articulated
7 policy for cancelling graduate student courses?

8 A. They have never been clearly articulated at MSU math
9 department. Like you make rules, and next semester
10 you change rules. Next semester you change number.
11 Next semester you change date. Like everything was
12 clearly all the time changing, and normally they are
13 flexible. That's what I am saying.

14 Q. Do you know if there was any disciplinary action taken
15 against Professor Wolfson after his OIE discrimination
16 finding?

17 A. No. I asked you. I asked you about that. You told
18 me that's confidential. The decision is made by Terry
19 Curry. You cannot tell us because confidential. I am
20 the victim and the rules are confidential. The rules
21 is on the table to protect victims that now you are --

22 Q. Could you answer the question.

23 MR. REIFENBERG: Excuse me. Could you just
24 answer his question.

25 THE WITNESS: Sure.

1 MR. WHITBECK: And the answer was no?

2 THE WITNESS: Yeah.

3 Q. (BY DR. PROMISLOW) Isn't it true that disciplinary
4 measures taken towards faculty and staff and students
5 are typically confidential?

6 A. I am part of it. What confidential are you talking
7 about? I was part of it. You have to talk to me.

8 Q. I am talking about the disciplinary actions that a
9 faculty, staff, or grad student could receive as the
10 result of findings. The disciplinary measure is
11 typically confidential.

12 MS. DOUKOURE: I am going to object. That
13 wasn't a question. It wasn't even a question. There
14 was no interrogatory at the end of it or at the
15 beginning of it. He clearly just made a statement.

16 MR. REIFENBERG: Can you focus the question?

17 DR. PROMISLOW: Yes. Sorry.

18 Q. (BY DR. PROMISLOW) I started the question. I
19 rephrased it as a statement.

20 Isn't it true that disciplinary measures that
21 can be received by faculty staff or graduate students,
22 the measures themselves are typically confidential?

23 MS. DOUKOURE: If you know.

24 THE WITNESS: I don't. Let me tell you what
25 I know. Like, for instance, the OIE, the OIE

1 investigation process, there are some findings, but we
2 were part of it. Wolfson was part of it, and I was
3 part of it. You cannot, you cannot keep the
4 conclusion like away from me because making excuse of
5 confidentiality. You have to inform me at some point,
6 right? That's my understanding.

7 MR. REIFENBERG: Can you just answer his
8 question.

9 MS. DOUKOURE: I am going to object to this,
10 and I am going to object to this on several grounds,
11 several, several grounds, because when I complained
12 about the witnesses not being responsive, we were told
13 that they are allowed to answer a question, and if
14 somebody has a problem with how they are answering
15 questions, this panel was not allowed to interject in
16 those questions -- in those answers unless somebody
17 asked them to.

18 This is the third time that this panel has
19 requested that this witness stop speaking without
20 being requested by the Charging Party, and that sets
21 an unfair standard as what has happened over the last
22 four days of questioning.

23 MR. REIFENBERG: Can you please phrase your
24 question so she can answer it yes or no?

25 DR. PROMISLOW: Yes.

1 Q. (BY DR. PROMISLOW) So this is a yes-or-no question.
2 If I told you that as chair of the math department I
3 imposed discipline on Jon Wolfson, you wouldn't have a
4 basis to disagree with that, would you?

5 A. I don't understand the question.

6 Q. Let's see if I can rephrase it. Do you know if I
7 disciplined Jon Wolfson?

8 DR. DOUKOURE: Objection, asked and answered.
9 She already said no.

10 MS. KELLEY: May I say something, please?

11 DR. PROMISLOW: She said she didn't
12 understand the question.

13 THE WITNESS: You asked the question --

14 MS. DOUKOURE: You can't say anything.

15 This is the fourth time you have asked that
16 question. She has said no every single time.

17 DR. PROMISLOW: That is not the fourth time.

18 MR. REIFENBERG: Can you ask the question
19 again then, please.

20 Q. (BY DR. PROMISLOW) Do you know if I imposed
21 discipline on Jon Wolfson for the OIE findings?

22 A. As far as I know, you didn't.

23 Q. Thank you. If Jon Wolfson had received a letter of
24 reprimand in his permanent file as discipline for his
25 OIE finding, would you consider that a large penalty

1 or a small penalty?

2 A. What was the question?

3 Q. If Jon Wolfson had received a letter of reprimand --

4 A. What is reprimand?

5 MR. PROMISLOW: May I inform her?

6 MS. DOUKOURE: Yes. I have no objection.

7 Q. (BY DR. PROMISLOW) A letter of reprimand is a formal
8 letter of lodging a finding of -- I'm thinking of a
9 better way -- form of discipline, the letter
10 indicating that you were being disciplined. It goes
11 in the official file, so that's a letter -- a letter
12 of reprimand is an official letter of discipline.

13 MR. REIFENBERG: Could you repeat the
14 question, given that you have --

15 Q. (BY MR. PROMISLOW) Now that I have tried to clarify
16 that discipline letter, the question is, if
17 Jon Wolfson had received a letter of reprimand in his
18 permanent file as a result of his OIE investigation,
19 would you consider that a large penalty or a small
20 penalty?

21 A. I don't know about anything about penalty. I don't
22 see like you are talking about any penalty that I
23 could consider like small or large.

24 Q. So would you think it would be an appropriate penalty
25 for Jon Wolfson, given the severity of his OIE

1 findings, that his penalty be a letter of reprimand?
2 Would that be appropriate?

3 A. Let me clarify if I am understanding correctly.

4 Q. Yeah.

5 A. You are saying that is a penalty. You told
6 Jon Wolfson that he has -- there is some report
7 concluding that Jon Wolfson violated
8 anti-discrimination policy of the MSU, and you're
9 writing, rewriting and sending email to Jon Wolfson,
10 and you right now asking me if this is a penalty even.
11 I don't know. I don't think so.

12 Q. So maybe -- I'm not sure you are understanding the
13 question, but you may be. So if Jon Wolfson received
14 the OIE finding and then in addition to that he
15 received a letter of reprimand --

16 A. From you.

17 Q. -- which sits inside of his permanent personnel file,
18 for anyone to look at his file it would be there,
19 would that be a significant penalty?

20 A. Rewriting the OIE report to Wolfson, no.

21 Q. No, that's not --

22 A. I don't understand what you're saying. I don't see
23 it, anything there. Like writing Jon Wolfson that he
24 got a like reprimand? I don't understand what you are
25 asking.

1 MR. REIFENBERG: Can you try to make the
2 question simpler so that she understands it.

3 DR. PROMISLOW: Yeah. Let me see.

4 Q. (BY MR. PROMISLOW) A letter of reprimand is like a
5 formal scolding that someone receives from their
6 direct superior. So if Jon Wolfson as a consequence
7 of the OIE report received a letter of reprimand from
8 me, would you consider that to be an appropriate
9 punishment for the findings in the OIE report?

10 A. It's not a punishment. I consider it -- I wouldn't
11 consider it a punishment.

12 Q. So you think it would be too low?

13 A. I'm not saying it's low or high. I don't see any of
14 that.

15 Q. So it's not a punishment at all?

16 A. Writing a letter to someone?

17 Q. That's not a punishment at all?

18 A. Writing a letter to someone is not punishment.

19 MR. REIFENBERG: She answered.

20 DR. PROMISLOW: That's good. Okay. That's
21 my last question.

22 MS. DOUKOURE: Can I redirect before you guys
23 ask questions?

24 MR. REIFENBERG: Sure.

25

REDIRECT EXAMINATION

BY MS. DOUKOURE:

Q. On cross-examination, Charging Party asked you several questions about your course load in 2013. Do you recall testifying about the courses that you had taken? You have to say yes or no.

A. Yes.

Q. These are being recorded by the person sitting in front of you. If you nod your head, they can't record that. You have to say yes or no.

A. Okay.

Q. Thank you. And Charging Party asked you about all the classes you took with Professor Selman Akbulut, correct?

A. No.

Q. He didn't. He asked you about how many of the classes that you took?

A. But those are many classes I took from many, many other people. Yeah, I took some classes from Selman.

Q. And did you take classes solely from Selman or from other people?

A. From other people, like mostly from other people maybe.

Q. On cross-examination Charging Party asked you about the rules, your prior testimony regarding rules making

1 things smoother. Do you recall testifying about that?

2 A. I say that.

3 Q. How often did the rules change regarding enrollment
4 for graduate classes since Keith Promislow has become
5 graduate master's chair?

6 A. Every year. In year 2014 they -- I mean -- okay. I
7 think his five-students rule somehow was there. They
8 didn't make that rule, but they liberally apply that
9 rule. Then suddenly, because of that fall
10 cancellation, they try to apply it, because
11 five-student rule was there during classes of mine.
12 That's information that I told to Katmoso (sp), so
13 then they try and impose that suddenly. Then they saw
14 that didn't work at all, because it's impossible to
15 teach such early classes, the Topics classes.

16 In next year, they just wait for students,
17 then they change the deadlines. The deadline was they
18 imposed Selman like, for instance, October 21st. Then
19 in the next year, right after they changed things
20 again, they say that, okay, so we have three steps
21 now. You apply like if you have that many students in
22 that, like in that interval, you give another chance.
23 If you have like that many students in the second
24 interval, we will give you that kind of chance, but
25 they change a lot. Like, they changed everything a

1 lot.

2 Q. So do you feel like there was sexism in place?

3 A. Sexism?

4 Q. Yeah.

5 A. No way. There is no.

6 Q. Do you feel that the rules, that the changing of the
7 rules that you just testified to, made it easier or
8 harder on the graduate students?

9 A. For the undergrad students?

10 Q. For the graduate students.

11 A. I mean, normally -- the rule that they never applied
12 before, it was like horrible for us, because they
13 destroy for all semester because that rule. After
14 that they just trying to make it there are rules, also
15 the rules are kind of reasonable, because the first
16 things that they apply to Selman, for the first time
17 ever, was completely unreasonable. They just make it
18 more flexible and more flexible by the time on the
19 way.

20 Q. And you testified that you were aware of a course that
21 was to run in the spring of 2015 that on the
22 October 20 deadline only had four students?

23 A. Yes.

24 Q. Do you know who taught that course?

25 A. Sasha Volberg. I think, yeah, Sasha Volberg. He is a

1 Russian mathematician.

2 Q. When you testified on cross-examination, you were
3 asked about whether or not you believed it was harder
4 for the scheduling office to make -- let me finish,
5 please -- to make schedules because of teaching
6 assignments. Were graduate students allowed to change
7 courses after October 20th?

8 A. Of course.

9 Q. How long after October 20th could you have changed
10 courses?

11 A. Any time, even semester starts. You can find that
12 information on the register page of Michigan State
13 University, and those rules apply uniformly to all of
14 us.

15 Q. So if a semester started and somebody wanted to change
16 classes, would they, would their teaching -- or their
17 teaching might have to be rescheduled?

18 A. Yes.

19 Q. So would you believe that that's something that the
20 graduate office that does the scheduling dealt with on
21 a regular basis, people changing classes?

22 A. They always accommodate you. It happen to me before
23 that. I mean, they change my schedule after the
24 semester -- no, just before the semester start with
25 respect to my schedule, they did it during the class

1 model.

2 Q. Professor Promislow gave you an exhibit. Do you still
3 have that exhibit?

4 A. Yes.

5 Q. I am referencing what is an exhibit that Professor
6 Promislow was just taking about. Do you recall
7 testifying about this exhibit?

8 A. Are you talking about Exhibit 2?

9 Q. Exhibit 2, yeah.

10 A. Do I what?

11 Q. Are you aware, do you recall testifying about this
12 exhibit?

13 A. Yes.

14 Q. Can you tell me the date, the date on the email is?

15 A. My email is November 5.

16 Q. November 5.

17 A. (Nodding head.)

18 Q. And I think you testified already about how long after
19 the course was cancelled was this?

20 A. It was at least ten day after the course cancellation.

21 Q. On November 4th, when you sent this email, what other
22 student had been able to change the classes that they
23 were in?

24 A. They were, everyone were able to change their classes.
25 I am telling you, in fact, Amina (sp) enrolled to that

1 class, which was open with the four students, both for
2 Sasha Volberg class at that time on June -- I'm sorry,
3 January something, like January maybe 16 or something
4 like that, weeks after the semester starts.

5 Q. Thank you. Professor Promislow asked you about his
6 participation in the OIE investigation against
7 Jon Wolfson a minute ago. Do you remember testifying
8 about that?

9 A. Yes.

10 Q. At the time, at the time, how would you characterize
11 Professor Promislow's involvement in the OIE report?

12 A. He tried to cover up the things that we were
13 complaining about as students. He participated and he
14 literally tried to help Jon Wolfson's action are
15 accurate. And I, in spite of all the things -- yes,
16 sir, I gave one example yesterday. It's about
17 distribution of finding between the graduate students.
18 It was a bias. There was like open nepotism, and we
19 met issue about this, and Keith testified that, you
20 know, like things are going under his knowledge, and
21 he tried to make excuses about those.

22 Q. At that time, if you know, did Professor Promislow
23 have a position of authority over Jon Wolfson?

24 A. He never has any authority over Jon Wolfson.

25 Q. At that time, what was Professor Promislow's position,

1 if you recall?

2 A. He was a chair.

3 Q. And at that time, what was Professor Wolfson's

4 position?

5 A. If I remember correctly, he was like second chair, he

6 was graduate chair. He was like in everyone's -- he

7 was like, yeah, everything in the department.

8 Q. Do you know how Professor Wolfson obtained those

9 positions? Do you know how Professor Wolfson obtained

10 his chair position?

11 A. Appointed by chair.

12 Q. And the chair was?

13 A. Chair was Keith Promislow.

14 Q. Do you believe -- strike that.

15 After Jon Wolfson was found by the OIE to

16 have discriminated against graduate students, did he

17 still hold a position of authority over graduate

18 students?

19 A. Yes.

20 Q. Did he still hold a position of authority over

21 graduate students who were in the subject class for

22 which he discriminated --

23 A. Yes.

24 Q. -- meaning -- do you think that it's appropriate

25 punishment for somebody who has been found to have

1 graduated -- I'm sorry, discriminated against students
2 to still hold a position of authority over those
3 students?

4 A. No, it was so unacceptable for us. It was humiliating
5 for us. We did everything to change that fact, but it
6 didn't work out.

7 Q. And did you complain?

8 A. Yes.

9 Q. And to whom did you complain?

10 A. We wrote. I mean, we wrote. I wrote -- we wrote to
11 human resources. We wrote to Keith Promislow about
12 their decision, but literally he said -- like he
13 intimidated us when we asked him. Then we started to
14 write, like I literally complained about it to
15 Graduate Employees Union. That's my union. I tried
16 to go every offices in the university that I can, and
17 later, after, I talked to like many other offices in
18 MSU.

19 Q. So you did talk to Professor Promislow?

20 A. He emailed me. I didn't talk to him. Emailed him and
21 asked him about the decision, about the, you know,
22 about their decision about the OIE, and he intimidated
23 us by saying that those things are confidential, and
24 the decision are made by Tetra Ann Seikel (sp) from
25 the human resources.

1 MS. DOUKOURE: I have no further questions.

2 JUDGE WHITBECK: Thank you.

3 MR. REIFENBERG: You are excused.

4 MS. DOUKOURE: Thank you.

5 I am going to call for Professor Akbulut to
6 testify; however, Professor Akbulut would like to use
7 the bathroom first.

8 MR. REIFENBERG: Sure.

9 MS. DOUKOURE: Thank you.

10 DR. PROMISLOW: Does that apply to everybody?

11 MS. DOUKOURE: Yes.

12 (Off the record 12:50 p.m.-12:56 p.m.)

13 COURT REPORTER: Raise your right hand. Do
14 you swear the testimony you are about to give will be
15 the truth, the whole truth, and nothing but the truth?

16 PROFESSOR AKBULUT: Yes, I do.

17 SELMAN AKBULUT,
18 having been first duly sworn, testified as follows:

19 DIRECT EXAMINATION

20 BY MS. DOUKOURE:

21 Q. Could you please state and spell your name for the
22 record.

23 A. Selman Akbulut, S-e-l-m, like Mike, a-n, like Nancy.
24 A-k-b, like boat, u-l-u-t, like time.

25 Q. Can you tell us, Professor Akbulut, how long you have

1 been with Michigan State University?

2 A. Thirty-seven years.

3 Q. And how long have you been tenured at Michigan State?

4 A. Since 1985.

5 Q. Prior to you being Abrogation of Duty Penalty at MSU
6 that happened in 2015, had you ever been disciplined
7 by MSU before?

8 A. No.

9 Q. But how many conferences have you organized at MSU?

10 A. Many conferences. On campus? You mean on campus?

11 Q. On campus.

12 A. Many conferences. I used to organize Geometry and
13 Topology conferences here. I had conferences that I
14 cooperated, Hennessey Conference, that we might
15 Russian speakers, and they also in geometry, and many,
16 many. We also organized FRG Conferences. That means
17 Focused Research Conferences and meetings here.

18 Q. And how many conferences have you participated in,
19 either here or internationally, since 2015?

20 A. Well, in 2015 I had three NSF grants, one focused
21 research grant. We are the leading institutes.
22 Michigan is the third. I am the PI, and this grant is
23 a group of us together -- Stanford University,
24 Brandeis, University of Miami, and all participants
25 from university. And we have one conference a year

1 and one workshop a year. Conferences in different
2 university, like University of Minnesota, Stanford
3 University, et cetera, and workshops were in Miami
4 always. So that's one duty.

5 And then there was the Gilmore conference
6 grant. This is a famous international geometry
7 topology conference founded by the National Science
8 Foundation, because their conferences benefit a lot of
9 organizations, so National Science Foundation gives
10 funding towards making a visit to the conference, and
11 then we had sources from other European conferences,
12 et cetera, and then those things were every year since
13 1992 in Gilbera (sp). That's a nice part of the
14 Eastern Mediterranean, and everyone loves this. We
15 recruit from those conferences, MSU. We send our
16 students from MSU, and many students take part in
17 those conferences, and we publish books and then
18 proceedings of the conferences. Very valuable
19 conferences. So that's another conference.

20 Then I take conferences myself. For
21 instance, last two years I went Switzerland in the
22 Alps there someplace that I give talks on vehos (sp)
23 and neutrality, and then 4-manifolds conferences I
24 attend. The last one was they were going to make a
25 conference to honor me. I never liked this kind of

1 thing. I'm with people. I went to conference on
2 condition that they won't honor me, but I will be
3 speaker. So I went to conferences twice two years in
4 a row in Switzerland.

5 Last year I went to a conference, and there I
6 delivered one week of mini course to the Interlogic
7 Geometry Algebraic Geometry and Algebraic Geometry
8 Group in Brazil. So I give a sequence of lectures in
9 this, but I have to tell you that all these things, I
10 been constantly penalized last five years. Every time
11 I am called. While I was doing this, I was getting
12 calls from MSU. Are you going to cancel MSU, here or
13 some other places? I said, Excuse me, I'm in the
14 middle of giving lectures, then I convince them, well,
15 at least we have a phone conference, because it's a
16 formal deposition I have to give Professor Allen
17 Barnhart (sp) at MSU in conjunction me getting
18 penalty.

19 So middle of these things, I was giving
20 lectures, I am on the phone for hours and hours
21 calling about my course in 2015, you know, like what
22 we been doing here, so this is other conference event.

23 There are many other things. I attended
24 Max Planck Institute in Germany. I went there, and I
25 gave a talk there, and I do research visit, and then

1 many conferences connected to our FRG group. For
2 instance, before giving my course 2015, the course is
3 being discussed in here. This is research course. We
4 give that course to understand new developments in
5 mathematics.

6 Prior to 2015 there was a major development
7 in mathematics. Researcher found new sequence of
8 spaces in the master fire and hires (phonetic), and
9 they are not known to exist. Those are spaces that
10 cannot be tiled, like this brick. And then we were
11 all excited, but it then was problematic, so we
12 organized our FRG group to get prepared for this
13 course.

14 So our goal was an onset course the summer
15 before, year before, and then get best of 75 to 70
16 students, send the papers and that we pay for this
17 course, and then the information, I took all these
18 five students who took this course, 996 course, to
19 New York Research Institute, Simon Centers Research
20 Institute in geometry and topology. They met for two
21 weeks to prepare to participate in the conference so
22 they could take this course on a Saturday too.

23 So this course is not just like the course
24 and then it's over, no, no. After this course, we
25 invited the person who did the major role for

1 development in his field. His name is Montereso (sp).
2 He is currently in UCLA. He is now going to Stanford.
3 We invited him to Gilmore Conference, so that our goal
4 was to some of the families who can get the students,
5 five distinguished students, go to the New York
6 conference and take this course, and then go to
7 Gilmore conference so they could understand what it is
8 in this position.

9 Q. Is it fair to say that there is a lot of conferences?

10 A. Yes.

11 Q. When you go to these conferences, do people know at
12 what institution you are doing your research?

13 A. Of course. I am known as Michigan State University.
14 I am a Spartan.

15 Q. If you could, describe what impact, if any, your
16 participation in all of these conferences would have
17 on the reputation of the math department at MSU.

18 A. Great deal. Students come. We recruit a lot of good
19 graduates all over the world. From Russia, from
20 China, from Italy, from Turkey. These are very
21 distinguished students, and they learn about the
22 mathematics. They want to come study all subjects at
23 MSU. In fact, there is recruitment faculty. In fact,
24 our faculty we hired last year, he was to several
25 conferences. He was the speaker at several

1 conferences.

2 Q. And through the years that you have been here at MSU,
3 have you had the ability to develop an understanding
4 about the interworkings of the math department?

5 A. Of course. I created geometric topology research
6 group at MSU. Before I came here there was nobody.
7 In fact, in that condition, I took the job, and they
8 gave me an opportunity. I recruited faculty. Almost
9 everybody that testified here I had handled, hired,
10 recruiting. Over the years this has changed. It
11 changed. So I know how the math department works.

12 Q. During your time here, did you have a chance to
13 familiarize yourself with the bylaws that govern the
14 math department?

15 A. Of course. Of course. They have bylaws about their
16 chair positions and diversity hiring, many things,
17 like very sensitive topics like this that should not
18 be tinkered with.

19 Q. And you testified that you saw things change at MSU
20 over the years. When did they start to change?

21 A. I think I first noticed the change, it was like almost
22 ten years ago. He had some run-in with some Middle
23 Eastern student, and he told her she is no good, she
24 should leave the program. She cannot get Ph.D., and
25 people at Harvard will kill her, because she is not at

1 that level, and she -- I remember. She came to my
2 office crying that this is what Professor Wolfson told
3 her. I told her, Never mind Professor Wolfson. Just
4 go meet those professors, because I organize
5 conferences, and you can meet these people. Tell them
6 you are interested in what they are doing.

7 That's what she did. She went to those
8 conferences. She met world-renowned mathematician in
9 the field, and she told him, I am interested in this
10 field. He said, Oh? If you are, I think it's great.
11 I invite you to come visit me at MIT. I can be your
12 outside advisor and then you can work with us here.
13 She did. She went to MIT, worked in von services, and
14 she changed very much from Wolfson to that. Wolfson
15 didn't want to advise her anyway, and then she solved
16 her Ph.D. problem. And now she has a -- she's been a
17 fantastic story. Now she is a full professor in
18 Washington, and she is one of the superiors of best
19 woman mathematician among the world. This is
20 nationwide, mission prize, or something like this.

21 So she does not -- every time she comes to
22 MSU, she is very extremely mistreated as if she did
23 something wrong. A normal person say, I was wrong
24 that now you make success. Normally congratulate you.
25 I congratulate you being successful. No, she can't

1 come here. She mistreated like this.

2 That was the first thing that happened so
3 many years past, then there was a second time I had a
4 run-in, I had a problem. I see things changing.
5 Chairs, like Promislow wanted to make the chairs.
6 Right before the chair -- chairs, they have rules,
7 because I consult with chairs. We have so many
8 discussions, and finally we made the rules.

9 Rule number one, we don't immediately secure
10 chairs. We wait about six months of vetting process.
11 There should be at least three public meetings that
12 people talk to candidate. There should be at least
13 three candidates in the chair elections. You
14 shouldn't just put one person with the chair.

15 And then the professors, that chair election,
16 Jim Kirkpatrick just announced that he is going to
17 have chairs, and one final candidate, which is
18 Wolfson. I mean, we were appalled. We were appalled.
19 We told people, You cannot do a one-person chair
20 election. You have to wait six months. You need to
21 discuss it. We cannot have a chair election with one
22 person.

23 Nevertheless, he forced chair election, and
24 then with one candidate, and he lost the chair
25 election. One person ran for chair election. He

1 lost. So he was angry. And one of the things I did,
2 because I feel very protective of this university,
3 because I serve the university 37 years, I get feeling
4 angry people playing with this university. I think
5 rules should be rules. The university should run,
6 should be run ethically, ethical principles.

7 And then one of the things I did was, right
8 before Wolfson's election, I did a survey. Didn't
9 have a survey company. Did a few survey companies,
10 and the survey company sent questionnaire to all
11 departments, Who is the person that you want as chair?
12 Who is person you do not want as chair? Wolfson was
13 by far in the second category. His negative was sky
14 high. I can produce such document. After that, the
15 chair, he lost the chair.

16 Okay. Then we talk about we are relieved not
17 normal chair election. Week after or maybe two week
18 after that, after that the head of the election
19 committee, he resigned. He was just embarrassed. And
20 then he was chair. Promislow was in this position.
21 He was elected the chair of the chair election
22 committee, but almost one week later it was announced
23 that Promislow is running for a chair. You cannot be
24 the chair of a chair election committee and then have
25 yourself be nominated for the chair. I mean, you are

1 supposed to go find best candidates, including the
2 outside candidates. So all of a sudden Wolfson -- I
3 mean Promislow running for chair.

4 By now I was so exhausted. I had to go to
5 conferences. I didn't pursue this, but, again, if I
6 remember, Promislow come into my office in a good feel
7 visit. He is telling me -- he told me that he would
8 now be the candidate. Even though I was very
9 disappointed, I didn't want to offend him, and that he
10 brought a folder showing me that he is really worthy
11 of this job.

12 Even the first office I realize, you know, he
13 can lie. You know how? Because I made that again,
14 like an independent survey company surveyed our
15 department. The way you reply to survey, as soon as
16 you reply, you get a bar graph. It's like Vegas,
17 voting on the survey, bar graphs. And he came to my
18 office. He said, I commend you. It was a good idea.
19 You did good.

20 By the way, this is the thing they were
21 criticizing, asking if survey company, survey opinion.
22 And then Promislow said, yeah, I commend you. It's
23 good idea, and I did want to do survey. Why do you
24 in? What is wrong with your survey? I knew that was
25 a lie because as soon as you vote, then it shows you,

1 bar graph shows you. I was a little crushed when I
2 heard that. I thought that I really in the beginning
3 I think there is something wrong with this candidate.

4 So then I left country. I went to bunch of
5 conferences. And that was the second candidate, but
6 they couldn't find a third candidate. Nevertheless,
7 they had the chair election and the dean was picking
8 him up. Normally he should not do that. He probably
9 should not do that, his position in university,
10 because we have bylaws, and he is forcing us to
11 violate our bylaws.

12 Then I heard that Promislow won the election.
13 Okay then. Okay, so what can I do? I came and I
14 talked to him, but then all of a sudden I realize he
15 fired all the people in there, like bunch of other
16 offices. He put Wolfson in all of the top office. He
17 put Wolfson in the head of graduate office and advisor
18 from the area. I mean, it look like now Wolfson is
19 the chair leader. It is like a graduate to dean.
20 After going through all this, all of a sudden we see
21 Wolfson head of every department, and he put that in.

22 We felt like he was playing favorite. And I
23 remember, I made a visit to his office. I explained
24 to him my dismay that they are, given the past
25 performance of Wolfson, that he is doing it in spite

1 of -- before the investigation that he is
2 discriminating students. This investigation started
3 that fall. I didn't know.

4 So then he is up. After I told him, I mean,
5 don't do it, don't do it, and then he put Wolfson in
6 that position, and the following six month, a year,
7 Wolfson did all those things in OIE report. And he
8 was warned don't do that. Every time I do this, you
9 know, I get negative mark. Selman's destroying
10 department workings. But I know in my heart I am
11 doing something good for my department, my university.
12 I thought this university here good university. I
13 recruit them to this university.

14 Q. So is it your testimony that you warned Professor
15 Promislow about how Keith -- or I'm sorry, Jon Wolfson
16 was treating grad students?

17 A. Yeah, I knew that very well. I told him it's the
18 wrong decision, and then Abbas, he is well-known, and
19 he was really liked person, he is really personable
20 person, especially with foreign students coming here.
21 They need some holding hands, and then he is giving
22 them support. Abbas was really, good, but there are
23 all kinds of problems that normal person don't know.

24 Q. If you know, what was Abbas' ethnicity?

25 A. Palestinian.

1 Q. Palestinian. Was Abbas the graduate studies chair
2 when he promised Olga Ahgat(sp)?

3 A. Yes. I asked him to be chair candidate. He said,
4 previously to that election, he said he is very
5 comfortable with office. He really would like to work
6 and help the students in service. That's what he told
7 me.

8 This is the beginning of the problem. Then I
9 get my course cancellation started with Wolfson.
10 After these things happened, he took the chair and
11 then in the course assignment for the spring and the
12 fall, you know the rest of the story.

13 So I also, I also feel that Dean Kirkpatrick
14 doesn't like me, because I challenged him about this
15 election, because I told him he shouldn't do that. I
16 also challenged him about diversity hiring. I said
17 many human rights, because I really like doing this
18 job, and I was a chair on the Human Rights Committee a
19 couple of years, and I am really sensitive about.

20 Then I saw, they announce diversity. It's
21 really important for me, because I know we were
22 getting bad deals, because minorities, the way they
23 handled it is they just diverse -- they turn abusive.
24 They just hire minority. They said, Our problem is
25 solved. They do not seek the best minority for the

1 job. That's why we created diverse position. Diverse
2 position, you announce the position. We are looking
3 for the best minority, best one. They apply for this
4 position, and then you collect all the candidates, and
5 you make a commitment. You vet them, and then you be
6 the judge, okay.

7 So in one year we did this. We were all
8 excited. I read through the files. There were really
9 strong candidates to the time, and then three days
10 before our hiring procedures are beginning, Dean
11 Kirkpatrick sat there and said that they are not going
12 to do this. He is going to give position to Papara's,
13 some secretary in our labor department.

14 I don't want to talk her down, but this is
15 not appropriate. I told dean, this is highly
16 inappropriate, and he said, Papara's strong. She
17 won't get a position here, get a faculty position.
18 Papara's has validity in her position here, so she
19 could compete for the position. If she doesn't get
20 this year, maybe she can get next year, but please
21 don't do this. Don't just announce a job position,
22 cancel it, and then give to somebody's spouse. I
23 don't like it. I think that's not ideal in our labor
24 department.

25 Again I was writing emails to Kirkpatrick

1 about this chair election. I know people tell me
2 Kirkpatrick hates you. I never met him till many
3 years later. Many times his course cancellation I try
4 to reach him. Normally when we have a problem with
5 chair, we go to the dean. The dean open the doors. I
6 did this in the past all the time. We had Dean
7 Pastel (sp). She was most wonderful dean. I need
8 legal forms and we needed to publish books and this
9 sort of things, she always open the door, you go talk
10 to her.

11 In this course cancellation, I asked
12 countless number of emails to Kirkpatrick, he does not
13 reply, and yet he tells me, no, don't even try. With
14 Kirkpatrick. What kind of system is this? Then I'm
15 sent to Terry Curry's office. He tells me, Don't even
16 go there, because he is the one who wrote the penalty.
17 What kind of thing is this?

18 Q. Professor, let me bring you back to what you were
19 testifying about a second ago. You testified so far
20 about what you feel the changes are in the math
21 department, and you made various examples of what you
22 think, and I am not going to characterize them. You
23 made very specific examples of what you think those
24 changes were.

25 Do you think the changes were -- how do you

1 characterize the changes in the math department, as
2 being better for the math department, keeping it the
3 same, making it worse?

4 A. Terrible, because now we are run by favoritism, and
5 the chair now, the way he runs it, that he surrounds
6 himself with same eight, nine people. Most of them
7 testify here against me. They just do that.

8 Eylem is committed. Sometimes it's a couple
9 committed, and they just run the university, and
10 sometimes you can get to his sympathy, but have to be
11 good side of him. He does not allow criticism. He
12 express in here -- I was shocked. I couldn't believe
13 my ears, because he decides what is appropriate to
14 say, what's free speech. He does not understand what
15 free speech is. I can tell you some things about how
16 we form this communication device listening our
17 department. I know history too.

18 Q. We will get there in a second. You characterized
19 several examples of when you spoke up about things
20 that you thought were going wrong in the math
21 department. I am not going to characterize them for
22 you. I feel like you did a good job.

23 How do you feel like you were treated after
24 you spoke up about these goings-on?

25 A. I was treated very badly. I was shunned, and people

1 just were talking behind me. I mean, we are
2 professors. Professor means person who profess for
3 goodness, for ethics of society around it. If I see
4 something not up and up, of course I need -- it's my
5 responsibility. I want my university to be good
6 university, choosing best possible people.

7 Q. Was it your intent when speaking about the emails to
8 target a single person?

9 A. I think that you read huge number of them. Every one
10 is written politely, very courteous way. Why do I
11 know this? Because I was in the beginning of this
12 internet usage here. I got made an order of this
13 list, and we make some FAQs for this to tell people
14 how to use these things, and in the beginning there
15 were a lot of fights, and I run -- some of them for
16 grad students and foreign students. I was
17 instrumental in putting effectively this in.

18 The purpose of involving people, departments
19 deepens, because before we learned there were
20 complaints from people, I am not going to get involved
21 in department, in workings, in hiring, so we made
22 hiring server, department server, grad server, so
23 people get involved, and college people. We said,
24 Please express your opinions so that you will have a
25 healthy department.

1 That's how we started. Went from this, we
2 came to this. Every time you say, you make a polite
3 request, you are a trouble maker. You are just
4 offending us, you are bullying us. This what happens
5 in our department.

6 Q. Did you intend to bully anybody?

7 A. I mean, you send -- you see letters in the files. You
8 seen it. You went through it. If I say, Please,
9 could you pay attention to this, please, could you
10 correct this, they not reply to this.

11 I was shocked to hear yesterday that they
12 assign somebody to assist my emails with me and my
13 secretary assign to run, to help me run my NSF grants.
14 This is atrocious, because I did these grants as P.I.
15 Legally, I have -- I can't get these people come in
16 assist. You know, put me in difficult position. Then
17 I promise to that visitor from here and that visitor,
18 other visitor give a talk, that graduate student, I am
19 responsible for that, and the dean, when I am sending
20 these emails, my secretary, financial secretary, he
21 is, unbeknownst to me, he order, he assign someone to
22 intercept these emails because, Selman, you know, it
23 hurts people's feelings. I mean, this is crazy. I
24 did notice.

25 Q. Did you have difficulty in getting things paid that

1 you had requested to get paid?

2 A. All the time. It was hell. Just imagine 2015. Is
3 year Google, there is a Google page that tells you all
4 your citations, whatever. If you look at the draft
5 2015, mine way up, because I had three full grants.
6 Hundreds of thousand dollars was my personal grants,
7 and I am there prevented, in that year 2015, and the
8 chair tells me there is nothing, \$600. They are
9 cancelling this course.

10 Q. What about outside of 2015? After 2015, did you make
11 any requests for money to be paid from your grants,
12 and did you notice any difficulty?

13 A. I mean, like this Iranian -- he wasn't my visitor, by
14 the way. He was somebody spending sabbatical. It's
15 just a little practice. He goes to university that he
16 feels he can benefit from there. He was at
17 Massachusetts University, graduated. His field was in
18 topology. He felt he could talk to some of the people
19 here and me, so he came. He wanted to come, but he
20 couldn't come, whatever.

21 But Professor Promislow is always in a hurry.
22 He is sending him email to this person, you will pay
23 this, you won't pay. He should not do that. He
24 should not have contested my communications with my
25 visitors. I brought people to him. Then I warn

1 Tigasis (sp), and then he just play games, and this
2 for him, he will pay, and he will let him teach a
3 course but won't -- I did some. Okay. That he will
4 give some teaching. Sometimes you are on sabbatical,
5 you get to teach a course to get an extra, even though
6 he is supported from his government, then you teach a
7 course, then you get money for the family.

8 So he said he will do that. Then he comes
9 closer to his day to arrive, oh, I don't like his
10 English, that he has a problem, so I am not giving.
11 So these are examples.

12 Q. Professor Akbulut, you, me, and about five other
13 people in this room have a very rapid-fire way that
14 we -- how we speak.

15 A. I slow.

16 Q. And it's very difficult for the panel --

17 A. I will speak slowly. So that was the case with the
18 Iranian mathematician. I had lot of difficulty, and I
19 instruct, when I realize that Promislow -- I never try
20 disseminate years in my life. I have only secretarial
21 staff of chairs. They never touch these things.
22 Having the grant is an honor for our university. It's
23 a good thing for our university. Usually they match
24 these grants. If you get 5,000, they give another.
25 They make it 10. They help you, because you're the

1 name on the university. This whole visit, you want
2 talk with? No, you cannot do that.

3 And the one day I went to our Ms. Wemple, our
4 financial secretary. If Promislow ever comes to your
5 office and tries to make a payment on behalf of me or
6 my grant, inform me, because we can go to jail for
7 this. NSF doesn't like this, because if I get caught
8 doing that -- I am supposed to -- I am not allowed to
9 tell like Ms. Wemple do it or Promislow. I am the
10 P.I. So she said, Okay, Professor Akbulut, I can
11 comply.

12 Not long after that I get a phone call from
13 her. Promislow came to my office, asked me to pay
14 \$5,000 to your visitors, or something. I went
15 immediately -- I had visitor out there. I went his
16 office. I said, You know, Professor Asadi, did you
17 ask that department to pay for the insurance? He
18 said, No, no. He said, My insurance receipts. He
19 pulled out. He showed me insurance. I paid my
20 insurance. Okay. Come with me.

21 We went to Wemple's office. I showed her,
22 these are the receipts, and then Ms. Wemple said, Oh,
23 I'm sorry, Professor, so I will change this so it's
24 corrected, okay. Then I told Ms. Wemple, not long
25 after this, I am going to ask email asking if he knew

1 did Asadi pay for his insurance, and you going to
2 answer to me just like you answered to me right now,
3 that he did pay for his own insurance. Then I went
4 upstairs, send an email, because by that time I am not
5 trusting our chair anymore, because he keeps changing
6 his rules.

7 Q. I am going to stop you there, and I am going to ask
8 you to identify a document for me, please. It is the
9 contents of Tab A. I am just going to, I am just
10 going to take the first page of Tab A.

11 MR. REIFENBERG: Not the extended insurance
12 coverage?

13 MS. DOUKOURE: No.

14 DR. PROMISLOW: Got 35 written on it?

15 MS. DOUKOURE: That's correct.

16 JUDGE WHITBECK: Off the record.

17 (Off the record 1:32 p.m. - 1:33 p.m.)

18 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
19 this document?

20 A. Yes, I do.

21 Q. What is contained in this document?

22 A. This document is my email to Carolyn, because I had to
23 talk with her. I am going to send you such an email
24 for my protection that you are going to answer
25 truthfully. So I sent her an email saying, Could you

1 please verify the validity of the following? The
2 visitor Professor Mohammad Asadi did cover his health
3 insurance himself. He presented his credit card
4 receipts showing that he did this. At no time neither
5 Professor Asadi nor Professor Akbulut asked his health
6 insurance to be covered (or what he had paid for his
7 health insurance to be compensated) by the math
8 department.

9 Q. Does that document also contain a response?

10 A. Yeah, there is a response right after.

11 Q. You don't have to read the response, but what was her
12 response in general?

13 A. The response was, This is correct. Professor Asadi
14 paid his health insurance, and she gives the amount.
15 This is very important, because usually financial
16 secretaries are very, very cautious, very careful to
17 present the written document, because they know how
18 serious it is to make any mistakes in financial.

19 MS. DOUKOURE: At this time I am going to
20 move that it be admitted as, I believe, FM-3.

21 DR. PROMISLOW: No objection.

22 MARKED FOR IDENTIFICATION

23 FACULTY MEMBER EXHIBIT 3

24 1:35 p.m.

25 Q. (BY MS. DOUKOURE) Professor Akbulut, following this

1 email exchange with Carolyn Wemple regarding
2 Mr. Asadi's health insurance, was there any further
3 discourse or discussion in the math department
4 regarding Mr. Asadi and his health insurance payment?

5 A. Yes. During that time I am trying to correct what
6 Chairman Keith Promislow was doing in my teaching. Am
7 I going to go to different sources. Are we going to
8 take it to the dean's office? Are we going to take it
9 to the Faculty Grievance Office, FGO, on campus? So I
10 went there. They told me, Oh, okay, we'll have a
11 hearing.

12 Q. I am talking specifically about this specific issue
13 with Asadi's health insurance money.

14 A. That was department meeting, open meeting, and then
15 Chair Promislow, right in front of everybody -- in
16 that meeting I was asking my colleagues' support that
17 the claims about my teaching, and then he got up and
18 said, Well, I penalize him 10,000 for not teaching,
19 5,000 for his visitor's issues. I say, Excuse me.
20 They all hush me up, because you come to our daily
21 department meeting, it used to be we used to have a
22 quorum. People used to listen to you. After he
23 became the chair, Vladimir and Henshman, they are
24 yelling and yelling and yelling, talking over you.
25 All of a sudden then nobody listening to you, and that

1 was it. That was it.

2 Q. Ultimately, after Professor Promislow said he paid
3 \$5,000 for Mr. Asadi's health insurance, did you find
4 out whether that was true or not?

5 A. I know it is not true, because I was there. Carolyn
6 explained it to me. Then I read OEI investigation,
7 which was the attorney was fired because of me because
8 he wanted to go to OC -- education department --

9 COURT REPORTER: Go to the education
10 department?

11 A. OC -- Keith Fintushel from?

12 Q. Constantine. OCR.

13 A. OCR.

14 Q. So ultimately --

15 A. Event is closed. This discussion appearing OIE report
16 to --

17 Q. Professor Akbulut, you are not testifying to her.
18 Sorry.

19 MS. DOUKOURE: Could we go off the record for
20 a second.

21 MR. REIFENBERG: Sure.

22 (Off the record 1:38 p.m. - 1:42 p.m.)

23 Q. (BY MS. DOUKOURE) So we left off talking about
24 Mr. Asadi?

25 A. Yes. But you asked me if you have had any

1 conversation in any place this came up, this insurance
2 issue about Asadi. Department meeting was one. OIE
3 report is another one, because I also read OIE report.
4 That Promislow told the attorney, OIE attorney, he
5 paid \$10,000 from such-and-such a department fund for
6 insurance payments for Asadi so he could take a visa.
7 By all accounts, this is wrong.

8 Q. So with regards to that OIE report that you read that
9 stated Professor Promislow --

10 MR. REIFENBERG: The OIE?.

11 MS. DOUKOURE: OIE report.

12 MR. SMITH: Which one?

13 MS. DOUKOURE: That's what I am asking so he
14 can clarify.

15 Q. (BY MS. DOUKOURE) Which OIE report are you now
16 talking about?

17 A. So I made the complaint about Professor Promislow,
18 Professor Wolfson, and Dean Kirkpatrick, and they had
19 investigation about this. It's one of the pages of
20 the interim report. They never -- final report. So
21 then end I understand the attorney was fired, and I
22 was told to go to EOC because you cannot prove all
23 these things because you are Turkish and you are a
24 Muslim. University doesn't have means to adjudicate.
25 You call the EOC. I was really much heartbroken,

1 because I didn't get a correction from Professor
2 Higgin, but I have a copy of it. It clearly shows
3 Professor Promislow paid \$5,000 from some department
4 funds so that his visitor could come to United States
5 to get a -- for the insurance. I mean, I was just
6 shocked that I saw this. It was all wrong.

7 Q. Professor Promislow, I am going to give you another
8 document to identify. I am sorry. My bad. I keep
9 reading and talking at the same time, and apparently
10 walking and chewing gum is difficult for me. I
11 apologize.

12 DR. PROMISLOW: You fooled me.

13 JUDGE WHITBECK: Just for clarification, the
14 reference that you made to an OIE report, is that the
15 report dated October 23rd, 2015?

16 THE WITNESS: She has that.

17 MS. DOUKOURE: You can answer, but that's as
18 best that we know.

19 THE WITNESS: It's not in front of me.

20 JUDGE WHITBECK: So, no, so we are talking
21 about a different report?

22 MS. DOUKOURE: Yes.

23 THE WITNESS: I can show you my folder.

24 JUDGE WHITBECK: It's not up to me. It's up
25 to you and her.

1 Q. (BY MS. DOUKOURE) It's behind Tab F. It's the last
2 few pages of Tab F. They are marked 34A and 34B. F
3 as in Frank.

4 MR. REIFENBERG: 34?

5 MR. SMITH: 34A and B.

6 MS. DOUKOURE: It's the last two pages, the
7 very final two pages.

8 MR. REIFENBERG: This is more that is
9 confidential?

10 MS. DOUKOURE: It is.

11 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
12 the document?

13 A. Yes, I do. I was appalled when I saw this.

14 Q. Can you identify what this document is?

15 A. Well, this document is a response of Promislow, my
16 accusations, that attorney get this. I don't know
17 what it's call. Deposition?

18 Q. What is this?

19 A. This is his response.

20 Q. Were these two pages of this document part of a larger
21 document? Were these two pages part of a larger
22 document?

23 A. Yes, part of a larger document.

24 MR. REIFENBERG: I want to make sure that we
25 understand the same procedure with respect to marking

1 out.

2 MS. DOUKOURE: Yes, and I am going to ask
3 that we don't do that in our exhibit, because we
4 didn't do it with other exhibits.

5 MR. REIFENBERG: All right.

6 DR. PROMISLOW: You didn't mark everything?

7 MS. DOUKOURE: No, she did.

8 MS. YERMAK: That's how I understood what you
9 said. Was not, okay.

10 MS. DOUKOURE: What I am saying is every time
11 you entered a document it had extraneous information,
12 and you didn't stop the whole proceeding and ask that
13 it be marked, so I am going to ask that we don't do
14 that. I am going to state it under everything, yes.

15 MR. REIFENBERG: Okay.

16 MS. DOUKOURE: Without a question.

17 Q. (BY MS. DOUKOURE) Do you know why -- what the context
18 or why the document was created? Do you know what
19 that is?

20 A. Yeah, this document, you know, it's extension of the
21 way he handled the 996 course. Part of my complaint
22 was about that, so he was saying things to justify,
23 justify it. Just like the witnesses. Something about
24 that the course wasn't, you know, time, whatever, but
25 grant was encumbered, and all the progress about my

1 grant was encumbered, and then the justification why
2 my grant was encumbered and why I was penalized
3 \$15,000. He was saying 10,000 for the course, not
4 teaching, 5,000 for he is paying for this visitor's
5 insurance so he could come to this country for his
6 visa, and then there was many lies.

7 Q. Does this document reference the \$5,000 that was paid
8 for Professor Asadi?

9 A. Response was that Mr. Asadi needed additional
10 financial assistance for health insurance, which was
11 required of his visa. We get visa before the
12 consulate.

13 Promislow said he provided \$5,000 out of the
14 Department's Michigan Center for Industrial and
15 Applied Mathematics funding for Mr. Asadi's health
16 insurance coverage so that his visa would not be
17 revoked.

18 Q. So --

19 A. In here, there is a contradiction in here. Half of it
20 says to get the visa, but it is not what would be
21 visa.

22 Q. So this -- what do you understand Professor Promislow
23 told the investigation investigate for based on what's
24 written in this report?

25 A. Well, I mean, Professor Promislow was trying to

1 maximize my pay amount, maximize my pain, so he
2 created, you know, a fantasy to increase to \$15,000.
3 I mean, 15 is 10 percent of my salary. He does
4 another 10. 10,000 is my -- he says it openly, my
5 penalty was 10,00 and 5,000 for insurance. He used
6 completely fantasy.

7 Q. Were you here when Professor Promislow testified?

8 A. Yeah, I was here.

9 Q. Did you hear him explain what he actually paid with
10 that \$5,000?

11 A. He said he paid for his, you know, the housing,
12 something like that.

13 Q. He said for the housing?

14 A. Yeah. He is free to give money away. I started
15 recording the very beginning, because I knew he is
16 capable of lying serious way, and one of the things I
17 remember very well is that he was telling me that he
18 is going to give \$5,000 to visitors, but I told him,
19 Like you get me in trouble? Before, you know, you do
20 whatever you do, it's your own. It's not have to do
21 with me.

22 Q. If you know, based on your own knowledge, how many
23 times did Professor Promislow repeat the lie that he
24 had given Asadi \$5,000 for his health insurance?

25 A. He said that the biggest fund was the general

1 department.

2 Q. I said how many times.

3 A. Many times, many times. I mean, here, he admitted
4 here.

5 Q. Did you take the OIE investigation seriously?

6 A. I took it very seriously. I went religiously every
7 time they called me till the last visit, and last
8 visit I was supposed to write a response to these. So
9 I write out intended lies, wrong, wrong, lies, and I
10 went to all the office, and this day it was
11 terminated. It's terminated.

12 Q. Do you feel that people who are being investigated
13 should lie to the investigators?

14 A. No, they should not lie. There should be consequence.
15 We are talking about state university. We are run
16 with the taxpayers' money, and with tuitions and our
17 grants, federal grants. People shouldn't do this.

18 Q. Were there any consequences that you know of for
19 Professor Promislow lying in an OIE update?

20 A. None.

21 Q. If we want to break now, that would be a good time.
22 Actually I am going to move to admit this.

23 DR. PROMISLOW: I have an objection. It's
24 exactly the larger document fee that doesn't make
25 findings of conduct.

1 MS. DOUKOURE: We are not into the findings.
2 We are not -- we are admitting it for that statement.
3 Charging party, sorry.

4 MR. REIFENBERG: You are admitting it for
5 this being a record of testimony before the OIE?

6 MS. DOUKOURE: Yes, and he testified, he
7 authenticated the document. Charging Party has placed
8 in evidence lots of documents that are part of a
9 larger record, and we are offering this document --
10 first of all, the Rules of Evidence don't apply, and
11 let's start with that, because evidence is negotiable
12 the entire time. Rules of Evidence do not apply.

13 Second of all, we are offering this for the
14 statement of the OIE, Professor Promislow's statement.
15 We are not offering it for any larger context. We
16 didn't author the findings of this investigation, and
17 my client has been able to properly identify the
18 document.

19 MR. REIFENBERG: Do you have objections to
20 this being admitted with respect to -- not with
21 respect to the conclusion, but with respect to this
22 being a record by the OIE of the testimony?

23 DR. PROMISLOW: No objection.

24 MS. DOUKOURE: This will be marked, I am
25 assuming, FM-4.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MARKED FOR IDENTIFICATION

FACULTY MEMBER EXHIBIT 4

1:53 p.m.

(Break taken 1:53 p.m. - 2:03 p.m.)

MR. REIFENBERG: Ready?

Q. (BY MS. DOUKOURE) Professor Akbulut, do you know on what basis Professor Promislow was alleging your NSF grants were fully encumbered?

A. The basis that some crazy story that he created. I can tell you the whole story from beginning. You can have five, \$6,000 to keep them in the cart. My grants were encumbered, cannot pay. That's why they didn't let Luke in the course.

Q. Do you know how he got the information your grants were fully encumbered?

A. I have no idea, because I am the only one who gets the time sheet of this grant. He is just going on by hearsay or something, something. That's why I told Carolyn, without my permission, you are not going to give this kind of information, and every time he tries to ask you something, you come to me. This is when I got a statement from her. I asked her again, send me a letter that it showed, and the one before. That I told Carolyn I am going to send you email. You are going to answer me truthfully.

1 I send her an email, Carolyn, do you know day
2 before the deadline I came to your office and I asked
3 you if there is enough money for Luke to enter this
4 class? Answer me, please. She replied, Yes, your
5 grants were not encumbered, and you can have money to
6 pay for Luke. I mean, I repeated it.

7 So, I mean, we are talking about like three,
8 four grants, hundreds of thousands of dollars. I
9 mean, I have no idea why he is going to make deals,
10 big deal about this, you know, if you are paying for a
11 few credits for this course.

12 Q. I am going to hand, I am going to hand you another
13 document. It is behind Tab F. It is labeled as 15.

14 MR. REIFENBERG: 16.

15 MS. DOUKOURE: 16.

16 Q. (BY MS. DOUKOURE) Professor Akbulut, have you read
17 that document?

18 A. Yes, I do.

19 Q. What is this document?

20 A. This document is two emails. One is from Luke, and
21 Luke is telling me -- this is dated October 14, 2014.
22 I just e-mailed Britta, who is Wolfson's secretary,
23 about an override for this course. Hopefully they
24 will get the numbers fixed. So this document shows
25 that October 14 he grant for override, and ever since

1 that date they are not letting him in. He has been to
2 my office four, five, six times coming constantly
3 complaining they are not letting him in the course. I
4 keep telling him, Don't worry. We have hundreds of
5 thousands of dollars. It has nothing to do with
6 money.

7 I ran immediately Carolyn. I told Carolyn,
8 Whatever they want, please pay. She said, No problem,
9 Professor. This is before the deadline. This is
10 another issue about this money. I've been in this
11 University for 37 years. Graduate students can sit
12 any class they want. If you want to get credit, then
13 you pay for it.

14 In this case, Luke didn't need any credits.
15 To get certain degree you had to do certain
16 requirements, but he is very beyond it. He is writing
17 his thesis, so he is just symbolically, because if he
18 is just sitting in this class, okay, he wanted to pay
19 for one credit. Wolfson was telling him, no, no, no,
20 no, and then you run in, Ivanka didn't pay for college
21 or for scholarship or fellowship. The others should
22 pay, and his answer, Encumbered. This is a complete
23 joke.

24 Q. Do you know whether or not other grad students were
25 allowed to take these types of courses?

1 A. Of course, I been here 37 years. I know.

2 Q. Let me ask you a question. Just so we know that we
3 are talking about the same thing.

4 Do you know whether or not other graduate
5 students were allowed to take this type of course for
6 one credit?

7 A. All the time. One credit, noncredit, two credit. If
8 they need credit, they have to pay for it, but Luke
9 didn't need any.

10 Q. I am going to move at the time to have this admitted
11 as FM-5.

12 DR. PROMISLOW: No objection.

13 MARKED FOR IDENTIFICATION

14 FACULTY MEMBER EXHIBIT 5

15 2:10 p.m.

16 MS. DOUKOURE: I am going to hand Professor
17 Akbulut what's labeled as document 17 under Tab F.

18 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
19 this document?

20 A. Yes, I do.

21 Q. Without reading the entirety of the document into the
22 record, can you please describe this document for us?

23 A. Well, I mean, Luke was being prevented taking this
24 class. In fact, I have a document previously from
25 Wolfson saying the dissertation completion fellowship,

1 completion fellowship, you cannot take this course,
2 flat out. I know it's all wrong.

3 But now, while I was fighting to get Luke
4 accepted into the course, I was having meetings with
5 the chair, and the chair just playing with me. He
6 come in my office talking hours and hours and hours
7 and hours, and I told Keith, Well, you know, I have
8 been here 37 years -- or at that time 30 years. I
9 never heard this kind of thing. Students are students
10 can sit in class. He said, Professor Akbulut. He
11 called me Selman. Selman, no, no, it's not for grad
12 students. It's through the college rule for chemistry
13 or biology students, because they use their credits
14 for many, many hours of lab work, so there is a
15 potential abuse they can do. It's for them. It
16 doesn't apply to mathematicians, so don't worry about
17 this rule. I was surprised why such a person can be
18 given a fellowship for being successful and then
19 prevented taking a class. That what matters to me.

20 So then afterwards, then he said -- well, I
21 said, How about grants? I mean, by the way, I saying
22 this my heart, because I recorded these things. I
23 always go and listen. I told Keith, How about grants?
24 He said, Don't worry. I will figure it out. There is
25 no insurance.

1 But Luke was getting tired. But, Keith, Luke
2 is here this October, whatever, '14. He said, exact
3 words, Why didn't he register the course in September?
4 I knew that he was joking with me. Then he just left,
5 and then my office laughing, you know, we will see
6 about this. I need to talk with Dean Kirkpatrick. We
7 will give you our decision.

8 Then soon after that, he send an email, We
9 decided against. I told him, What can I do? Well, he
10 said, you can go to Ombudsman to dispute this. I
11 said, It is not worth to go to Ombudsman?

12 Should I continue telling this story?

13 Q. You answered the question.

14 MS. DOUKOURE: I am moving to admit this as
15 LM-6.

16 DR. PROMISLOW: No objection.

17 MS. DOUKOURE: I said LM. I meant FM. I
18 don't know why I keep saying L.

19 MARKED FOR IDENTIFICATION

20 FACULTY MEMBER EXHIBIT 6

21 2:14 p.m.

22 Q. (BY MS. DOUKOURE) I am going to hand you what is
23 behind Tab F, document number 25.

24 Professor Akbulut, do you recognize this
25 document?

1 A. Yes, I do.

2 Q. Can you please describe the contents without reading
3 it into the record.

4 A. Carolyn Wemple, Anne Ginther pay for Luke's being
5 assistant for fall. I said, Of course. He is a great
6 student, 10,000.

7 Q. Can you please tell me what the date of the document
8 is?

9 A. August 15, 2014.

10 Q. Was August 15, 2014 before the deadline?

11 A. Of course. This is another document Carolyn -- okay.

12 MS. DOUKOURE: I am going to ask that this be
13 admitted as FM-6. FM-7.

14 DR. PROMISLOW: Have you established the
15 relevance yet? More discussion.

16 MS. DOUKOURE: You may have.

17 MR. REIFENBERG: Are you objecting?

18 DR. PROMISLOW: Just want to understand the
19 context of the document.

20 Q. (BY MS. DOUKOURE) Does this tend to show, Professor
21 Akbulut, that you were trying to cover the grant that
22 the student, Luke, had long before the deadline?

23 A. Well, of course. She's asking me, Will you support
24 Luke Williams' with 1/4-time research assistance. I
25 have been supporting all along. I have been flying to

1 New York for a conference in August, then Carolyn
2 asking me pay another \$2,700 just in case he needs to
3 for credits for his dissertation completion. Then
4 after that I also say, yes, go ahead, pay whatever
5 they deserve.

6 MS. DOUKOURE: I move that this be admitted.

7 DR. PROMISLOW: No objection.

8 MARKED FOR IDENTIFICATION

9 FACULTY MEMBER EXHIBIT 7

10 MS. DOUKOURE: I am going to hand Professor
11 Akbulut what's behind Tab F. It's marked as document
12 number 13, 13.

13 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
14 the document?

15 A. Yes, I do.

16 Q. What is the date of the document?

17 A. October 21st.

18 Q. Which year?

19 A. 2014.

20 Q. Without reading it into the record, what are the
21 contents of the document?

22 A. I am basically saying, Carolyn, they are preventing my
23 students to taking this class. I think university
24 look invade an honor student because he couldn't pay a
25 few hundred dollars registration fee or whatever. I

1 mean, it's all that time I have been telling him, go
2 ahead and use the money, right? You can use my money.
3 Carolyn, yes, I can use that money. I don't know what
4 else I can do. The deadline is 21st of October. What
5 more can I do? It's like a nightmare. How many times
6 you do it, you know, the deadline. You know, they are
7 doing something wrong to prevent even paying, being
8 able to pay more than whatever they ask for. It's not
9 enough, it's still not enough. I mean, I am telling
10 Carolyn -- should I read this a few lines?

11 Q. If you could read the first two sentences.

12 A. Remember I had asked you redirect my remaining NSF
13 grant money to help my grad students Luke and Wei.
14 Today I hear Jon's office prevent my student Luke to
15 register to my 996 class because he could not pay a
16 few hundred dollars registration fee, and so my class
17 is cancelled because it has only four registered
18 students (requirement five). If I cannot spend my
19 grant money to a Ph.D. student, who can I spend it
20 for?

21 Q. When this email mentions the GS office, what office
22 are you talking about?

23 A. Graduate Student Office. The chair is Wolfson. He
24 works together with the chair --

25 MS. DOUKOURE: I move to admit this as

1 document FM-8?

2 DR. PROMISLOW: No objection.

3 MARKED FOR IDENTIFICATION

4 FACULTY MEMBER EXHIBIT 8

5 2:21 p.m.

6 Q. (BY MS. DOUKOURE) Professor Akbulut, up until this
7 time, the date of this email, had you been provided
8 with any specific information regarding your grant
9 that would have told you that they were fully covered?

10 A. None. Now, they keep referring to some conversation
11 or some email exchange with Carolyn Wemple. Remember,
12 at the time I am assuming grants. I had three or four
13 grants, hundreds of thousands of dollars to spend, and
14 Carolyn told me, Professor Akbulut, what will you need
15 to finish this class, because she is telling me how
16 many years I have to finish this grant. I remember,
17 it by email or by word, you can use it for visitors.
18 Asadi come, and you can use it for Japanese visitors,
19 you can use for them.

20 Apparently, they treat it like the need an
21 encumbrance in all my grants. After I did that, I
22 sent that an email to Carolyn -- that email, by the
23 way, 2013. They using it an encumbered record. No, I
24 am just replying, Carolyn, what do I do with this
25 money if I cannot finish it? In fact, I couldn't

1 finish it. This money, I had like, I had to spend
2 \$15,000 from October '14 to August to finish the term,
3 so I gave 8,000 graduate student, 5,000 Asadi for his
4 housing, and then I had few thousand dollars myself.
5 I had conference in California and pay myself for
6 summer activities. It's crazy that they announce
7 grant encumbered. I am able to spend \$15,000
8 afterwards.

9 Q. I am going to hand you another document. It is the
10 same tab. It's marked as document Number 24.

11 Professor Akbulut, do you recognize the
12 email?

13 A. Yes, I do.

14 Q. Can you tell me the date of this email?

15 A. August 18, 2014.

16 Q. What is the contents of this email?

17 A. Well, Carolyn telling me that my student, Luke, is
18 getting dissertation completion fellowship, which is a
19 very good thing to give to successful student, okay,
20 and there are some rules that they can use so much
21 profit for course credit.

22 Luke didn't need any course credits, but just
23 in case, should I reserve \$2,700 for Luke from grant,
24 just in case the money requirement arises. I said,
25 Well, of course, give it to him, \$2,700, and that will

1 probably -- I imagine I still have to pay towards
2 Eylem for possible, for conference in New York. What
3 more can I do with my grants? To quote, make Luke
4 successful to take the class.

5 Q. So Carolyn sent you this email asking you if you are
6 willing to sponsor Luke Williams for \$2,700?

7 A. Eylem \$2,700 because she is taking my RA. She is
8 working for me, so yeah.

9 Q. Did it appear that you had the funds to do that?

10 A. Of course, we did. She did pay the funds, yeah.

11 MS. DOUKOURE: I move to admit this as FM-9.

12 MR. REIFENBERG: Objection?

13 DR. PROMISLOW: No objection.

14 MARKED FOR IDENTIFICATION

15 FACULTY MEMBER EXHIBIT 9

16 2:26 p.m.

17 MS. DOUKOURE: I am going to show Professor
18 Akbulut what is behind Tab F. It is document Number
19 31.

20 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
21 this email?

22 A. This is an email from Wolfson.

23 Q. And what is the date of this email?

24 A. October 24, 2014.

25 Q. And what are the summary of contents under this email?

1 A. He is basically saying you must understand that Luke
2 Williams cannot have a dissertation completion
3 fellowship and take this course, take the course, take
4 courses. He cannot have -- he is saying that he
5 cannot have dissertation completion fellowship and
6 take courses. There is a college policy permitting
7 only one credit in the semesters that the DCF is used.
8 Here it's showing that Professor Wolfson doesn't think
9 in a year Luke can take courses.

10 This is not a high school. You know, you
11 have to pay from the door to get into restaurant.
12 This is university. This is student university. I
13 mean, he can take this course, of course, and spend it
14 in any amount of credits he wants. I pay money if he
15 wants to use more.

16 MS. DOUKOURE: I am going to move Exhibit
17 FM-10.

18 DR. PROMISLOW: No objection.

19 MARKED FOR IDENTIFICATION

20 FACULTY MEMBER EXHIBIT 10

21 2:28 p.m.

22 Q. (BY MS. DOUKOURE) Professor Akbulut, I am going to
23 hand you what is behind Tab F, document number 23.

24 MR. REIFENBERG: Now we are on F-23.

25 MS. DOUKOURE: Yes. I will admit my binder

1 is not as neat as it appears to be.

2 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
3 this document?

4 A. Yeah, this is an email from Beth Koivisto, who
5 testified, department secretary overlooking Carolyn
6 Wemple.

7 Q. What is the date of the email?

8 A. February 1st, 2016.

9 Q. Can you please summarize the content of this email?

10 A. So as you see, I have been still complaining that this
11 is obvious issue, and then I ask Beth for
12 clarification.

13 Here she says, I must have misunderstood you.
14 There isn't a policy that graduate student cannot take
15 more than one credit, contradicting Professor Wolfson.
16 They can only pay for one credit. Okay. It could be.
17 You agreed to pay Luke \$2,700 to supplement the
18 difference in his income from assistantship to the
19 DCF. She is also acknowledging that I give all this
20 money just in case he needs extra money for anything.

21 And, by the way, I at the time, I also
22 telling Luke, please don't pay this money. I have all
23 this grant money. Just don't pay money. I will take
24 care of it from my grant.

25 Q. In your opinion, does this email from Beth Koivisto

1 agree with or disagree with the email that we just
2 talked about?

3 A. No, no, it's a contradiction. Start off by saying
4 people with DCF cannot take courses, take courses at
5 the same time. By the way, I never see this. I have
6 been here 37 years. I never seen such rules impose on
7 students. Students can sit classes, take courses any
8 other place. This is a learning institution.

9 MS. DOUKOURE: I am going to move to have
10 this admitted as FM-11.

11 DR. PROMISLOW: No objection.

12 MARKED FOR IDENTIFICATION

13 FACULTY MEMBER EXHIBIT 11

14 2:31 p.m.

15 MS. DOUKOURE: I am going to show Professor
16 Akbulut what is now behind Tab F. It is document 28.

17 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
18 this document?

19 A. I do recognize this document. Remember, I had some
20 students want to take this class. I taught this
21 class, successful student. This is the sixth one,
22 this is the sixth one telling me she tells sometimes
23 her family that she wants to take this class, and that
24 here, this document tells me, she tells me in this
25 document, it's okay October 22nd. One day after the

1 course closing, she is override or denied.

2 Remember, October 22nd, that's midnight, past
3 midnight, so she couldn't do by midnight October 21st
4 because of that fatality, and then she got denied, her
5 request for overrides denied. Just imagine three
6 months before she was excited. She now told me after
7 we -- she know the -- I know we can help. She send it
8 through, she send it through, and she was really
9 angry. Shortly after that she left the university.
10 She went to different university. She is out-of-state
11 student.

12 Q. Do you know how many students Charging Party is
13 alleging were enrolled by the deadline?

14 A. Charging Party, that only four.

15 Q. Did those four students that they are alleging were
16 the ones that were enrolled, did they include Luke
17 Williams?

18 A. No, they are excluding Luke, they are from the
19 beginning. One of the reasons I am opening the
20 courses, Luke's request, because he is the closest to
21 this theorem. His thesis about this theorem, closely
22 related to this theorem.

23 Q. What's the name of this student that's on the document
24 who was not overridden or denied?

25 A. Her name is Shu-man.

1 Q. Was she one of the four students that were enrolled?

2 A. No, no. This is like the sixth student.

3 MS. DOUKOURE: I am going to have this
4 admitted as FM-12.

5 THE WITNESS: Because she is not allowed to
6 enroll.

7 MS. DOUKOURE: Hearing no objection.

8 DR. PROMISLOW: No. I am sorry. No
9 objection.

10 MARKED FOR IDENTIFICATION

11 FACULTY MEMBER EXHIBIT 12

12 2:35 p.m.

13 MS. DOUKOURE: I am going to ask
14 Professor Akbulut what's under Tab F, document number
15 26. I am sorry, 27.

16 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
17 this document?

18 A. Yes, Shu-man is explaining, she is saying that my
19 override request was never processed. I made it the
20 day before at night. Just reading this I get
21 emotional, because she didn't deserve this.

22 MS. DOUKOURE: I move to have this admitted
23 as FM-13. Hearing no objection?

24 DR. PROMISLOW: No objection.

25 MARKED FOR IDENTIFICATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FACULTY MEMBER EXHIBIT 13

2:36 p.m.

MS. DOUKOURE: Now I am going to hand him document 26.

Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize this document?

A. Yes, basically the below part Keith is telling students, you know, there is reading course, and then, you know, it's just telling I think student should take the reading course. This was his understanding.

But I think Promislow doesn't know what this is. He doesn't know at all I have been holding reading courses for my reader students. There is a room two doors down. Every Friday 4 to 6 I hold a reading course. This is how we get successful students in mathematics.

I wanted to have a reading course from 4 to 6 every Friday, Room C-329. And then on top of it he is asking, he is saying, telling students, you know, you make the reading course. You do not do bargaining. They are there. They register. They come from all over the world to take course. They are all confused about this.

So my clarification, these kids are topology students. I hold Topics Tuesday night usual time,

1 Friday 4 to 6. He doesn't know this. Not to be
2 confused with the departmental topology seminar on
3 Mondays 4 p.m. I also hold every 4 p.m. Monday
4 formal, so I have three hours of contact I put in the
5 department. Two for English for such students, and
6 one for the radar seminars. The Topics course is Math
7 996, usually Tuesday, Thursday 2:30 to 4 p.m. So this
8 is different completely. Topics was a regular course.

9 By the way, I was leading really different
10 topology course on top of this. Nobody in university
11 can teach three courses top of each other. It's
12 physically impossible. I am teaching a research
13 course, which I am spending all night preparing, then
14 I am teaching an omnivision complex analysis, two
15 courses I am teaching, and he is just telling me, oh,
16 just teach this as a reading course, and he doesn't
17 even know I already have reading course. If I didn't
18 have those courses, how can I have students like this?
19 So there are students which we are proud of. They are
20 going to Harvard. You cannot have students like this,
21 story like this, if you don't involve them constantly.

22 MS. DOUKOURE: I am going to move to have
23 that admitted as FM-14.

24 MARKED FOR IDENTIFICATION

25 FACULTY MEMBER EXHIBIT 14

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

2:40 P.M.

MS. DOUKOURE: I am going to hand Professor Akbulut what's behind Tab F. It's labeled as document 4, 5, 6, 7, and 8.

Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize these documents?

A. Yes, I do.

Q. Can you characterize what these documents are?

A. Well, documents came up as follows: After Dean Kirkpatrick refused to reply to me, my question for help with what Promislow was doing, I was sent to provost office. I went to Terry Curry pleading him for help. You know, in the process I think I met with him several times, and then every time I went his office he promises, yes, he will look into my grants, he will look into my students. Then I find out he didn't contact any of the students, he didn't look at any grants, but he send me letter that he concurs with Promislow, his giving me this Abrogation of Duty Penalty.

I met with several times his office. He said, well, now you should go to grievance office and then either take a chance on teaching this third course Promislow is giving, take a chance, just go to the grievance office or teach all these courses, all

1 these courses, three courses, and then go to grievance
2 office, and then I don't know what will happen if I
3 win the grievance. Then, you know, all semester is
4 down the drain and no courses. I couldn't teach the
5 courses.

6 He said I have two options. He advised the
7 second option, teaching all the courses, and I said,
8 Sir, I said, Look, I take the first option. I will
9 take my assigned teaching. By the way, my assigned
10 teaching was given to me by the vice chairs when I
11 meet the chair each ten years. One plus two courses
12 are specified.

13 So I told Terry Curry, I am teaching my
14 assignment as specified in the formal letter I
15 received. Vice chair is in charge of teaching. He
16 says, Go ahead, whatever.

17 I went to the grievance office, faculty
18 grievance office, and then I met Professor Donahue,
19 Bill Donahue. He told me, Oh, yeah, I can hold you.
20 You have right to grievance here. I will hold you
21 grievance hearing, but you bring all the documents.

22 Again, I am copying documents while I am
23 teaching this course. Going back and forth copying
24 documents, back and forth, give it to him. He said,
25 By the way, you need lawyers, counselors to do this,

1 to put it in a deposition. I found out what
2 deposition means, like deposition means like lawyers
3 telling what's your story.

4 So I just went to lawyers, regular lawyers,
5 his office. He said, Sure, I can write listing for
6 the hearing, so I went there. He wrote a list and
7 charged me. He charged me \$3,000. Felt bad, but I
8 know I am truthful, I will win this. Paid \$3,000,
9 took this deposition to the grievance office,
10 Donahue's office. He told me come back in couple of
11 weeks and he give me instructions what to do.

12 Couple of weeks later he told me, I am sorry,
13 you cannot put this through because Hedden, Wolfson,
14 Promislow, and Kirkpatrick. I'm not a fan of Hedden
15 also, because he also refused to, gave me the penalty.
16 What? So you didn't do new reason? So I have to go
17 to lawyer, pay some more money, get similar material.
18 Now name of all those four present.

19 So I gave this -- now I am still feeling kind
20 of good, because I finally have a hearing, just like
21 today we are having. I will explain this.

22 I waited a couple of weeks, and I get the
23 phone call from Donahue. He told me he decided
24 against holding a hearing for me. I said what? He
25 said, Well, I am in the speech department. In our

1 department, whatever the chair says we teach. So
2 that's why on that basis I am assuming the chair, your
3 chair wanted you to teach, then you must teach.

4 I mean, you can only get a response like that
5 from a totally ignorant person. If I go to -- you
6 know, grander person would ask -- you know, I didn't
7 teach a course chair gave me. Of course he will give
8 me a response like this, because he doesn't know how
9 the university works, how our teaching time works. He
10 doesn't know anything about contractual obligations
11 university has for me when they hired me.

12 Technically, chair has the power, of course
13 power. He can tell us teach the students, teach ten
14 courses. He can even tell me to clean the bathrooms,
15 but he cannot abuse his power. We have contractual
16 agreements protecting us, but he was abusing his power
17 making me go through this pain. So then I was
18 heartbroken. I got back to Terry Curry. Should I
19 continue the story?

20 So that lawyer in the meantime told me, oh,
21 to protect yourself have your students sign affidavit.
22 They are present taking class and sign it. These poor
23 students, while going through course, had to go to law
24 offices, the notary publics and notarize it, and many
25 of them are foreign students and they don't know

1 anything. They had to go through this, get
2 affidavits, five of them, sign these affidavits during
3 the course was taking place.

4 Q. And do that affidavits discuss the Topics course that
5 was cancelled?

6 A. Yeah, it says that this course took place, Math 996.
7 There is two Math 996.

8 Q. Does it describe your teaching method?

9 A. Yes, yes.

10 Q. And who took this?

11 A. The professor at each of the class provides
12 instruction and needs instructions, is regular
13 scheduled class and provides us complete --

14 DR. PROMISLOW: Objection. These witnesses
15 who signed the affidavit are not here to testify to
16 them, so I won't be able to cross-examine them.

17 VOICE: I am here.

18 MS. DOUKOURE: Two of witnesses have already
19 given signed testimony. That's statement one.

20 Statement two is there are affidavits signed
21 under perjury by a notary that corroborates -- excuse
22 me.

23 DR. PROMISLOW: My apology.

24 MS. DOUKOURE: That corroborates testimony
25 that's already been given orally and testimony that is

1 contained in the other exhibits by those witnesses
2 that are here testifying.

3 THE WITNESS: It previously states that --

4 MS. DOUKOURE: Professor Akbulut, you have to
5 wait till the panel makes a ruling, and then we will
6 start again.

7 MR. REIFENBERG: I am going to admit this for
8 what it's worth.

9 MS. DOUKOURE: I move to admit it, but thank
10 you.

11 THE WITNESS: Should I explain what's
12 written?

13 MS. DOUKOURE: It's okay. It's FM-15.

14 MARKED FOR IDENTIFICATION

15 FACULTY MEMBER EXHIBIT 15

16 2:49 p.m.

17 Q. (BY MS. DOUKOURE) Professor Akbulut, who is Richard
18 Schwartz?

19 A. Could you repeat that?

20 Q. Whose Richard Schwartz?

21 A. Yes, Richard Schwartz. I have been during all this
22 time talking and pleading with Keith, you know, don't
23 do this to me. He told me, Well, I will dispute
24 Ombudsman office. I said, Who is the Ombudsman? He
25 said Schwartz. Since then I found out there is no

1 such office in there, and Ombudsman mainly associate
2 dean, Dean Kirkpatrick, who had been refusing to meet
3 with me. So when I saw this, I found out about the
4 Ombudsman, I felt relieved. It is somebody in College
5 of Natural Science will mediate, will look to my
6 situation.

7 So I called Richard Schwartz, called
8 Ombudsman, but he said, Yeah, I will make a decision
9 for you, no problem. So I said, Okay, I am coming to
10 your office with my documents. He said, No, no, no,
11 don't need them. Just come and sign document. I will
12 make a decision. I signed the document by email, and
13 then he made the decision right away, short time. He
14 said, After looking at this, it's clear that your
15 student, Luke, didn't want to take the course. That's
16 why I am ruling in favor of Keith Promislow,
17 Jon Wolfson closing this course.

18 I said, This can't be. I know more -- Luke,
19 he is my -- I see him every day. I offer to him
20 conference emails so that we would all talk to each
21 other. Said, Okay, let's do that.

22 So I put Keith and then I put Richard
23 Schwartz, which is the associate dean, and there were
24 some other people. We talk to each other through
25 email, and Keith -- Luke was enthusiastically saying

1 he did want to take this course, he does want to take
2 this course. Then Richard Schwartz says, Okay, I am
3 going to make new decision, okay, and shortly
4 thereafter he said that he made a new decision. He
5 said, I am siding with Keith Promislow. Even though
6 the student wanted to take this course, unfortunately,
7 your grant, or three of your grants are totally
8 encumbered. I cannot this course for Jon, allow this
9 course for Jon.

10 I was shocked, because it's the College of
11 Natural Science, CNS, that is overlooking Carolyn.
12 There is a couple of secretaries overlooking Carolyn's
13 job. They have access to computers, cga.msu and
14 reg.msu. These are root services. They could just
15 call the records right away. He wasn't doing -- he is
16 associate dean. He is in dean's office, CNS. He has
17 access to all this. He says these are the claims. My
18 grants are totally encumbered.

19 MS. DOUKOURE: I am going to provide
20 Professor Akbulut the document marked as Tab F,
21 document 19.

22 JUDGE WHITBECK: Did we establish who Richard
23 Schwartz is?

24 MS. DOUKOURE: He is the associate dean for
25 graduate studies.

1 THE WITNESS: CNS, College of Natural
2 Science.

3 MS. DOUKOURE: In CNS.

4 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
5 this document?

6 A. Yes, I do.

7 Q. Can you summarize?

8 A. Yes. The heart of the ruling I highlight. He
9 basically says, after conferencing with Luke Williams,
10 he says, Your generous offer to pay Luke's tuition
11 from your NSF grant did not afford a solution because
12 the grant is fully encumbered. On learning this, Luke
13 apparently chose not to enroll, not having any means
14 of paying the tuition.

15 This is complete lie. Associate dean should
16 never talk like this without looking at the records.
17 This is contrary. It is just atrocious, and these
18 people highly paid associate dean sitting in there to
19 resolve case like this.

20 Q. Can you read the third paragraph. I was going to say
21 the first paragraph, but the third paragraph, the
22 whole paragraph.

23 A. Third paragraph. Placing myself in Keith's shoes,
24 this presents the choice between scheduling a course
25 that will likely need to be cancelled for

1 underenrollment, placing the students in the position
2 of needing to reschedule their course work at the last
3 minute, or simply cancelling the course now and
4 allowing the students to set up their spring semester
5 schedules in a timely fashion. He chose the latter.
6 I believe that was a reasonable decision.

7 He is basically saying the students feel drop
8 the course.

9 Q. If the course was open on October 20 with four
10 students, would they have had to cancel this course?

11 A. No, no.

12 Q. Were there other courses that semester, which is the
13 spring semester of 2015, that ultimately ran with less
14 than five students?

15 A. Yes, it did. I provided list.

16 Q. Were there classes that ran in spring of 2015 that ran
17 with three students?

18 A. Yes, yes, there were.

19 Q. And were there classes that ran in the spring of 2015
20 with less than three students?

21 A. Yes, there was.

22 Q. Were there classes that had less than five students
23 that were cancelled after October 20th?

24 A. Yes, there was. I provided examples.

25 Q. No, I think you misunderstood my question. Were any

1 classes that were open at the deadline for cancelling
2 classes in October of 2014, were any classes cancelled
3 subsequent to that?

4 A. None, none.

5 Q. So if your class is open on October 2014, what would
6 have been the threshold for cancelling their class
7 that ran in the spring of 2015?

8 A. The number of students?

9 Q. Yes.

10 A. Five.

11 Q. After that. If it was open and hadn't cancelled it,
12 how many students --

13 A. There is the constitution. They kept it.

14 Q. So the assertion is that Keith might have had to
15 reschedule or cancel the class later. Is that
16 accurate assertion of what took place in the math
17 department?

18 A. No, no.

19 Q. What is the date of this email?

20 A. The date is October 30, 2014.

21 Q. How many days after your class was cancelled was this?

22 A. This was like nine days maybe.

23 MS. DOUKOURE: I move to admit this as FM-15.

24 DR. PROMISLOW: No objection.

25 MS. DOUKOURE: 16, FM-16.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MARKED FOR IDENTIFICATION
FACULTY MEMBER EXHIBIT 16
2:58 p.m.

MS. DOUKOURE: I am going to hand Professor Akbulut what is under the same Tab F. It is labeled as document 1 and 2.

Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize these documents?

A. Yes, I do.

Q. If you look at the second page of the documents first.

A. Yes.

Q. Can you describe that document for us?

A. Yes, this is a formal letter from the vice chair who is in charge of teaching assignments, and this is sent to me August 20, 2014. She is specifying what my courses are that I am supposed to teach. One in fall, two are spring, spring courses. 496 research was under fall '14, and spring 2015 two courses. One is this 996 course. The other is complex analysis, advanced undergraduate class. These were my formal assignments from her office.

Q. And if you look at the first page of that document, can you please explain to me what that document is?

A. Yes, it says teaching load. Hello, Selman. Your default teaching load is three. If the default is

1 incorrect, please contact your email for fall 2015/
2 spring 2016. Please specify what you think your
3 teaching load should be, whatever. This is just
4 basically telling me your teaching load.

5 Q. And which academic school year was that?

6 A. This is a document included in email, in info service
7 under my name, so then I go to info service and click
8 my name. I see this document, my teaching load. I
9 don't know that many places. I guess, you know, I
10 can't tell, but this is from a website.

11 Q. How long have you had the same teaching load?

12 A. Long time. I think in the beginning when I come to
13 university. If you go 30 years before, it felt
14 atrocious being an associate, so one of the
15 contributions I made to the university, I called for
16 an external review. We revamped teaching roles, and
17 give faculty the opportunity to do research on the
18 improved level of the courses.

19 After that, basically everyone active people.
20 Active people means regular assigned jobs in teaching
21 and in research, and they basically 90 percent of the
22 faculty is now included there. Teaching load is
23 three. So normally it's like one, two or two, one.

24 In my case, I would rather have 996 be one
25 and the other package together, but now I look at the

1 challenge. One individual class in fall, I did that,
2 and I teach 998, research class, and 425 complex
3 knowledge class. So these are the courses I taught.
4 I taught. I did teach these classes.

5 MS. DOUKOURE: I move to admit these.

6 DR. PROMISLOW: No objection.

7 MS. DOUKOURE: It will be FM-17.

8 MARKED FOR IDENTIFICATION

9 FACULTY MEMBER EXHIBIT 17

10 3:03 p.m.

11 Q. (BY MS. DOUKOURE) You testified just now that you had
12 previously called for an external review of the
13 teaching loads. How was that call for review received
14 by the math department?

15 A. I think the self-respecting math departments usually
16 call external review itself, because you can never
17 review yourself. If you do that, you get the
18 situation like this we have at MSU. Nine people
19 giving each other zeros, and they got the whole
20 department.

21 So high level universities, upper lever
22 universities require departments to have external
23 reviews. They require colleges to have external
24 reviews, and then look over the process as a third
25 independent observer and make recommendations, and

1 then external review, of course, are very much binding
2 peoples. The governor can step in, fire everybody if
3 they don't follow the rules. If you don't have that,
4 you have corruption.

5 Look at our university. Our university needs
6 to have external reviews. We have all these problems,
7 people getting raped and all these crimes at the
8 university, and that we just fine people, sending to
9 jail. People crying, What happened to the system?
10 There is no way looking at the system can direct it to
11 just adjudicate this. You cannot. We are ground
12 stage. In this university, we are ground stage. Just
13 changing one president, one person there, you cannot
14 make change. You have to have people looking outside
15 to the system and change people wholesale, you get a
16 new system.

17 Q. When you called for an external review, did anybody
18 ostracize you?

19 A. No, because I was a new faculty at the time. I have
20 two fields. One is geometry, and the other is
21 topology, and I think myself expert from both fields,
22 but I just do, as a young topologist and I am invited
23 to the university, they negotiated with me, and then
24 they told me they were looking to critique their
25 atrocious situation.

1 I see my colleagues teaching courses, four
2 hours a week courses. You know, I told them, you got
3 the research, it's nice, and they listen to me. And
4 then they helped me to request for the external
5 review. Everything else was run smoothly, because I
6 was a favorite faculty. They want to make me feel
7 comfortable. Not anymore.

8 Q. If you could compare the atmosphere and the response
9 to you calling for an external review of the math
10 department then versus you calling for a review of
11 what happened to you in your penalty, if you could
12 characterize the difference, how would you
13 characterize it?

14 A. The difference is incredible. It is unbelievable. If
15 you write this in a novel or make a movie, present to
16 you, I say you are going overhead to make it more
17 realistic, because it is so crazy. I mean, you see
18 with your own eyes the chairs telling I decide what
19 free speech is. I tell them what to say, what to
20 think, and then anytime, anytime I meet with
21 higher-ups in this university, I tell them, We need
22 external review, otherwise you cannot repair these
23 things.

24 So two secretaries who testified here, both
25 get divorce same time. I don't think they were

1 deserving people. So they are devoted for certain
2 things, that to me is clear, but I won't verbalize
3 them.

4 It has been hostile environment right now. I
5 cannot say anything. Even the friend that you
6 recommend them for years, and they are pointing out
7 problems with the election, problems with reviewing.

8 Chair, just had a chair election. New dean.
9 We had a new dean. We are hopeful, maybe things will
10 change, but the dean who authorized me, he didn't
11 come. It was the dean's old faculty. Lucas Pierson,
12 MSU, they didn't come, so we had no faculty, and he
13 all buddy, buddy, you know, Keith Promislow, that he
14 maybe allow him to interview himself and be helpful
15 with him and review what was conducted by Jon Wolfson.

16 So I said it, Why can't we have, you know,
17 serving some other, people that review this so people
18 can watch the opposition. I was shot down and people
19 made fun of me because I was attempting to do that.

20 Jon Wolfson and Keith Promislow, then he is
21 again. We just had one MSU election, and he is the
22 chair right here.

23 Q. And how many times in MSU history, do you recall?

24 A. I never recall one nomination before. I never. This
25 is atrocious. Right after this are so many emails, so

1 many complaints. We are saying joking. Why? Because
2 they can. Because it's a nepotistic system. They
3 can. Everybody is friends.

4 I found out during the problem with my class
5 cancellation there is a committee, UCFA, University
6 Committee on Faculty Affairs. Anne Hughes is on the
7 committee and Terry Curry is on committee, and Donahue
8 is.

9 Everybody listen to Mike Tomlinson in this
10 company. He testified. He decided I should get a
11 heavy penalty, strong penalty. It turns out he was
12 lying. But Tomlinson, Terry Curry, and then Donahue
13 are in the same committee talking to each other, and
14 then sending me from one office. Terry Curry sending
15 to office of one and the other. They circulating.

16 This is unhealthy. This is sequestration.
17 You cannot have environment like this. These
18 committees, these offices should be independent of
19 each other. You go back, you go this office, you
20 respect them that you know you get ethical decision.
21 They will give ears. Every time I go there, they are
22 the same.

23 Q. Professor Akbulut, do you know how many faculty
24 members there are in the math department?

25 A. Forty, 50. I don't know exactly.

1 Q. And are there faculty members that you have a good
2 relationship with?

3 A. Very few, because I am completely shut out, and I used
4 know. I used to be involved in having a piece of
5 that. Now I am completely shut out. They laugh at me
6 if I try to get involved. I am not anymore. I only
7 get involved a few people who are also, you know,
8 discriminated like me, few faculty. Other than that,
9 you know, nobody talking to me. I am taking
10 elevators, they are not looking at my face. Here I
11 run into them.

12 What have I done? I mean, they somehow, in
13 their mind, they determined this guy did something
14 horrible to our university. He shouldn't be around.
15 He should be fired. They are all convinced. I don't
16 know what kind of state of mind people can put inside
17 them.

18 So it's a big person trying to get rid of me.
19 One of my colleagues I used to talk about, he died.
20 Trying to change this, he died. Terrible cancer. And
21 to the last day he worked. He came with me to OIE.
22 He tried to make conversation with Promislow.
23 Promislow was constantly penalizing him, because he is
24 rich in his eyes. Why was he penalizing? Because he
25 made mistake about exam. Promislow said, You cannot

1 teach these courses. Now I am putting supervisor over
2 you, then he will tell you what to do. This is very
3 humiliating, a professor to do this. Usually you do
4 this for a new, you know, foreign students or new grad
5 students.

6 So he was given heavy teaching loads, and
7 then this guy was constantly in pain. Constantly in
8 pain. He also was a cancer patient, and he died
9 recently. And I attempted to write obituary. He
10 wrote obituary of this guy. He made terrible remarks.
11 He said that he lived by his own rules, meaning that
12 this guy didn't -- you know, he was outlaw. In his
13 obituary he writes. It's very hurtful to me.

14 Q. Did you find those words to be very demeaning that he
15 lived by his own rules? Did you find those words to
16 be hurtful and demeaning to the person who passed
17 away?

18 A. Yes, and there is couple of others. The other one is
19 Abbas Dinesh (sp). Nice faculty because -- they fired
20 him from graduate. But by now I saw a bit of miracle,
21 and they are asking him could you tell how department
22 did? He says, I am sorry, I have a family, children
23 to look for. I cannot answer. Is this the kind of
24 response you are getting, Keith, getting of your
25 faculty? This guy is saying I am afraid to answer the

1 question, you want resources, because something might
2 happen to me. It's in the OIE report. I can tell you
3 have a family for children to look for.

4 So this is an indication of how much
5 retaliation you put in front of people. There was
6 another faculty, my friend, that he made the book
7 about problems of the math department, very
8 comprehensive book, and he mention this guy. Now, he
9 didn't scare this guy. He is lost. He is afraid.

10 He is a movie buff. He likes classical
11 movies. He put some movie poster on his door, and
12 Schenker, who was here, who is assigned to next
13 teacher -- he gets assigned next chair -- because he
14 give himself a sabbatical. He made this guy a chair.
15 He made himself associate chair or something. They
16 are just changing things amongst each other, and then
17 this guy, Schenker says, I don't like the movie
18 poster, it is insulting to me, about this movie, that
19 he started process against this guy with the blog,
20 that he is insulting his colleague, and then again, he
21 finally said, okay, I am taking down everything. I am
22 not talking.

23 But this is not healthy. You don't scare
24 people by penalties and then make them take steps
25 recklessly. You want people to be honest friends so

1 that you can learn people's feelings and then you can
2 reorganize the faculty. Just you having a problem
3 doesn't mean you can use this power. You can abuse
4 this power. The power comes from the modesty. You
5 have to be modest. You have to be helpful.

6 Q. Professor Akbulut, I am going to hand you what is
7 binder Tab H. It's the only one under that binder
8 tab.

9 Professor Akbulut, have you ever read this
10 document?

11 A. Yes, I do.

12 Q. This is a document we discussed before, correct?

13 A. Yes, yes.

14 Q. Can you please explain what the document is?

15 A. Yes. I mean, this is a document August 2015. I keep
16 trying to tell him that these things wrong things, and
17 then I think maybe some people in the faculty, they
18 told him he should do things over, he should correct
19 what he has done. So he sent an email to all
20 department. This email acknowledges that Professor
21 Akbulut did teach this class, did teach this class,
22 but he still not -- I mean, he is saying that they
23 also -- you know, he had a commitment. They
24 determined that, apart from serious communication,
25 Professor Akbulut met the established criteria in

1 teaching. He told me that in my office too. Yeah,
2 yeah, cost me \$5,000.

3 And the appeal process outside the door would
4 have resulted in the course running. So that means if
5 I appealed the process, the course would have run, so
6 I was right. But he said all the time he is denying
7 the appeal process, grievance process. Here he is
8 just telling me there was an appeal process I would
9 have found right. Given that Professor Akbulut held
10 the associate graduate course, this course, and he
11 said he'll reduce the decision to compensate Professor
12 Akbulut with one teaching reduction, whatever. I
13 can't tell you what ensued after.

14 Q. Was it your understanding from this email, the
15 document, that they were saying that had you been
16 given the appeal process that you were entitled your
17 course would have run?

18 A. Of course, and they didn't give me an appeal process.
19 I went every possible route to get my appeal,
20 grievance.

21 Q. I am not going to admit this document, because it has
22 already been admitted, but for ease of access, I
23 didn't want to have to go back to read Charging
24 Party's document.

25 MR. WHITBECK: But do you know what the CP

1 number is?

2 DR. PROMISLOW: 57.

3 MS. DOUKOURE: Thank you. I thought it would
4 be easier than flipping back through different
5 binders.

6 I am going to hand Professor Akbulut what is
7 behind Tab K.

8 MR. REIFENBERG: K?

9 MS. DOUKOURE: Yes.

10 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
11 the document?

12 A. Yes, I do.

13 Q. Can you describe this document for us, please.

14 A. Should I read?

15 Q. I prefer you tell us what it was.

16 A. Basically this document is President Simon and
17 Professor June Youatt saying that there have been
18 serious discrimination and bullying cases of both
19 faculty and grad students in the math department
20 targeting grad students and the faculty who are
21 critical of the chairs and CNS dean's unethical and
22 supervisory conduct in related issues.

23 So far very specific cases have been
24 discussed in our website and blogs and reported by the
25 MSU Office of Institution Equity. While math chairs,

1 CNS deans, and culprits are not dealing with this. We
2 hope that you deal with this urgently. We felt that
3 we needed to write open letters, because every office
4 they can they refusing to talk to us.

5 Q. How many professors signed the document?

6 A. Three.

7 Q. Can you name them.

8 A. Myself, Professor Peller and Kirill Vaninsky, who just
9 died.

10 Q. And was it your understanding, whenever you signed
11 this document, they were agreeing in accordance with
12 the contents of this document?

13 A. Of course. We discussed with each other a lot. We
14 were trying to get to be heard. We tried the school
15 newspaper. They frightened school newspaper. This is
16 what they do at the university.

17 Before, I used to be able to write, you know,
18 a letter to the newspaper. They will publish it. I
19 will, you know, criticize hunting, whatever, they
20 publish it. Now there is a high demand. The students
21 are afraid even to discuss these things. Lansing
22 State journal, school newspaper, no place. They are
23 not responding to us, so we thought we just should
24 write an open letter, put on our website and send it.

25 Q. Can you tell us what the date of this document is?

1 A. December 1st, 2016.

2 Q. Was this -- this was it after your Abrogation of Duty
3 Penalty?

4 A. I think so. Yeah, it is.

5 MS. DOUKOURE: May I move to admit this as
6 FM-18?

7 DR. PROMISLOW: No objection.

8 MARKED FOR IDENTIFICATION

9 FACULTY MEMBER EXHIBIT 18

10 3:22 p.m.

11 MS. DOUKOURE: I am going to hand Professor
12 Akbulut what is behind Binder Tab J. J as in Julia.

13 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
14 this document?

15 A. Yes, I recognize this document. This is after Terry
16 gave me runarounds. But it was a good thing. You
17 know, I told him I still think the guy, I did still
18 think that he was a good guy, some independent person,
19 and then he told me, well, only thing you can do is do
20 review. What's that called that only dean can do?
21 Somebody remind me which review.

22 Q. Did you draft this letter?

23 A. Yeah, I did, so to start the process, the review
24 process. He can -- only the dean can start to review
25 this. So I told Keith, Keith, you are family, Keith.

1 I know Jim Kirkpatrick and Keith Promislow are the
2 ones harassing me. How can you send me these people
3 to review this. Is this fair? He said, It's the only
4 recourse. They will have to be an independent, write
5 this independently that you might get what you want.
6 I mean, reluctantly I went, again, I went to all
7 events. I appealed Jim Kirkpatrick, who still was
8 refusing to talk to me.

9 Q. Did anything happen after this?

10 A. Well, then he called the chair. I mean, it's
11 nightmare. He called the chair. The chair calls, the
12 chair calls the advisor -- I happen to be advisor
13 committee. It might come surprise to you. I am shut
14 out. The reason I was advisor committee is because
15 this open letter we wrote, and then he is thinking --
16 and I said, I accept it. I replied previous letters.
17 I said -- I thank him, now bygones are bygones and
18 everything is so.

19 I didn't hear that he told me, you know, he
20 wants to make friends and everything. I didn't
21 realize he was keeping the Abrogation of Duty Penalty.
22 I found out a few weeks after he wrote this letter. I
23 did not accept that. So after this thing happened.

24 So Jim Kirkpatrick called Promislow, asked
25 Promislow to make a conclusion to investigate, review

1 my case. So I was, because of this, I refused him and
2 then I tried to accommodate because he made friends
3 with me.

4 So they told me get out of the committee. I
5 said, How can you, if you are actually thinking about
6 me, you should keep me so I can give you my documents.
7 Then they decided, no, no, no. This is not a
8 grievance committee. It's a review committee. We are
9 not supposed to meet. Get out. They kicked me out,
10 and then only five people in here. He and Jim
11 Kirkpatrick, they wrote this review, institutional
12 review.

13 Q. So after you wrote this letter, what did you think
14 would happen when you started the duty process?

15 A. Well, I still thought -- I think it's crazy, because
16 they are making, making my case review by kicking me
17 out, harassing me. This is crazy. But still I,
18 because I feel strong, everything, even documents, I
19 still had a little hope maybe they will just look at
20 the documents and finish it. But then, you know, they
21 wrote the report afterwards, and the report was saying
22 my transfer totally incompetent and the courses are
23 cancellation voluntarily.

24 Q. Did you expect Mr. Kirkpatrick to send it back down to
25 the math department?

1 A. No, I did not. I thought he would call back later and
2 was excluded. This was an insult to me. In fact, I
3 told Terry, How can he do this? I don't even know
4 what he looks like. I never met him, because every
5 time he comes to the math department I have a teaching
6 assignment. I have some idea who he is. Is this, is
7 this right? He told me after writing this report, he
8 hand to meet me. So I thought maybe meeting Jim
9 Kirkpatrick face to face I can explain to him.

10 So he made a big deal about not reporting
11 him, you know, so we decided to caucus, and the first
12 thing I told him, Look, your dean and associate dean
13 telling me completely opposite in report. He told
14 me -- you know what he told me? He said his writing
15 is not binding. He is not an Ombudsman. He is
16 independent from us. He has nothing to do with CNS.

17 MS. DOUKOURE: I am going to move to admit
18 this as FM-18.

19 DR. PROMISLOW: No objection.

20 MS. DOUKOURE: 19.

21 MARKED FOR IDENTIFICATION

22 FACULTY MEMBER EXHIBIT 19

23 3:28 p.m.

24 Q. (BY MS. DOUKOURE) Professor Akbulut, so far you have
25 outlined things that you have done to try to have your

1 side of the story about your Abrogation of Duty
2 Penalty heard. How would you characterize people's
3 response to your request for that oversight?

4 A. Oversight, you mean in the department?

5 Q. Let me simplify it. How would you characterize the
6 response to your request to have your side of the
7 story heard?

8 A. I did not hear at all. I never given the chance to
9 get people to hear. Never. I am introspective. No
10 one is interested. All they have to do is just log in
11 CGA.MSU or REG.MSU. Nobody doing it, but they are
12 going to stand on the communicating that go left, go
13 here, go to the dean's office and expect me to just go
14 to there, and I'm given runaround. It is a really
15 crazy process.

16 I live things, some other victims' stories.
17 I am talking about gymnasts. They are two girls, go
18 to this office, that office, that office, that office.
19 Nothing is settled. This is the exact same nightmare.

20 I thought maybe I could appeal my colleague,
21 Jon Hall, who was an ex-chair, previous chair. He
22 told me, There is one thing you can do there. In
23 general meeting, you can make a motion. You can
24 indeed make your motion. You stand up in front of
25 your department. You make this motion, okay.

1 So, okay. I get up in my department. I had
2 the chair there to say that you did teach this course?
3 You were there every time, right? So I am about to
4 make a motion. All of a sudden there is commotion.
5 People are yelling and talking over me, you know, at
6 the end of the meeting, and then 30, 40 people, 30
7 people maybe, and then they are yelling and joking
8 with me, and then Jon Hall told me, Selman, I made a
9 mistake. You are not supposed to make this motion.
10 The chair has a right to make the motion.

11 I said, How crazy is this? I made this
12 motion against the chair. Now I have to give the
13 documents to chair to make a motion against himself?
14 Yes, that's the rules. So I step aside from the
15 podium, I step aside, and then Keith start proceeding
16 with my motion.

17 It was a joke, complete joke. He just made
18 some elections and some voting, and I lost. After
19 that I had a heart spasm at the interviews, because it
20 was so outrageous. I just was speechless.

21 These are people once worked with them.
22 These people, they are supposed to be my colleagues.
23 How can they possibly act like this?

24 Q. Was your item on the agenda for that day? Was it an
25 agenda item?

1 A. Agenda item, but it didn't say that I will take the
2 podium. I think they put at the end. Hours and hours
3 we talked about calculus courses. We talked all sorts
4 of jokes, and jokes, more jokes, and more jokes. I
5 just waited for a couple of hours till my turn comes,
6 and then I get up and I had to endure this treatment.

7 It's clear they are afraid of chairs. The
8 chair has powers, and if you don't think they can form
9 committees, they can celebrate. He can do it. There
10 is nothing you can do. Now only few people could
11 stand up. I told you it was to his face. They were
12 nowhere to be seen, then they got scared and it's not
13 that they don't want to talk. They want to talk in
14 behalf of me, and some of them just are scared,
15 because there is consequences in our department, and
16 the University does not enforce ethics, ethical
17 standards in our university.

18 Q. Were you -- let me just say -- strike that.

19 Do you recall Professor Promislow testifying
20 that there is no real way to rate mathematicians?

21 A. Yeah, he is wrong.

22 Q. Is there a way to rate mathematicians?

23 A. Of course. You always rate mathematicians. There are
24 metrics that you use. Number of papers written,
25 recent papers written, quality of journals they

1 publish, number of papers they produce.

2 Outreach. Outreach means that you can go all
3 over the world, all over the country and organize
4 conferences, involving other graduate students, other
5 faculty, just all sorts. So we have three ways you
6 can evaluate them. Research, teaching, outreach.

7 Then there are metrics we use. Citation,
8 you can log into a computer and check your Citation.
9 Mine is like maybe 12,000, okay.

10 But then there is other methods. You can
11 look at a Google Citation Index. The difference
12 between Amos and Google Citation, Google is the course
13 of anything ever in the paper posted. Amos is after
14 papers are published. So if you have to decide about
15 colleague, if he is active recently, Google Citation
16 very helpful, because it shows recent activity.

17 So my numbers are maybe like two or 3,000,
18 1,200 or something like this. There is an eight
19 index. There is a ten index. There are other metrics
20 that you could use, and then course evaluations, you
21 can read your course evaluations, and I cannot do
22 that.

23 I had an excellent course evaluation out of
24 Course 425. People just pretending. Course
25 evaluation, because you know these people, graduate

1 students, so it is more challenging to do a course
2 evaluation from others. In my case they disappeared.
3 They changed numbers on them in my 425, they changed
4 numbers.

5 So you can easily compare me and other
6 topologists in our department and others do geometry
7 in our department very easily. As you see, people who
8 sit in this courtroom, at least three of them, three
9 of them, maybe four, they show in personnel evaluation
10 performances, and I was shocked that you asking
11 questions about me. They say, Oh, we are how strong.
12 He is old. He used to be good and -- I mean, this is
13 a joke. There is a clear metrics you can measure
14 these people.

15 Q. Let's look at those metrics, Professor Akbulut. Are
16 you still researching?

17 A. I am really active in researching. He wrote in my
18 evaluation he does not have a current research grant.
19 I do. I have \$38,000 in my current research grant.
20 And I'm teaching. I'm heavily involved. I love
21 teaching, yeah. We all have these problems of getting
22 old, right?

23 Q. Sure.

24 A. So we have to go through this, and then we do our best
25 to be successful. You never rate person's age. You

1 rate him with metrics. A person gets Ph.D. age 50, we
2 call his number, his age is one. After Ph.D., then
3 you age, okay.

4 So this aging thing, every time they drop
5 it -- well, I mean, he is old. I mean, he used to be.
6 No, there is no used to be. Compare me to your
7 current research. My research, your research. My
8 number of papers, your number of papers, then you tell
9 me the metrics. This is a joke.

10 And these people, they also took my raise.
11 On top of it, he is saying that he is getting zero
12 days because he uses his server. In our opinion he is
13 too opinionated. He talks too much. He just,
14 unilaterally he decides. Year after year he gets zero
15 days. He just demands too much. This is the kind of
16 institute we have become.

17 Q. If you know, do you know how many students that took
18 your 996 class that was labeled as a reading class, do
19 you know how many of them received their Ph.D.?

20 A. They were five students took that class, and all five
21 of them received their Ph.D. from course material. I
22 can show you one-to-one response. If it looks very,
23 very -- it was an exercise in my book that I was
24 challenging people, can you do this, and Luke did get
25 a Ph.D. All five of them got Ph.D. I am very proud

1 of them. I never taught a class 24 all five Ph.D.s
2 graduated from this.

3 I could be taking grants. You can just look
4 at Google Scholars, 2005, forming like a skyscraper
5 because of these things, and two of them are here.
6 One is in the Rochester University, one is Harvard.
7 She just got invited to Harvard to give the same
8 course from the same course load. Those course notes
9 were published in Oxford University recently appear,
10 and Eylem was one. So what more can you do?

11 Q. So why do you feel like when Professor Promislow
12 testified he acted as if there was no way to judge
13 your status as a mathematician?

14 A. Because he doesn't know how to judge people. He can't
15 understand. Nepotism made him blind. He just decided
16 that George and Jim, whatever, is good. Then he asked
17 who is the most desirable position to be in? I don't
18 want to be talking about myself, but, I mean, it was
19 ridiculous. He said, just ridiculous, some junior
20 person and others, because he said what, how did this
21 happen?

22 Peller, who is scheduled to testify 4 p.m.
23 tomorrow, he went outside of the university, and when
24 he heard that they are trying to fire me, he launched
25 a round of petitions. One of them was best pitches of

1 the century. Another one is number one geometric
2 analyst. He asked them right there, this is what
3 happened through your colleague, right then, evaluate
4 them. The other one from Stanford, the world leader
5 in split geometry. Read their letters. They are
6 using metrics. They are telling how many papers are
7 produced, how many purists are produced. These
8 essential materials in the field. That's how you
9 judge them, not just this name, that name, because
10 they are your friends.

11 That's what you did exactly, Keith.

12 MS. DOUKOURE: I am going to ask Professor
13 Akbulut to look behind Tab T. T as in Tom.

14 MR. REIFENBERG: This is something signed by
15 him?

16 MS. DOUKOURE: I will try to elicit that
17 information.

18 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
19 this document?

20 A. Yes, I do recognize this document.

21 Q. Do you know -- I would like to identify the document
22 first. Do you know the date this document was
23 created?

24 A. I don't know. I found out about this, I was at
25 conference in Holland or Germany, from Keith

1 Weatherstreet (sp).

2 Q. Do you know about which month or year when this was
3 created?

4 A. So I was at Surbox (sp) Institute three, four years
5 ago. Relatively recent, not that old.

6 Q. You heard other people testify regarding the event in
7 the document, correct?

8 A. Yeah, yes. I mean, this is written by the chairs of
9 Tulane University. They have a distinguished
10 literacy. They invite distinguished mathematicians to
11 present their research, and I was informed informally
12 from the secretary they are considering me in writing
13 this distinguish lecture series. And then their
14 chair, Morris Kalka, only name appears there, he sent
15 an email to the department inviting me, intentionally
16 or unintentionally. This email got all over the
17 graduate students, and then graduate students found
18 out about this, and they told mathematician I know
19 from Tulane. I couldn't believe this happened. Then
20 I heard in Europe and Holland that such an email was
21 sent. When you say something to graduate students all
22 over the world, all over the world.

23 Q. This document was it created as an email or a
24 different kind of correspondence?

25 A. Yeah, this document is something I sent, a narrative

1 that I sent my own department. I sent the quotation
2 and site from his email.

3 Q. You sent it to -- just for clarification. I am not
4 trying to testify. You sent it to your own
5 department?

6 A. Own department. I would like to thank them, thank my
7 department for the occasion of such a high esteem of
8 me, and then I sent this.

9 Q. And what exactly was your -- what exactly are you
10 referencing in the document? What had happened?

11 A. Basically the chair, the narrationist, he asked MSU,
12 his old friend, a very well-known topologist. I know
13 who he is. There is only two people came from MSU who
14 is senior topologists. One senior topologist. We
15 have a senior geometrist who was the head of graduate
16 students. His name came up frequently.

17 There is two people working, advising that I
18 was being harassed. The first topologist, senior
19 topologist, is now retired. So he is basically, this
20 guy is soliciting information about me, because he is
21 about to invite me to the Distinguished Lecture
22 Series. He is saying this decision we'll be
23 discussing basically, and then Akbulut is the most
24 odious person. It will terrible if you invite him.
25 This document is all over the world.

1 Q. Did your impression indicate or does this document
2 indicate that that person also made judgments
3 regarding your qualifications?

4 A. Yeah, he said not qualified person.

5 Q. If there is no way to rate math professors as
6 Professor Promislow testified, would it be possible to
7 judge your qualifications?

8 A. It's not possible. I am known all over the world. I
9 am known in Tulane. I have people that I have joined
10 work in Tulane. It is intentionally impugning
11 reputation right now. It is a big shocker to me.
12 They know who I am.

13 MS. DOUKOURE: I move to admit this as FM-19.
14 FM-20.

15 PROFESSOR PROMISLOW: Objection. I would
16 like a date to understand what the word yesterday's
17 email means in the context of our discussions here.

18 MS. DOUKOURE: Their witness testified on
19 direct examination. My client had identified that.
20 This is in regards as to what their witness testified
21 to.

22 MR. REIFENBERG: Do we have any idea, gross
23 idea of when?

24 Q. (BY MS. DOUKOURE) Professor, would you have any idea?

25 A. I put this in my website, so there is a date in my

1 website. If I can go to my website, I tell you.

2 MS. DOUKOURE: I will hold this document in
3 abeyance. While we are on break, I will look up the
4 date and come back to the document, if that's okay
5 with the committee.

6 DR. PROMISLOW: Then I would have no
7 objection.

8 MS. DOUKOURE: Just for clarification, are we
9 still going to label it 20 when it comes back, or is
10 it going to have to be admitted? Okay.

11 Q. (MS. DOUKOURE) What impact, if any, did learning
12 about the statements made by former MSU people who had
13 sat on a confidential Abrogation of Duty Penalty
14 committee have on you?

15 A. I mean, now it's known all over the world. I mean,
16 they know. I mean, even if I don't say anything,
17 people write each other. I mean, this document, for
18 instance, just before I put in my web page, I found
19 out at a conference in Holland, and I was visiting
20 Germany, and they asked me what happened, what I did
21 and like this. So this is not good. If you are a
22 research mathematician, you want -- or any kind of
23 mathematician -- you want to connect with
24 mathematicians. This kind of question you shouldn't
25 have to answer.

1 One of the reasons I made documents on my
2 website, because I was sick and tired of answering
3 questions. I get so many emails, Selman, what did
4 you -- did you teach the course? Did you fight? Did
5 you, you know -- I mean, he spoke about incidents I
6 did that he ordered me not to talk. There was no
7 incident. Lie, complete lie, I can tell you this.

8 I just talking to secretary, Could you please
9 do my grants? And then I am listening email from him
10 that I almost attacked secretary. You yell.
11 Everybody heard you, and so I am preventing you ever
12 talking to secretary, but the secretary is someone
13 does my grants. No. Then he tells me third person to
14 intercept my secretary who supposed to do my grants.
15 This is the life I am living.

16 So at one point I decided I am going to write
17 every document about me, and I was really careful not
18 to write document myself about me. So all the
19 impugning documents about me, all the insulting
20 documents about me, all the penalty documents written
21 about me, I am going to put my website. I let the
22 world decide, because it is really hurtful for me to
23 answer these questions day in day out every time I go
24 home. Any time I go to university, I just tell them,
25 Just read this. Everything I know about my case in my

1 website, except my own opinions. Because if I put my
2 own opinions, if I did this -- I didn't do this -- I
3 wouldn't be believed. As you see, they are all
4 correspondence there too.

5 Q. And you are saying that -- are you saying that people
6 came to you asking you about certain events in the
7 math department involving you?

8 A. Constantly, and I don't want to answer, because it's
9 painful. If you go to rape victim, okay, first time
10 they can talk about it, but the fifth time, tenth,
11 there are steps to go through. How do they feel?
12 That's how I feel. I am academically raped. I don't
13 want to talk about this, but I have to talk about
14 this.

15 Q. And those emails in question came prior. Did they
16 come prior to you starting your website?

17 A. Relatively, yeah. Yes.

18 Q. How many people became aware --

19 A. Why would I spend so much time for me to put them in a
20 particular way? Because If I say somebody lied,
21 somebody is lying, I know if any instructor in it,
22 they can sue me. They can make my life miserable. So
23 I have to be hundred percent sure go through my
24 recordings and take the exact quotes and the right
25 quotes, but I didn't mince words. Everything I have

1 heard from Holland professor I put it there, because I
2 don't want to impugn other people's reputation, but at
3 the same time, they should not act like this.

4 Q. How do you believe that other people became aware of
5 what happened?

6 A. In math community if something is advanced, then
7 anything gets truth in, it's just like a fact and they
8 gossip quite a lot.

9 Q. Did you say gossip?

10 A. Gossip.

11 MS. DOUKOURE: I think it's break time.

12 MR. REIFENBERG: Okay. We are going to take
13 a ten-minute break, so be back at 4.

14 (Break taken 3:52 p.m. - 4:04 p.m.)

15 MR. REIFENBERG: Just one other thing.

16 Again, assuming that we go to another witness, are
17 there any other witnesses on your witness list that
18 are students?

19 MS. DOUKOURE: No, nobody else.

20 I am going to reask Dr. Akbulut the contents
21 of Tab 7 which we preliminarily marked. Tab T.

22 Keith, do you mind if I guide him a little
23 bit, like just provide a little background
24 information, because we already talked about this
25 document?

1 DR. PROMISLOW: I am happy for clarity of the
2 record wherever it may be found.

3 MS. DOUKOURE: Thank you.

4 Q. (BY MS. DOUKOURE) Professor, you have already
5 testified about this document, correct?

6 A. Yes.

7 Q. And this is the document you were testifying about
8 just before we broke regarding the distinguished
9 lecture series?

10 A. Yes.

11 Q. And information that was given by a former colleague?

12 A. True.

13 Q. Do you know the date that you sent this document as an
14 email?

15 A. Yes, March 27, 2017.

16 MS. DOUKOURE: March 27, 2017. Are we able
17 to admit the document?

18 DR. PROMISLOW: I have no objection.

19 MR. REIFENBERG: So I am assuming that this
20 was the things you talked about in terms of
21 information from somebody else was sometime close to
22 that date?

23 THE WITNESS: Yes.

24 MS. DOUKOURE: Yes, he has the date.

25 THE WITNESS: Somebody else's letters

1 February 8, 2017. I am quoting.

2 MS. DOUKOURE: I really am getting my steps
3 in today. This is FM-20.

4 MARKED FOR IDENTIFICATION

5 FACULTY MEMBER EXHIBIT 20

6 4:06 p.m.

7 Q. (BY MS. DOUKOURE) Professor Akbulut, I would like to
8 move now and talk to you about grants. If you can
9 recall, about how many grants did you have active in
10 October of 2014?

11 A. The document events, PDF, listed I think four or five,
12 and some of them are extensions, so there are three at
13 least. So I have technically like five grants.

14 Q. If you can recall, about how much money was available
15 in your grants?

16 A. Well, I mean, since one of the grants is Focus
17 Research Group grant, FRG grant, it involves several
18 colleagues and different universities, from University
19 of Minnesota, Stanford, VanDyke, et cetera. So we are
20 the lead institute, and I am the P.I. at that
21 institute, so I am overlooking here and there, because
22 it's very hard to -- there is another one, just my own
23 research grant. Is another one, research grant
24 department managing conferences I organize in Gokova,
25 Turkey, and that's for to spend for visitors come all

1 over the world, including our students.

2 But the one day I was frustrated. They were
3 telling me your grants are encumbered. Just walk into
4 Carolyn Wemple's office, Could you tell me just how
5 much money that I had at that time? And she went
6 through her records, and she gave me numbers which add
7 up to like \$85,000 available in grants. But then she
8 got really nervous, nervous, and then she wrote this
9 on MSU headers, formal letterhead, because want, I
10 demanded I need to use this in the future. You tell
11 me that, and then she had to consult her superior,
12 which is Beth Koivisto, who is a person who testified
13 this who -- she is a secretary, and then she went to
14 her office, and they were really nervous. Should they
15 give me this, should they not give me this? And I
16 told them, I demand it out and out. I will fight.
17 You have to give it to me. These are my grants. I do
18 demand these grants.

19 So they discuss among each other, and Beth
20 Koivisto said, Go ahead and give, and the letterhead
21 Carolyn Wemple wrote, showing total about \$85,000.

22 Q. And in the math department who, if anybody, would have
23 the best position to understand how much money of your
24 grant money was available?

25 A. If they don't -- I mean, they didn't look. They just

1 talked to secretaries. You cannot do this on hearsay.
2 You have to go to CGA.MSU and then look into them, and
3 I still carry all monthly balance sheets. Look at
4 them. It's clear they didn't look at them. I invited
5 all those five people that they could use my office.
6 Could you please come so I can show you my actual
7 amounts. All of them, except one, refused. You know,
8 it's over. We don't want to get involved.

9 One of them came to my office, and he was --
10 it looked like he was a bit of fear. He said, I am
11 sorry. I never got an answer for that in my life. I
12 don't know how to. I don't know how to. I didn't
13 check this. I signed this document without checking
14 it. About five signatures in this review report. I
15 can produce his name if you like.

16 There are others. The other one said, I am
17 in France. I cannot come. I told him I will wait. I
18 will be there Thursday. I will wait. I called him
19 Thursday. He said, I am not going to be in your
20 department. I can come to your house, show you. No,
21 no, don't come. Not for me. This is the plight I
22 get. This is the state of mathematician. It's not my
23 field. It's other field. I don't know why people
24 behave.

25 Q. Is there a definitive way to determine how?

1 A. Before -- there is one more thing. The other person
2 who testified here, Matt Hedden, came to my office.
3 In my office he took some voice recordings. I had
4 made a voice recording. I planned to make them good
5 documents. Maybe some day I write a book about
6 horrible experience, but I didn't organize it. I gave
7 him one of them. They are good tape, but I,
8 therefore, offered to give some documents.

9 He told me, Selman, I am supposed to
10 adjudicate your own case? We are not a grievance
11 committee. We are the people. Be honest with
12 documents. I was appalled, appalled. That's the time
13 he was telling me that I try to make you acceptable
14 department. Just imagine this young junior faculty,
15 only previous years I helped him to get a job, and
16 here, all of a sudden, he became like that person that
17 may be acceptable to turn to violence. In the
18 meantime, I became a monster, that he is making me
19 like a wild person. I had no explanation.

20 Q. Professor, is there a way to definitively say how much
21 money is available in a grant at any one time?

22 A. Time sheet. We have time sheets, because time sheets,
23 you know, grants, money goes here this student, that
24 source, that whatever. There is time sheets. I
25 provided you with some. And there is also a document

1 admission.

2 For instance, I know from Dave McKay (sp) and
3 my grant was totally encumbered. I know for a fact I
4 spent \$15,000. No problem. If it was too much, I
5 need to decrease it, because it was coming to August.

6 Q. That \$15,000 that you spent after they said your grant
7 was encumbered, was any of that money promised out at
8 the time that they said your grants were encumbered?

9 A. I never promised out my money. That was a discussion
10 with Taylor, what happens if you cannot finish your
11 grant? I told him I can spend it on visitor from
12 Japan, I can spend it on visitor from Japan, I can
13 spend on visitor from Iran and my grad student,
14 Kurry (sp), and I end up giving the Emily Center
15 5,000, and 8,000 to Covey (sp), because he needed the
16 most money by the time the department cut support. He
17 is almost finished his Ph.D. Department wants to
18 fight him, get rid of him. So I save basically his
19 life. I spend that money. He got successfully a
20 Ph.D. He is now South Carolina, someplace else.

21 So then I spend for myself. I got a couple
22 conferences. I made visit to California, Berkeley to
23 a conference, people in my field and my old advisor.

24 Q. When did you attend those conferences?

25 A. You mean the very last one in California, Berkeley? I

1 went to Berkeley.

2 Q. When did you pay for that conference?

3 A. In July or August of 2015.

4 Q. July or August 2015?

5 A. Yeah. The grant closing time is like towards the end
6 of August, so I have to hurry and I use this grant in
7 good faith. And then for student in spring, because
8 he needed badly, because department was kicking him
9 off the department. That was like in May, around May.
10 And a visitor decided -- he went through hell, because
11 going back and forth dealing with cheat. You should
12 never talk to people about grants.

13 If you have grants, you don't pretend like
14 you are giving, you know, little money to people,
15 throwing little money. This is very insulting. You
16 put third person between you and the person you are
17 helping. You just give instructions to your
18 secretary, and the secretary, they apply, and so that
19 there is no embarrassment factor. This is how much is
20 available, how much you get. You don't get into email
21 conversation, Akbulut will give me this. No, no, you
22 cannot get that. You don't talk like this. You have
23 a grant office deals with this kind of things.

24 Q. When you were here yesterday when Beth -- I think her
25 last name used to be Koivisto and is currently

1 Gagnier?

2 A. Gagnier.

3 Q. -- testified? You were here yesterday?

4 A. Yes, I was here.

5 Q. You heard her testify regarding a tweet that you sent
6 on Twitter, correct?

7 A. Yes.

8 Q. As a result of that tweet, what, if anything,
9 happened?

10 A. Well, I found out that someone from HR -- Eylem. I
11 took a close look, but Eylem told me she had talked
12 with lawyers, and then apparently someone from HR or
13 OIE investigation against Eylem and me. This is on
14 the basis of Eylem writing a tweet. No. Eylem
15 writing a tweet. I reply to a tweet. It is very
16 factual opinion.

17 I mean, I was honor school for a lot of
18 discretion. I know the principles, the principles you
19 do when you write messages online to public. You have
20 to be hundred percent sure not to impugn people's
21 reputation, not to directly insult, but don't hold
22 back. If you want to say something -- because you
23 have a little space, you know. At the time 140
24 characters, now 280, but you go to the point, and then
25 don't bicker. The only thing you should give, your

1 truth. If you didn't discuss your truth, never do
2 that. Because I see some people yelling at each other
3 insulting. I mean, you don't want to just yield, you
4 go to court for that information. Saying truth is not
5 defamation.

6 Q. Did you do anything on your tweet to ensure that
7 Ms. Gagnier would repeat that tweet?

8 A. If you give me that piece of my tweet, I can explain
9 to you. You refresh my memory.

10 Q. Sure. I think it was Charging Party document 64, I
11 think. 65.

12 MS. DOUKOURE: Charging Party 65, and I will
13 give you a cross-reference in one second.

14 MR. REIFENBERG: CP-65.

15 MS. DOUKOURE: 11 S. 12. 11 S., as in Sam,
16 12.

17 Q. (BY MS. DOUKOURE) Did I give it to you?

18 A. Yes. So now you can repeat your question.

19 Q. I am going to let everybody else find it first.

20 Professor Akbulut, do you recall this tweet?

21 A. Yes, I do.

22 Q. Did you do anything in this tweet to ensure that Beth
23 Gagnier would see this tweet?

24 A. No, I didn't do anything. I just tweeted my Twitter
25 page and then #MSU, because put MSU, that cover a

1 group of people trying to improve the university
2 image, that the university has problems, and then they
3 are the commonplace to be sent, some of us send their
4 tweets. We want to reclaim the honor of our
5 university.

6 Q. Did you intend for Ms. Gagnier to see this?

7 A. No, I didn't intend this. This is a -- hashtag is the
8 telling that group of people who are constantly
9 dealing with changing the image of the university.

10 Q. Was there a final investigative report issued
11 regarding the investigation into your tweet?

12 A. They take forever, forever, and they call me and they
13 call Eylem. Finally, like few days before, maybe week
14 before, we just got the finding report. Finding
15 report says it established that we did not violate
16 anti-discrimination policy of MSU. Completely similar
17 to Wolfson, except ours is positive that we didn't
18 violate.

19 MS. DOUKOURE: I am going to ask to use a
20 document that is not in your binder, and it is not in
21 your binder because it came out on August 14, 2019,
22 and was not available to be put in the binder before
23 August 2nd.

24 MR. REIFENBERG: Will we get a copy of it?

25 MS. DOUKOURE: I will give you a copy of it.

1 Q. (BY MS. DOUKOURE) Professor Akbulut, do you know what
2 this document is?

3 A. Yes, I know. This is OIE report about this tweet.

4 Q. And if you could read under the first paragraph under
5 the heading -- I am not sure of the heading -- labeled
6 as background and issues.

7 A. What was the word?

8 Q. Background and issues.

9 A. Read this?

10 Q. No, just the second sentence that starts out Valerie
11 Osowski. Can you read that. It's the second
12 sentence.

13 A. Okay. One of the associate communication director for
14 the College of Natural Science reported that on or
15 about September 17, 2018 Eylem Yildiz, Respondent
16 Yildiz, a graduate student, made a Twitter post about
17 Claimant. Selman Akbulut, Respondent Akbulut, a
18 professor of mathematics, was later identified as
19 re-tweeting Eylem Yildiz' Twitter post.

20 Q. That's fine. Thank you. Do you recall Beth Gagnier
21 testifying that she didn't know about this tweet until
22 this investigation started?

23 A. I don't know. I cannot read her mind, but I don't
24 believe her.

25 Q. Do you believe that she saw this tweet before it was

1 brought to her attention?

2 A. Probably.

3 Q. Can you read the summary of findings, please.

4 A. After the investigation and review of the available
5 evidence, the investigator has determined that the
6 preponderance of the evidence does not support that
7 respondent engaged in behavior that violated the
8 anti-discrimination policy. The investigation did not
9 establish that Respondents retaliated against
10 Claimant.

11 MS. DOUKOURE: I move to admit this as FM-21.

12 DR. PROMISLOW: No objection.

13

14 MARKED FOR IDENTIFICATION

15 FACULTY MEMBER EXHIBIT 21

16 4:26 p.m.

17 MR. REIFENBERG: So for finding this, we are
18 just going to give it a free-floating title and let it
19 sit in here someplace?

20 MS. DOUKOURE: We could call it the document
21 not in the binder.

22 MR. REIFENBERG: I just want to know.

23 MS. DOUKOURE: There are two of them. I
24 promise to identify and I am sure people will identify
25 it where you will be able to locate it in your binder.

1 Q. (BY MS. DOUKOURE) When this investigation started
2 regarding your tweet, how did that make you feel?

3 A. I mean, I don't know. There is problem with dates
4 there. I don't want to say something wrong, some
5 wrong dates, but I became, when she called me, she
6 sent me an email that she wants an interview with
7 lawyers. I think this is about the same time Eylem
8 called. Eylem called earlier. I remember the
9 interview, but I couldn't tell you dates.

10 Q. Was there ever an OIE report regarding the -- or the
11 event that was sent about you that's relayed in here
12 to the university?

13 A. None.

14 MS. DOUKOURE: I am going to hand everybody
15 one more document that is not in my binder. Trying to
16 keep things fresh around here. It is not -- for the
17 record, it was not in the binder because it was not
18 available at the time that the binders were due.

19 Q. (BY MS. DOUKOURE) Professor Akbulut, do you recognize
20 this document?

21 A. Yes.

22 Q. Can you identify it for us, please.

23 A. This is Natural Science Tenure System Faculty Annual
24 Evaluation Form.

25 Q. When did you receive a copy of this document?

1 A. Recently. You know, maybe over summer. I don't know.

2 Q. And if you are looking at Research: Strengths,
3 Weaknesses of Activities, Achievements, and
4 Recommendations section under in the first large box
5 titled research, is there anything about any of the
6 things in there that strikes your fancy?

7 A. Yeah, it strikes me, although research grant, which is
8 false.

9 Q. Do you currently have research grants?

10 A. Yes, I do.

11 Q. Do you know who in the university is responsible for
12 checking these documents for accuracy?

13 A. CNS. They are the College of Natural Science.

14 Q. Do you know who signs these documents as being
15 accurate?

16 A. Keith Promislow.

17 Q. Did you hear him testify yesterday that Dean Vasquez
18 is responsible for the accuracy of these documents?
19 Did you hear him testify to that yesterday?

20 A. Maybe.

21 Q. How much of a percentage of your income is research?

22 A. So the raises are given 40 percent for research, 40
23 percent for teaching, 20 percent for service. Service
24 definition, you know, service includes like all sorts
25 of other things. I mean, services could be committees

1 you serve. Since he never puts me on any committees,
2 I can't get credit for it, so only way I can use for
3 service is outreach, and I still am feeling great
4 because I have great outreach. I go to Brazil, I go
5 Turkey, I go Switzerland. This is called outreach, so
6 there is outreach that is ten percent, and 40 for the
7 teaching and research.

8 Q. Do you believe that -- strike that. Is there an
9 importance at the university in the math department
10 placed on being able to obtain research grants?

11 A. Please repeat.

12 Q. Is there an importance placed within the university
13 math department upon being able to obtain research
14 grants?

15 A. Very much so.

16 Q. Does a portion of the research grant go to fund
17 certain things, like overhead?

18 A. Yes. I thought the chief would know better 50, 60
19 percent. Almost half of it goes overhead. That means
20 the government pay this much money to the university
21 to help you with administrative costs.

22 In my case they help you to administer these
23 grants. This money for that, for instance, even
24 though everybody has office, they are charging me for
25 using my office because I am doing my peer ads in my

1 office, and I use university for overhead, that the
2 big part is having staff supposed to be helping me
3 using these grants, grant money, not obstructing it.

4 Q. If somebody has no grants, would they be rated as high
5 in the research area --

6 A. Let's look --

7 Q. I am sorry. -- as somebody who had active grants?

8 A. Yeah, people who have active grants respected more,
9 and we always apply for grants, unless you are so
10 famous, rich and famous you don't need to apply for a
11 grant. There are such mathematicians too.

12 Q. Is there an affect on how people view you as a
13 professor and mathematician from having a document
14 that says that you don't have any active grants?

15 A. Yeah, it is a lie. I mean, there are many documents.
16 People testified here. I used to be a good
17 mathematician. He was a good mathematician. He is
18 old. They kind of work in their minds that now they
19 best in the field. I am just some old guy on way out.
20 Unfortunately, that doesn't work for this, using these
21 methods I told you.

22 MS. DOUKOURE: I move to mark this document
23 as FM-22.

24 DR. PROMISLOW: No objection.

25 MARKED FOR IDENTIFICATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FACULTY MEMBER EXHIBIT 22

4:34 p.m.

MR. REIFENBERG: Apparently university does
very good research.

Q. (BY MS. DOUKOURE) Is what Professor Promislow signed
in your faculty evaluation regarding your grants true?

A. You know, I only take advice George Monteroso. You
know, I just talk to him maybe for a few seconds. He
is at Berkeley, a mathematician, famous in the field,
and I talk with him, and I talk with Kitch Law Firm.
And first thing he said, This is unfair. You should
be getting excellent. This is stupid, because he
knows. He is a topologist, everybody in my field, so
I thought that -- you know, I didn't think too far,
but he said this is most unfair part of this
evaluation.

Q. Is it true, is it true that you don't have any grants?

A. No. Yeah, I get that he writes I don't have any
grants, then he writes a teaching evaluation. I told
you the story about teaching evaluations.

Q. So is this the first time that Professor Promislow had
said something untrue about your grant money?

A. Many times.

MS. DOUKOURE: I have no further questions.

CROSS-EXAMINATION

BY KEITH PROMISLOW:

Q. You talked at length about an OIE finding against claimants Promislow, Wolfson, Schenker, and Kirkpatrick. Do you know the outcome of that finding?

A. There are several OIE reports. There is one about Promislow, Wolfson, Kirkpatrick. I told you there was Schenker.

Q. That's the one I am talking about.

A. And then the one we filed Peller and another one.

Q. I believe there was an OIE report filed against Promislow, Wolfson, Schenker, and Kirkpatrick with claimants Akbulut, Peller, and Vaninsky?

A. Okay. So that's most of them.

Q. Do you know that?

A. Yes, I know that.

Q. Can you tell me?

A. Galvin.

Q. Galvin. Was there a finding or no finding?

A. Okay. So the decision had been before. We already held it, and you kept asking after the report, and the person, attorney who was doing the report was Tracy Leahy, and then finally he sent me a message. He said he send support to OGC, Office of General Counsel, which is basically protecting administration to

1 review. I was appalled because he -- then when I
2 first went to the OIE I told him I cannot use your
3 services because I am disputing this. I already seen
4 these cases and what kind of contradiction happens in
5 university and working with university. How fair can
6 you be? They assured me, talking with Mr. Hofferma, n,
7 in terms of the Freasor one, which she now tells me
8 she was fired because of me on that report, because
9 she wants to protect from them getting fired.

10 This is no connection between investigation
11 altogether. They are completely different office, so
12 I can --

13 DR. PROMISLOW: Can I politely ask the panel
14 to instruct Professor Akbulut to answer the question.

15 THE WITNESS: Yes.

16 Q. (BY DR. PROMISLOW) My question is, Was it a finding?
17 Was it a finding or was there no finding?

18 MS. DOUKOURE: I am going to object, but I
19 think your question was was there a finding?

20 Q. (BY DR. PROMISLOW) Was there a finding?

21 A. I can't tell if there was a finding, because they
22 decided this is just faulty. They sent it to OGC, and
23 they have attorney-client relationship with OGC. As
24 soon as they said that, killed it, because if you have
25 dispute administration, you want them to investigate

1 administration, they are taking her report for
2 reduction.

3 Q. So you are disputing the process?

4 A. Well, it's not the process. Problem is she is also
5 fired now. I don't think Leahy is still around.

6 Q. I guess I am unclear what you are talking about. You
7 talking about the process?

8 A. This is the ending of this ordeal. Vaninsky, just
9 after he died and that report didn't have any concrete
10 thing, just telling the story. You think it was a
11 soft landing. It didn't blame and it did not have
12 harsh conclusion, but attorney told us, I have to send
13 that to OGC for reduction, or whatever, or for
14 revision of this report.

15 It's not fair. I don't want them send my
16 report to OGC. The Provost, Provost tells me, I want
17 to get rid of you. Resign. Retire. I don't want
18 your office to redact this report.

19 Q. So you are saying there was no finding, but you are
20 not happy?

21 A. I tell you, you look at the report. I don't know.

22 Q. It's true there was no finding, correct?

23 A. I don't know.

24 MR. REIFENBERG: That's your answer, you
25 don't know?

1 THE WITNESS: Yes, I don't know. Only that I
2 lost my interest in that report. It wasn't taken as a
3 report is what I said to you.

4 Q. (BY MR. PROMISLOW) So you talked for a while about
5 Luke Williams. He was your P.C. student?

6 A. Sure.

7 Q. And he graduated soon after --

8 A. Yeah, yeah.

9 Q. -- the cancelled class, but it was a statement, not a
10 question.

11 What, was Luke in his 8th year when he was --
12 in --

13 A. Not sure.

14 Q. -- October 2018?

15 A. Not sure.

16 He was a bright student. All I know, I
17 usually don't get good students that you think good
18 students, because after they have your name, students
19 come to graduate office, Wolfson, now Schenker and
20 Powers, they send -- they direct these graduate
21 students talk to this professor, don't talk to this
22 professor.

23 Before our policy was graduate students
24 should never be connected with advisors and they
25 should come and harvest all this knowledge at

1 university and chose the best mathematics they can.
2 But now grad students are telling me, you know, I was
3 told, Stay away from Professor Akbulut. Stay away
4 from Professor Ivano (sp) or McCarthy. That's what we
5 are told. Be good. Be good. I got this kind of
6 information from graduate student. How do I get those
7 graduate students? That's another reason for funding.
8 He was sent to work with Hedden that he couldn't --
9 Q. That was Luke Williams?
10 A. Yes.
11 MS. DOUKOURE: I am going to ask that my
12 client be allowed to answer the question. My client
13 is talking right now about Luke Williams. He was
14 saying, That's how I got the student.
15 MR. REIFENBERG: Can you tell us the question
16 you were asking about Luke.
17 Q. (BY DR. PROMISLOW) The question was, was Luke
18 Williams in his 8th year?
19 A. Don't know. I don't know.
20 Q. That's fine. And now the next question is, you said
21 several times that Luke didn't need any credit?
22 A. Didn't need any credit.
23 Q. Did you believe that he didn't need to take any
24 classes in order to graduate?
25 A. No. You don't understand. When you go to class, then

1 you can get credit, no problem. He is a student. He
2 is a distinguished student that we are giving him an
3 award, fellowship. Of course he can go in any class.
4 If he is lucky, then maybe he can get an award, such
5 as research grant.

6 So he wants to get involved with it. He
7 already know this time training requirements. You are
8 asking the kind of a question you only ask a first- or
9 second-year grad student. They have something about
10 taking requirements, about taking some classes. He is
11 on his way out. He is finishing.

12 Q. So did he need to take this class in order to prove
13 his thesis? Did Luke need to take this class in
14 order --

15 A. Absolutely.

16 Q. Hold that thought. Did Luke need to take this class
17 in order to complete his thesis work?

18 A. He absolutely needed the class. We all absolutely
19 needed that class. It's a good class. At the end of
20 this class you will learn there are spaces,
21 dimensions, fires and hires (phonetic) that cannot be
22 triangulated. This is an age-old problem. We are all
23 excited like crazy, and we are trying to figure out
24 the paper. This is a gold mine for a finishing
25 graduate student, because he will get papers from

1 this. He will get problems from this.

2 It is not like he needs -- he didn't get a
3 ticket to go into the movie. You are talking about
4 high level research, so he was excited to come to take
5 and participate in such a class, and I was excited,
6 because I have to surround myself with really smart,
7 enthusiastic students so I can go through this,
8 because I cannot do this by myself. There are so many
9 details, and I was really lucky that he helped me go
10 through breaking these things, this paper, and then
11 the paper came out, and now my book finished publish.

12 Technically, you can say he is good. Of
13 course, he is good. He could have just taken his
14 requirements. I could have just given him Ph.D. So,
15 I mean, Ph.D. or something, he can leave.

16 This is not the point. You want to get
17 distinguished research. You want to understand what
18 happened. Most mathematicians, they do beautiful
19 work. That's what makes mathematics interesting,
20 exciting, enable and about to find something new.

21 MR. REIFENBERG: I think he has answered the
22 question.

23 DR. PROMISLOW: I believe he has answered the
24 question.

25 Q. (BY DR. PROMISLOW) You said that Luke went four,

1 five, six times to graduate studies office, I believe?

2 A. To my office.

3 Q. I am sorry?

4 A. To my office.

5 Q. Where did he go four, five, six times? Was it to your

6 office?

7 A. Yeah, he is all the time complaining.

8 Q. I just wanted to clarify the record, because it wasn't

9 clear.

10 A. I'm not letting him cross-cross. He's complicated

11 himself. I always consult him, Don't go pay your own

12 money. I take care of it. I got tons of grants. I

13 go down, talk to Carolyn. Carolyn tells me no

14 problem, and then I tell Luke, Don't get anxious.

15 That's what happened.

16 Q. So did you talk about the department meeting of

17 May 5th, 2015? You said they did a motion, the spring

18 department did?

19 A. Yes.

20 Q. Did the motion read, Professor Selman Akbulut's course

21 Mathematics 996 in the spring of '15 was cancelled

22 inappropriately. As a result, his salary should be

23 compromised, is that correct? Is that reasonably

24 accurate?

25 A. I need to hear.

1 Q. Is that possible?

2 A. Whatever it is of interest, if you are reading, but
3 you have to show me.

4 Q. Maybe I can rephrase.

5 MS. DOUKOURE: I am going to ask him to let
6 my client finish answering before he starts talking
7 again.

8 THE WITNESS: You have to either give me the
9 document in front of me, check what you are saying, or
10 if you are reading from the document, then if I ask to
11 believe it, then it's okay.

12 Q. (BY DR. PROMISLOW) You can say you don't know as
13 well. Was the motion about the cancelled course? Was
14 the motion that you submitted about the cancelled
15 course?

16 A. Motion is written right in front of you. Give me the
17 document. I read the motion.

18 Q. So you are not going to answer my question?

19 A. I need the document. I don't want to leave something
20 out and say something accidentally. I want exactly to
21 read the motion. It's important.

22 Q. So you are saying you don't know then. Is that your
23 answer, you don't know?

24 A. I know it's written there. I need to refresh my
25 memory.

1 Q. I don't think --

2 MS. DOUKOURE: Keith, I don't want to stop
3 you, because I and the tribunal can make the decision,
4 but I don't feel like there is anything that would
5 prevent you from allowing him to read through a
6 document that you have in your possession.

7 Every document -- Ms. Kelley is advising you.
8 Every document is just to refresh memory and if you
9 are worried about having it admitted, that's an issue

10 DR. PROMISLOW: I don't physically have it
11 here. It's in a binder somewhere else.

12 MS. DOUKOURE: It appeared you were reading
13 off of something.

14 DR. PROMISLOW: I have an extract from it.

15 MR. REIFENBERG: I think we would agree with
16 that, that you can go ahead.

17 MS. DOUKOURE: I was trying --

18 DR. PROMISLOW: I appreciate it, I do, but
19 it's my lack of experience in those events.

20 Q. (BY DR. PROMISLOW) So if we agree that you submitted
21 a motion to the -- I am going to move that one.

22 JUDGE WHITBECK: Counsel, forgive me, but you
23 will have to speak up.

24 DR. PROMISLOW: I apologize.

25 JUDGE WHITBECK: Maybe it's my advanced age.

1 I am literally hearing about one word out of ten.

2 DR. PROMISLOW: Okay. I will try and speak
3 clearly into the mike.

4 Q. (BY DR. PROMISLOW) I would like to show you -- I
5 would like to hand you a document FM-8. I think it's
6 Binder Tab F.13, FM-8.

7 MR. REIFENBERG: Which? Their binder?

8 DR. PROMISLOW: FM, FM.

9 MS. DOUKOURE: You said Tab 13. I don't know
10 if we have Tab 13.

11 DR. PROMISLOW: I'm sorry. It says 13 up in
12 the --

13 MS. YERMAK: F.13.

14 DR. PROMISLOW: Page 13. I'm sorry. FM-8.

15 Q. (BY DR. PROMISLOW) Does this document say that your
16 class was cancelled because it only had four students
17 registered? Do those words appear, that class was
18 cancelled because it only had four students
19 registered?

20 A. Well, because they are not letting him in. They are
21 not letting Luke in, so class cancelled what I am
22 telling you here.

23 Q. So --

24 A. I am here to register for my 996 class. They are not
25 letting him in.

1 Q. I understand that.

2 A. So then because they are four people, you out.

3 Q. I am just trying to establish if you do agree that
4 there were four students registered on --

5 A. I have five students always. Always they were five
6 students. I say there were always five students from
7 get-go and there is this game going on. It should not
8 take place. It should not have taken place. If I
9 cannot spend my grant money to successful grad
10 students, who can I spend for? This game should end
11 at some of point. We shouldn't be going back and
12 forth. Four, five.

13 You know that in your heart you are wrong,
14 Keith. In your heart you know you are wrong. I can
15 tell from your face. I talk to you in person in my
16 office. You said no problem with the grant. You
17 wouldn't -- I wouldn't worry about one credit. You
18 talked to me personally. I recall this, but you are
19 so happy. You are laughing, you are chuckling. You
20 left my office. We'll see. I need to talk to the
21 dean. Why are you acting like this? I am sorry. I
22 am not supposed to ask the questions.

23 Q. Did you tell Luke Williams not to register at any
24 point?

25 A. Yes, all the time, not to pay money register. He did,

1 October 14. Override, it's called override. He did.
2 I recommended he should do override.

3 Q. After you explained that he couldn't do the override,
4 you could have told him to register --

5 A. No.

6 Q. -- anyway.

7 MS. DOUKOURE: I object.

8 DR. PROMISLOW: Could you --

9 MS. DOUKOURE: I object.

10 DR. PROMISLOW: Could you have not?

11 MS. DOUKOURE: I am sorry. I was waiting for
12 you. I object because it mischaracterizes testimony.
13 It assumes facts not in evidence. There is no
14 evidence of what Professor Promislow just stated.

15 DR. PROMISLOW: I am not even sure what I
16 just stated. Pretty tired here.

17 MS. DOUKOURE: He is assuming -- he is
18 mischaracterizing the testimony of my client. He
19 stated something that my client didn't state.

20 MR. REIFENBERG: Go ahead and ask the
21 question.

22 Q. (BY DR. PROMISLOW) Could you have told Luke Williams
23 to go and register and you will pay for the class
24 later?

25 A. Two questions. First one, did I tell Luke to

1 register? Yes, he did override, override being
2 October 14. It was before the deadline, but
3 afterwards he repeatedly came to me complaining they
4 are not letting me in. They are asking money. Then I
5 told you the story. I go down Carolyn, principal in
6 the grant office. I said, Carolyn, could you pay for
7 with the money they want? Professor Akbulut, don't
8 worry. It will be taken care of. Our grant is
9 telling us. So I go upstairs to Luke, Don't worry,
10 don't pay anything now. It's my grant is taking care
11 of is what Carolyn assured me. That's the correct
12 story.

13 Q. Is it Carolyn Wemple's job to make students register
14 for classes?

15 A. Yes, it's his job. His office is right next to the
16 office, and she said she would take care of it.

17 Q. Can she register Luke Williams?

18 A. You tell me. You are the one getting it.

19 Q. Don't think I am allowed to do that.

20 A. I cannot explain your job. I mean, you have Carolyn,
21 we have Britta, who is the junior secretary, right
22 next to each other. Carolyn is the senior secretary,
23 I will take care of it. Then for me it is finished.
24 Going to fine details who has what job description, it
25 is not my -- that's your job description. You are not

1 in this department.

2 Q. You and I had a conversation in your office after.

3 Do you recall the conversation?

4 A. Very much so, because I recorded it.

5 Q. Yes, you recorded it, so you can review it if you want
6 to?

7 A. Of course, all the time.

8 Q. Did I tell you that two other people had approached me
9 about reopening their classes, Seawei Wang (sp) and
10 Gang Bow (sp), and I had told them no?

11 A. I don't think so.

12 Q. But you wanted --

13 A. No, I listen to them. You said, I cannot, I cannot
14 help you or Papara's wife. Papara wants his wife to
15 have a job too, and I cannot help you, help one of you
16 out or help the other one. It's the exact discussion.
17 I said, Keith, are you crazy? Why are you comparing
18 me with Papara's wife. I am talking about proper
19 course. You are supposed to meet with me. I don't
20 know if you have some issue about Papara's wife
21 getting a teaching job. It has nothing to do with it.
22 You have to tell me. Yet in my office, if I help you,
23 then I help him. It doesn't work this way. Academics
24 doesn't work this way. Academia works in a metrics
25 system. Who can make more time? Keith, he served.

1 You don't say, I give you this and then I give the
2 other person. Completely disconnected issue. Maybe
3 later. There is no such thing. You don't do that.

4 You told me, Don't worry about grants. I
5 wouldn't worry about your grants. So you are assuring
6 me there is no problems. You are only telling me, Oh,
7 Luke should have been enrolled in 10th hour. I mean,
8 you are just playing with me.

9 At one point we talked and talked and talked.
10 I genuinely believed that you are convinced, but just
11 as you are leaving, you chuckled. You told me, you
12 lean towards me, you said, Professor Akbulut, what
13 would it mean to you if I cancel your class? What
14 would happen to you if I cancel your class? My reply
15 to you was, Keith, it will devastate me. It will be
16 humiliation for me. You chuckled. You chuckled. You
17 said, We will see about that, and then you left.

18 What is your decision? I have to talk with
19 Dean Kirkpatrick. You are up to no good. This was
20 the worst meeting in my life ever. This person
21 talking to me for hours, laughing between and asking
22 me about my research. People coming and insulting me
23 like this. After he said there is no problems,
24 nothing, and then you have to go to talk to.

25 Q. We had other meetings after that.

1 A. We have another meeting after that.

2 Q. I would like to hand you a document.

3 A. And what document?

4 Q. It's the last one of the day. I don't have the number
5 right in front of me. It was the one that was in both
6 binders. CP-57. It's also under H. Tab, in H. Tab in
7 the Akbulut binder, Tab 13.1A in the CP binder, and
8 also CP-57. It's the olive branch agreement.

9 MS. DOUKOURE: I am going to object to the
10 continuous characterization of a document that does
11 not have a title but he keeps giving it as attached to
12 giving testimony regarding the document, which he
13 could have done in the accusee testimony.

14 MR. REIFENBERG: We don't need a
15 characterization.

16 DR. PROMISLOW: Okay.

17 MR. REIFENBERG: Can you identify the
18 document without any kind of characterization?

19 DR. PROMISLOW: Sure. It's CP-57. It's
20 binder Tab H, and I will hand it to Professor Akbulut.

21 MR. REIFENBERG: Binder Tab H. in
22 Respondents.

23 DR. PROMISLOW: H. for Respondents and under
24 13.1A.

25 JUDGE WHITBECK: H.33, correct?

1 MR. REIFENBERG: Yes.

2 Q. (BY DR. PROMISLOW) Do you recall the meetings we had
3 in my office --

4 A. Of course.

5 Q. -- in the summer that led up to --

6 MS. DOUKOURE: You have to let him ask the
7 whole question, Professor.

8 Q. (BY DR. PROMISLOW) -- that led up to this email?

9 A. Yes.

10 Q. Do you recall those discussions?

11 A. Yes.

12 Q. There were at least two. I am pretty sure there were
13 two. They were almost -- how long were they, do you
14 remember?

15 A. Don't remember.

16 Q. An hour maybe? Maybe?

17 A. What emails?

18 Q. The meetings that we had.

19 A. Don't remember.

20 Q. You don't remember how long it took? Do you remember
21 negotiating on the language in this email?

22 A. I didn't think I was going to answer your question. I
23 think -- I thought that this was in October,
24 October 20, because he was saying that if appeal
25 process outline was wrong, because it's not in the

1 course of evidence. He basically said if that was a
2 three-person, process is done, so you clearly are
3 telling me that I was right all along, so I thought we
4 are making peace, that you are all things, you are
5 waiting, so I was happy.

6 Also though I am upset because I had to go
7 through all these things, all these years fighting
8 with you, so I decided I will let bygones be bygones.
9 I will go to his office. So I thanked you, and you
10 said, you told me that you would give me, you would
11 give me course reduction to make up for this misery
12 you put me through basically, right? In your meeting,
13 you said you were wrong by making me go through these
14 things.

15 Q. Did you take the course reduction?

16 A. Of course I did. And I was happy. I left thinking
17 that we are finishing. It was not a good experience
18 for me, but then called people, I send emails to
19 people, so everything is okay now. I don't have an
20 issue. Then I called you, I send the email. You said
21 no, no, no, this is completely different. You do an
22 Abrogation of Duty Penalty. This is just a course
23 reduction.

24 In your mind somehow you make some formula,
25 you give me this course reduction and then while

1 keeping me this very insulting penalty. I don't
2 deserve this.

3 Q. Did we mention the Abrogation of Duty Penalty while we
4 talked?

5 A. Of course. I take it back. We talked about
6 Abrogation of Duty Penalty. I have no idea. To me,
7 everything is finished. All the penalties are done,
8 done. So then I send you an email asking, by the way,
9 designating clean from my record. No, no, no. I
10 said, Are going to keep? I cannot do anything, except
11 some higher level penalty for you.

12 Q. At the end of the meeting did we agree that everything
13 was finished and the matter was settled?

14 A. Meaning that no Abrogation of Penalty implicit in it.

15 Q. Does it mention an Abrogation of Duty? Does it
16 mention? Does that document mention relief from an
17 Abrogation of Duty Penalty?

18 A. It doesn't. It clearly says, if the appeal process is
19 applied, then I would be able to find --

20 COURT REPORTER: Then I would be able to
21 find?

22 THE WITNESS: Not find, soon. Correct.

23 And you are the one who prevented me doing
24 appeal process and the grievance process. You turned
25 out. I trust. You turned out. Our department has no

1 grievance process. You are the keeper. You are the
2 one who decides everything.

3 So you promptly send outside of the problem.
4 So what grievance process are you talking in the
5 department? I am going to other side of campus asking
6 for grievance. He is sending me -- he is telling me
7 that lawyers will do this. I have to spend three
8 years of my life dealing with this, and then it's like
9 a game for you, and then you write with a straight
10 face, if the appeal process applied, I would have been
11 found right. What does that mean? What appeal
12 process are you talking about? Is there any door I
13 left unlocked?

14 Q. (BY DR. PROMISLOW) Do the documents establish an
15 outline for an appeal process for course
16 cancellations. Does it do that?

17 A. I don't know. I don't understand.

18 Q. Does the third point --

19 A. Third point.

20 Q. -- on the agreement attempt to establish an appeal
21 process for course cancellations?

22 A. I believe it's implicit. Abrogation of Penalty came
23 with that course cancellation. If you raise this,
24 other one has to be raised. It's not a joke. If you
25 did something correctly and then --

1 JUDGE WHITBECK: Lower your voice.

2 THE WITNESS: -- then you penalize person for
3 that action, then you correct it, then you correct the
4 penalty with it.

5 Q. (BY MR. PROMISLOW) Does the Department of Mathematics
6 have an ability to remove the Abrogation of Duty
7 Penalty?

8 A. I don't know. Administration all the way up, it's so
9 corrupt, including you. I don't know who overlooks
10 who. Who has a right to change what? That's the
11 problem at our university. I don't know what's
12 happening. Where is the appeal coming from? Where is
13 the grievance coming from in our department? Who does
14 these things? I have no idea. Every place I go, I
15 see your face. You decide.

16 And your friend, Jim Kirkpatrick, he is even
17 more authoritarian. He is so powerful that he can't
18 even bring himself to meet with me. So many times I
19 have to write, Jim, please could you share our
20 grievances? You are my dean. Can I at least dismiss
21 any of these case? No, no, you can't. He doesn't
22 answer to me.

23 So that I am with Terry Curry, which always
24 say, Oh, I will take care of such and such. He always
25 think they do, but the acting dean sits closer. They

1 take a yellow pad of paper. They take notes as I am
2 talking, as if they don't know what I am talking
3 about. They take notes, notes. We will take care of
4 it. They don't do anything.

5 This is not the way you run the university.
6 There is something called your metrics, your duties
7 and principles, and you listen, and then you decide.
8 It's not just a trick, you know, try to find a trick.
9 It's not a basketball game.

10 MR. REIFENBERG: Have you gotten an answer to
11 your question?

12 DR. PROMISLOW: I accept that as an answer to
13 my question, whatever it means.

14 JUDGE WHITBECK: You do or do not?

15 DR. PROMISLOW: I do accept it, yes. I am
16 going to ask another question.

17 MS. DOUKOURE: I don't want to complain, but
18 it is ten after five.

19 DR. PROMISLOW: Okay. There is another point
20 that -- can I ask one more? One more.

21 MR. REIFENBERG: You can always come back on
22 this tomorrow.

23 DR. PROMISLOW: If we are adjourned,
24 absolutely.

25 MS. KELLEY: So let's do it now.

1 DR. PROMISLOW: One question, and then we can
2 adjourn today.

3 MR. REIFENBERG: One focused question.

4 DR. PROMISLOW: One, yes-or-no focused
5 question.

6 Q. (BY DR. PROMISLOW) Did you refuse to teach your
7 assigned Math 124 class?

8 A. I did not refuse to teach my assigned class. I taught
9 my assigned classes. I did teach my assigned classes
10 given to me. I mean, I tell you this is completely
11 unacceptable for me.

12 Q. I accept that as an answer.

13 A. Yes.

14 JUDGE WHITBECK: I'm sorry. I don't know
15 what the answer is.

16 DR. PROMISLOW: That was a yes.

17 JUDGE WHITBECK: That he refused to teach the
18 assigned class?

19 MS. DOUKOURE: He testified that he did teach
20 the assigned class.

21 JUDGE WHITBECK: Okay.

22 MR. REIFENBERG: The class he taught in
23 substitution from the original. That's what you
24 found?

25 MS. DOUKOURE: I mean, his testimony was that

1 he taught the assigned class, and it was the class
2 assigned to him on that paper.

3 DR. PROMISLOW: But it was not Math 124.

4 THE WITNESS: According to you.

5 DR. PROMISLOW: Either it was Math 124 or it
6 wasn't.

7 THE WITNESS: According to you. I did my
8 assigned classes, written, my assignment given written
9 months before, and I fulfilled my assignments. I
10 refuse to tell anybody I didn't do my assignments.

11 MR. REIFENBERG: I think you got an answer.

12 DR. PROMISLOW: I am happy to adjourn. We
13 will reconvene Monday. No, Friday.

14 MR. REIFENBERG: Are you finished with this
15 witness, or not?

16 DR. PROMISLOW: No, no, no.

17 MR. REIFENBERG: Just clarification. So
18 tomorrow we come back to cross Akbulut at 9:30.

19 MR. SMITH: 9:30.

20 (Proceedings adjourned at 5:11 p.m.)

21

22

23

24

25

1 STATE OF MICHIGAN)
2) ss
COUNTY OF CLINTON)

3 I certify that this transcript, consisting of
4 171 pages, is a complete, true, and correct record of the
5 Dismissal for Cause Hearing and testimony taken in this case
6 on Thursday, August 22, 2019.

7 I also certify that prior to taking
8 testifying witnesses were duly sworn to tell the truth.

9 I also certify that I am not a relative or
10 employee of an attorney for a party or financially
11 interested in the action.

12 August 28, 2019



13 Connie S. Coon, CSR-2709

14 Notary Public
15 Clinton County, Michigan
16 My commission expires: 5-28-22.
17
18
19
20
21
22
23
24
25

Exhibits	81:13 138:15	2	23 79:23	3:22 111:10
Faculty Member Exhibits 1 - 22	12 83:11 138:15,16	2 29:8,9 97:6	23rd 60:15	3:28 114:23
#	12,000 118:9	20 27:22 95:9 97:15 126:9 131:5 143:23 164:24	24 77:10 78:24 121:1	3:52 129:14
#MSU 138:25	124 170:7 171:3,5	2005 121:4	25 72:23	4
\$	12:07 4:3	2013 4:25 5:21,23 25:4 76:23	26 83:15 84:4	4 67:2 84:14, 17 85:1,3,7 86:4 121:22 129:13
\$10,000 59:5	12:09 5:17	2014 6:19,21, 25 8:1,13 26:6 68:21 73:9,10 74:19 77:15 78:24 96:2,5, 20 97:15 131:10	27 83:15 130:15,16	4-manifold 5:20
\$15,000 63:3 64:2 77:2,7 135:4,6	12:10 5:17	2015 27:21 34:6,19,20 36:21 37:2,6 52:2,5,7,10 60:15 95:13, 16,19 96:7 97:18 98:1 107:15 136:3, 4 154:17	28 81:16	4-manifolds 35:23
\$2,700 74:2 77:23,25 78:6, 7 80:17	12:50 33:12	2016 4:25 80:8 98:2 111:1	280 137:24	40 116:6 143:22 144:6
\$3,000 88:7,8	13 5:22 74:12 84:1 157:9,10, 11,14	2017 130:15, 16 131:1	2:03 67:4	425 99:2 118:24 119:3
\$38,000 119:19	13.1A 163:7, 24	2018 140:15 150:14	2:10 70:15	496 97:17
\$5,000 54:14 58:3 60:3 63:7,13 64:10, 18,24 108:2	14 68:21,25 72:2 77:2 85:25 97:18 139:21 159:1 160:2	2019 4:2 139:21	2:14 72:21	4:04 129:14
\$6,000 67:11	15 5:8 17:3,4 64:3 68:13 73:9,10 91:15 154:21	20th 6:19,25 8:1,13 28:7,9 95:23	2:21 76:5	4:06 131:6
\$600 52:8	16 30:3 68:14, 15 96:25 97:2	21 141:15	2:26 78:16	4:26 141:16
\$85,000 132:7,21	17 5:2,4 70:17 99:9 140:15	21st 26:18 74:17 75:4 82:3	2:28 79:21	4:34 146:2
1	18 77:15 111:9	22 4:2 146:1	2:30 85:7	4th 29:21
1 97:6	19 93:21 114:20,22	22nd 81:25 82:2	2:31 81:14	5
1,200 118:18	1985 34:4		2:35 83:12	5 29:15,16 70:14 86:4
1/4-time 73:24	1992 35:13		2:36 84:2	5,000 53:24 57:19 63:4 64:5 77:3 135:15
10 5:8 53:25 64:3,4 79:20	1:32 55:17		2:40 86:1	50 103:25 120:1 144:18
10,00 64:5	1:33 55:17		2:49 91:16	57 109:2
10,000 57:18 63:3 64:4 73:6	1:35 56:24		2:58 97:3	5:11 171:20
10th 162:7	1:38 58:22		2nd 139:23	5th 154:17
11 15:11,12,15	1:42 58:22		3	6
	1:53 67:3,4		3 56:23	6 72:20 84:14, 17 85:1 86:4
	1st 80:8 111:1		3,000 118:17	
			30 71:8 96:20 98:13 116:6	
			31 78:19	
			34 61:4	
			34A 61:2,5	
			34B 61:2	
			35 55:14	
			37 42:3 69:11 70:1 71:8 81:6	
			3:03 99:10	

60 144:18	ability 39:3 168:6	143:12,18	adjudicate 59:24 100:11 134:10	Affairs 103:6
64 138:10	Abrogation 34:5 86:19 111:2 112:21 115:1 126:13 165:22 166:3, 6,14,15,17 167:22 168:6	accurate 30:15 96:16 143:15 154:24	adjust 17:14	affect 145:12
65 138:11,12		accusations 61:16	administer 144:22	affidavit 89:21 90:15
7		accusee 163:13	administratio n 147:25 148:25 149:1 168:8	affidavits 90:2,4,20
7 74:9 86:4 129:21	absolutely 152:15,18 169:24	Achievement s 143:3	administrativ e 144:21	afford 94:11
70 37:15	abuse 71:15 89:15 107:3	acknowledge s 107:20	admission 135:1	afraid 105:25 106:9 110:21 117:7
75 37:15	abusing 89:16	acknowledgi ng 80:19	admit 65:22 72:14 75:25 78:11 79:25 91:7,9 96:23 99:5 108:21 111:5 114:17 125:13 130:17 141:11	age 119:25 120:1,2,3 156:25
8	abusive 46:23	act 116:23 129:3	admitted 56:20 65:3 66:20 70:10 73:13 74:6 81:10 83:4,22 85:23 108:22 126:10 156:9	age-old 152:22
8 76:4 86:4 131:1	Academia 161:24	acted 121:12	admitting 66:2,4	agency 11:9, 11
8,000 77:3 135:15	academic 98:5	acting 158:21 168:25	ads 144:25	agenda 116:24,25 117:1
8th 150:11 151:18	academically 128:12	action 12:19, 21 18:14 30:14 168:3	advance 6:25 16:18	aging 120:4
9	Academics 161:23	actions 19:8	advanced 97:20 129:6 156:25	agree 81:1 156:15,20 158:3 166:12
9 78:15	accept 112:16,23 169:12,15 170:12	active 98:19, 20 118:15 119:17 131:9 145:7,8,14	advice 146:7	agreed 8:20 80:17
90 98:21	acceptable 134:13,17	activities 77:6 143:3	advise 40:15	agreeing 110:11
996 5:9,20 6:1 37:18 62:21 75:15 85:7 90:6,7 97:19 98:24 120:18 154:21 157:24	accepted 71:4	activity 118:16	advised 87:6	agreement 163:8 167:20
996-002 7:5	access 13:6 93:13,17 108:22	actual 133:6	advising 124:17 156:7	agreements 89:16
998 99:2	accidentally 155:20	add 12:24 132:6	advisors 150:24	ahead 13:21 74:4 75:2 87:16 132:20 156:16 159:20
9:30 171:18, 19	accommodat e 28:22 113:2	addition 23:14		Ahgat(sp) 46:2
A	accordance 110:11	additional 63:9		Akbulut 4:15, 18,23 6:4 7:4 8:4 15:5 25:13 33:5,6,16,17, 23,25 53:12 54:10 55:18 56:5,25 58:17 61:11 67:6
A-K-B 33:24	accounts 59:7	addressing 16:11		
a-n 33:23	accuracy	adjourn 170:2 171:12		
Abbas 45:18, 22 46:1 105:19		adjourned 169:23 171:20		
Abbas' 45:24				
abeyance 126:3				

68:16 70:17, 18 71:10 72:24 73:21 74:11,13 76:6, 14 77:11 78:18,20 79:22 80:2 81:16,17 83:14,16 84:5 86:3,5 91:4,17 93:20 94:4 97:5,7 103:23 107:6,9,21,25 108:9,12 109:6,10 111:12,13 114:24 119:15 122:13,18 124:23 129:20 131:7 136:21 138:20 140:1, 17 142:19 147:13 148:14 151:3 160:7 162:12 163:7, 20 171:18 Akbulut's 5:9,20 154:20 Algebraic 36:7 aligning 17:9 allegations 10:9 alleging 67:7 82:13,15 Allen 36:16 allowed 8:23 13:9 20:13,15 28:6 54:8 69:25 70:5 83:5 151:12 160:19 allowing 95:4 156:5 Alps 35:22 altogether 148:11 Amina 29:25 Amos 118:12,	13 amount 56:14 64:1 79:14 amounts 133:7 analysis 85:14 97:19 analyst 122:2 angry 42:1,4 82:9 Ann 32:24 Anne 73:4 103:6 announce 46:20 47:2,21 77:6 announced 41:16 42:22 Annual 142:23 answering 20:14 127:2 155:6 answers 20:16 anti- discriminatio n 23:8 139:16 141:8 anxious 154:14 anymore 55:5 101:7 104:6 anytime 101:20 apologize 60:11 156:24 apology 90:23 appalled 41:18 61:13 134:12 148:1 apparently 7:1 60:9 76:20 94:13 137:12	146:3 appeal 108:3, 7,8,16,18,19 115:20 164:24 166:18,24 167:10,11,15, 20 168:12 appealed 108:5 112:7 appeared 156:12 appearing 58:15 appears 80:1 123:14 applied 27:11 63:15 166:19 167:10 apply 26:8,10, 21 27:16 28:13 33:10 47:3 66:10,12 71:16 136:18 145:9,10 Appointed 31:11 approached 161:8 area 44:18 145:5 arises 77:24 arranged 16:24 arrive 53:9 articulated 18:3,6,8 Asadi 54:16 55:1 56:2,5,13 57:4 58:24 59:2,6 63:8,9 64:24 76:18 77:3 Asadi's 57:2, 13 58:3 63:15 asks 9:11 assertion	96:14,16 assign 51:12, 13,21 assigned 17:9 87:9 98:20 106:12, 13 170:7,8,9, 18,20 171:1,2, 8 assignment 46:11 87:14 114:6 171:8 assignments 28:6 97:14,21 171:9,10 assist 51:12, 16 assistance 63:10 73:24 assistant 73:5 assistantship 80:18 associate 6:9 92:1,23 93:16, 24 94:15,18 98:14 106:15 108:10 114:12 140:13 assumes 159:13 assuming 66:25 76:12 89:2 129:16 130:19 159:17 assured 148:6 160:11 assuring 162:5 atmosphere 101:8 atrocious 51:14 94:17 98:14 100:25 102:25 attached 163:11	attacked 127:10 attempt 167:20 attempted 105:9 attempting 102:19 attend 6:11 35:24 135:24 attended 36:23 attention 51:9 141:1 attorney 58:7 59:4,21 61:16 147:22 149:12 attorney- client 148:23 August 4:2 73:9,10 74:1 77:2,15 97:15 107:15 135:5 136:3,4,6 139:21,23 authenticate d 66:7 author 66:16 authoritarian 168:17 authority 30:23,24 31:17,20 32:2 authorized 11:10 102:10 award 152:3,4 aware 7:24 8:9 27:20 29:11 128:18 129:4 B back 48:18 87:23,24 88:10 89:18
---	--	--	---	--

103:19 108:23 109:4 113:24 114:1 126:4,9 129:13 136:11 137:22 158:11 166:5 169:21 171:18 background 129:23 140:6, 8 bad 46:22 60:8 88:7 badly 49:25 136:8 balance 133:3 bar 43:16,17 44:1 bargaining 84:20 Barnhart 36:17 based 63:23 64:22 basically 74:22 79:1 84:7 94:9 95:7 98:4,19,21 109:16 124:11,19,23 135:18 147:25 165:1,12 basis 9:18 21:4 28:21 67:7,9 89:2 137:14 basketball 169:9 bathroom 33:7 bathrooms 89:14 beautiful 153:18 beginning 19:15 44:2 46:8 47:10 50:11,14	64:15 67:10 82:19 98:12 behalf 54:5 117:14 behave 133:24 behavior 141:7 believed 28:3 128:3 162:10 belongs 9:5 benefit 35:8 52:16 Berkeley 135:22,25 136:1 146:9 Beth 80:4,11, 25 132:12,19 136:24 138:22 140:20 bias 30:18 bicker 137:25 big 68:10 104:18 114:10 125:11 145:2 biggest 64:25 Bill 87:19 binder 15:3,4, 5 79:25 107:7 111:12 139:20,21,22 141:21,25 142:15,17 156:11 157:6, 7 163:7,20,21 binders 109:5 142:18 163:6 binding 100:1 114:15 biology 71:13 bit 17:7 105:20 129:23 133:10 blame 149:11 blind 121:15	blocked 8:3 blog 106:19 blogs 109:24 boat 33:24 book 106:6,8 120:23 134:5 153:11 books 35:17 48:8 Bow 161:10 box 143:4 branch 163:8 Brandeis 34:24 Brazil 36:8 144:4 break 65:21 67:4 126:3 129:11,13,14 breaking 153:10 brick 37:10 bright 150:16 bring 48:18 87:21 168:18 Britta 15:20 68:22 160:21 broke 130:8 brought 43:10 52:25 141:1 buddy 102:13 buff 106:10 bully 51:6 bullying 51:4 109:18 bunch 44:4, 15 bygones 112:17 165:8 bylaws 39:13, 15 44:10,11	C C-329 84:18 calculus 117:3 California 77:5 135:22, 25 call 4:10,17 33:5 54:12 59:25 61:17 88:23 93:15 99:13,16 114:1 120:2 139:12,13 141:20 called 36:11 65:7 71:11 92:7 98:15 99:12 100:17 111:20 112:10,11,24 133:18 142:5, 8 144:5 159:1 165:18,20 169:6 calling 36:21 101:9,10 calls 36:12 112:11,12 campus 11:10 34:10, 11 57:9 167:5 cancel 8:2,5, 6,15 15:23,24 17:22,24 36:12 47:22 95:10 96:15 162:13,14 cancellation 18:4,5 26:10 29:20 46:9 48:3,11 103:5 113:23 167:23 cancellations 13:25 167:16, 21 cancelled 7:13,25 8:10,	12,20 9:8,18, 20 29:19 75:17 90:5 94:25 95:23 96:2,11,21 150:9 154:21 155:13,14 157:16,18,21 cancelling 18:7 52:9 95:3 96:1,6 cancer 104:20 105:8 candidate 41:12,17,24 43:8 44:3,5,6 46:3 candidates 41:13 43:1,2 47:4,9 capable 10:12 64:16 card 56:3 care 80:24 154:12 160:8, 10,16,23 168:24 169:3 careful 56:16 127:17 Carolina 135:20 Carolyn 55:22 57:1 58:5 67:19,24 68:1 69:7 73:4,11 74:1, 22 75:3,10 76:11,14,22, 24 77:17 78:5 80:5 93:11 132:4,21 154:13 160:5, 6,11,13,20,22 Carolyn's 93:12 carry 133:3 cart 67:11 case 11:13
---	--	---	---	---

12:24 53:17 69:14 74:2 77:23,24 80:20 94:19 98:24 113:1, 16 119:2 127:25 134:10 144:22 168:21	115:21 116:2, 10,12,13 117:8 123:14 124:11 Chairman 57:6 chairs 41:5,6, 7,10,17 53:21 87:10 101:18 109:21,25 117:7 123:8 challenge 99:1 challenged 46:14,16 challenging 119:1 120:24 chance 8:2,7 26:22,24 39:12 86:23, 24 115:8 change 17:23 18:10,11 26:3, 17,25 28:6,15, 23 29:22,24 32:5 39:19,20, 21 54:23 100:14,15 102:10 104:20 168:10 changed 9:6 26:19,25 28:9 39:10,11 40:14 119:3 changing 16:19 17:12 18:12 27:6 28:21 41:4 55:5 100:13 106:16 139:9 characterizati on 163:10,15, 18 characterize 30:10 48:22 49:1,21 86:8 101:12,13 115:2,5 characterized	49:18 characters 137:24 charge 87:15 97:14 charged 88:7 charging 20:20 25:3,12, 24 66:3,7 82:12,14 108:23 138:10,12 144:24 cheat 136:11 check 118:8 133:13 155:9 checking 133:13 143:12 chemistry 71:12 chewing 60:10 chief 144:18 children 105:22 106:3 China 38:20 choice 94:24 choosing 50:6 chose 94:13 95:5 151:1 chuckled 162:11,16 chuckling 158:19 circle 15:16 circulating 103:15 circumstance s 12:15 Citation 118:7,8,11,12, 15 citations 52:4	claimant 11:13 140:17 141:10 claimants 147:4,13 claims 57:17 93:17 clarification 60:13 80:12 84:24 124:3 126:8 171:17 clarify 10:17 22:15 23:3 59:14 154:8 clarity 130:1 class 6:1,3 7:5,12 8:3,6, 16,19 9:1,4 14:21,22 15:21,22,23, 25 17:19,20, 24 28:25 30:1, 2 31:21 68:4 69:12,18 70:24 71:10, 19 74:23 75:15,16 76:15 78:4 81:20,21,23 89:22 90:11, 13 96:5,6,15, 21 97:20 99:1, 2,3 103:4 107:21 120:18,20 121:1 150:9 151:25 152:3, 12,13,16,18, 19,20 153:5 157:16,17,21, 24 159:23 162:13,14 170:7,8,18,20, 22 171:1 classes 6:22 9:8,17,21,22 14:8,13 17:13, 17,22 25:13, 16,18,19,20 26:4,11,15 28:16,21 29:22,24 81:7	95:16,19,22 96:1,2 99:4 151:24 152:10 160:14 161:9 170:9 171:8 classical 106:10 clean 89:14 166:9 clear 92:14 102:2 117:7 119:13 133:4 154:9 click 98:7 client 66:17 125:19 151:12 155:6 159:18, 19 close 5:8,13, 14 130:21 137:11 closed 58:15 closely 82:21 closer 53:9 168:25 closest 82:20 closing 82:1 92:17 136:5 CNS 93:11,16 94:1,3 109:21 110:1 114:16 143:13 colleague 106:20 115:20 118:15 122:3 130:11 colleagues 101:1 104:19 116:22 131:18 colleagues' 57:16 collect 47:4 college 50:23 69:20 71:12 79:6 92:4 93:10 94:1 140:14 143:13
--	--	---	---	---

colleges 99:23	compensated 56:7	computer 118:8	12:12,13,15, 20 13:15,20 18:18,19,20 19:5,6,11,22 32:23 61:9 126:13	contents 55:9 73:2 74:21 77:16 78:25 110:12 129:20
comfortable 46:5 101:7	compete 47:19	computers 93:13		contested 52:24
commend 43:18,22	complain 32:7,9 169:17	concluding 23:7	confidentialit y 13:3 20:5	context 13:24 62:17 66:15 73:19 125:17
commitment 47:5 107:23	complainant 12:18	conclusion 20:4 66:21 112:25 149:12	confused 84:22 85:2	continue 72:12 89:19
committed 49:8,9	complained 20:11 32:14	concrete 149:9	congratulate 40:24,25	continuous 163:10
committee 42:19,22,24 46:18 103:5,6, 7,13 112:13, 14 113:4,8 126:5,14 134:11	complaining 10:21 30:13 69:3 80:10 154:7 160:3	concurs 86:18	conjunction 36:17	contractual 89:10,15
committees 103:18 117:9 143:25 144:1	complaint 59:17 62:21	condition 36:2 39:7	connect 126:23	contradicting 80:15
commonplac e 139:3	complaints 50:20 103:1	conduct 11:10 65:25 109:22	connected 37:1 150:24	contradiction 63:19 81:3 148:4
commotion 116:4	complete 8:23 69:22 90:13 94:15 116:17 127:7 152:17	conducted 102:15	connection 148:10	contrary 94:17
communicati ng 115:12	completely 6:13 27:17 64:6 85:8 104:3,5 114:13 139:16 148:11 162:2 165:21 170:10	conducting 10:8	consent 9:6	contributions 98:15
communicati on 49:16 107:24 140:13		conference 6:15 34:14,25 35:5,7,10,19, 25 36:1,5,15, 22 37:21 38:3, 6,7 74:1 77:5 78:2 92:20 122:25 126:19 135:23 136:2	consented 9:6	conversation 59:1 76:10 104:22 136:21 161:2,3
communicati ons 52:24	completion 70:25 71:1 74:3 77:18 79:2,5	conferences 6:12 34:9,10, 12,13,16,17, 18 35:1,8,11, 15,17,18,19, 20,23 36:3 37:1 38:9,11, 16,25 39:1 40:5,8 43:5 44:5 118:4 131:24 135:22,24	consequence 24:6 65:14	convince 36:14
community 129:6	complex 14:25 17:15 85:14 97:19 99:2		consequence s 65:18 117:15	convinced 104:15 162:10
companies 42:9	complicated 154:10		Constantine 58:12	cooperated 11:20,24 34:14
company 42:9,10 43:14, 21 103:10	comply 54:11		constitution 96:13	cooperating 12:6
compare 101:8 119:5 120:6	compound 12:2	conferencing 94:9	consulate 63:12	copy 11:16 60:2 139:24, 25 142:25
comparing 161:17	comprehensi ve 106:8	confidence 9:2	consult 41:7 132:11 154:11	copying 87:22,23
compensate 108:11	compromise d 154:23	confidential	contact 85:4 86:17 98:1	correct 11:25 13:19,25 14:1 25:14 51:10 55:15 56:13 57:5 107:12,
			contained 55:21 91:1	
			content 80:9	

18 123:7 130:5 137:6 149:22 154:23 160:11 163:25 166:22 168:3	97:16,17,18 98:18 99:3 101:1,2 105:1 113:22 117:3	criteria 107:25	date 18:11 29:14 69:1 73:7 74:16 76:7 77:14 78:23 80:7 96:19,20 110:25 122:22 125:16,25 126:4 130:13, 22,24	15 48:5,6,7 51:19 59:18 72:6 86:9 92:2,23 93:16, 24 94:15,18 102:8,9,10 111:20,24 114:12 143:17 158:21 162:19 168:20,25
corrected 54:24	court 5:11 33:13 58:9 138:4 166:20	criticism 49:11	dated 60:15 68:21	dean's 57:8 93:16 102:11 109:21 115:13
correction 60:1	courteous 50:10	criticize 110:19	dates 142:3,5, 9	deans 110:1
correctly 23:3 31:5 167:25	courtroom 119:8	criticizing 43:21	Dave 135:2	December 111:1
corresponde nce 123:24 128:4	cover 30:12 56:2 73:21 138:25	critique 100:24	day 17:1 29:20 53:9 54:3 65:10 68:1 81:25 83:20 92:19 104:21 116:24 127:23 132:2 134:5 163:4	decide 9:4 101:18 118:14 127:22 168:15 169:7
corroborates 90:21,24	coverage 55:12 63:16	cross 4:5 171:18	days 17:2,3,4 20:22 47:9 96:21,22 120:12,15 139:13	decided 72:9 88:23 103:10 113:7 114:11 121:15 127:16 136:10 148:22 165:8
corrupt 168:9	covered 56:6 76:9	cross-cross 154:10	DCF 79:7 80:19 81:4	decides 49:13 120:14 167:2
corruption 100:4	Covey 135:15	cross-examination 4:7,8 25:3,24 28:2 147:1	deadline 6:25 26:17 27:22 68:2 69:9 73:10,22 75:4, 6 82:13 96:1 160:2	decision 18:18 32:12, 21,22,24 45:18 72:7 92:8,12,13 93:3,4 95:6 103:20 108:11 124:22 147:20 156:3 162:18
cost 108:2	CP 108:25 163:7	cross-examine 13:10 90:16	deadlines 26:17	decrease 135:5
costs 144:21	CP-57 163:6, 8,19	cross-reference 138:13	deal 38:18 68:10 110:2 114:10	deepens 50:19
Counsel 147:24 156:22	CP-65 138:14	crushed 44:1	dealing 110:1 136:11 139:9 167:8	defamation 138:5
counselors 87:25	crazy 51:23 67:9 77:6 101:17 113:15,17 115:15 116:11 152:23 161:17	crying 40:2 100:9	deals 46:22 68:9 136:23	default 97:25
count 9:24	created 39:5 47:1 62:18 64:2 67:9 122:23 123:3, 23	culprits 110:1	dealt 28:20	definition 143:24
countless 48:12	credit 56:3 69:12,19 70:6, 7,8 77:21 79:7 80:15,16 144:2 151:21, 22 152:1 158:17	current 119:18,19 120:7	dean 44:7,19 46:13 47:10,	
country 44:4 63:5 118:3	credits 68:11 69:14 71:13 74:3 77:22 79:14	Curry 18:19 86:12 87:13 89:18 103:7, 12,14 168:23		
couple 46:19 49:8 88:10,12, 22 93:12 105:18 117:5 135:21	crimes 100:7	Curry's 48:15		
courses 5:2,4 7:25 8:9,11,12 14:5,7 16:17, 18,22 18:7 25:5 28:7,10 69:25 79:4,6,9 81:4,7 82:20 84:13 85:11, 15,18 86:25 87:1,4,5,7,11 89:14 95:12		cushion 5:16		
		cut 135:16		
		D		
		daily 57:20		

definitive 133:25	13 154:16,18 161:1 166:25 167:5 168:5, 13	development s 37:4	discourse 57:3	distinguishe d 38:5,21 123:9,10 124:21 130:8 152:2 153:17
definitively 134:20	Department's 63:14	device 49:16	discretion 137:18	distribution 30:17
degree 69:15	departmental 85:2	devoted 102:1	discriminate d 31:16,22 32:1 104:8	diverse 46:23 47:1
delivered 36:6	departments 42:11 50:18 99:15,22	died 104:19, 20 105:8 110:9 149:9	discriminatin g 45:2	diversity 39:16 46:16, 20
demand 110:20 132:16,18	deposition 36:16 61:17 88:1,2,9	difference 80:18 101:12, 14 118:11	discriminatio n 10:4,9,16 11:11 18:15 109:18	divorce 101:25
demanded 132:10	describe 38:15 70:22 73:2 90:8 97:12 109:13	difficult 51:16 53:16 60:10	discuss 41:21 90:4 110:21 132:19 138:1	document 15:17 42:14 55:8,19,21,22 56:9,17 60:8 61:12,14,15, 20,21,22,23 62:11,18,20 63:7 65:24 66:7,9,18 68:13,17,19, 20,24 70:17, 19,21,22,24 72:23,25 73:7, 11,19 74:11, 14,16,21 76:1 77:9,10 78:18 79:23 80:3 81:16,18,19, 24,25 82:23 83:14,17 84:4, 6 86:3 92:11, 12 93:20,21 94:5 97:6,12, 22,23 98:6,8 107:10,12,14, 15 108:15,21, 24 109:11,13, 16 110:5,11, 12,25 111:14, 15 122:19,20, 21,22 123:7, 23,25 124:10, 25 125:1 126:2,4,17 127:17,18 129:25 130:5, 7,13,17 131:11 133:13 134:25 138:10
demands 120:15	describing 4:14,18	difficulty 51:25 52:12 53:18	discussed 37:3 107:12 109:24 110:13	
demeaning 105:14,16	description 15:19 160:24, 25	dimensions 152:21	discussing 124:23	
denied 82:1, 4,5,24	deserve 74:5 83:21 166:2	Dinesh 105:19	discussion 57:3 58:15 73:15 135:9 161:16	
denying 108:6	deserving 102:1	direct 24:6 33:19 100:10 125:19 150:20	discussions 41:8 125:17 164:10	
department 14:3 18:9 21:2 31:7 38:17 39:4,11,14 43:15 44:21 45:10,11 47:13,24 48:21 49:1,2, 17,21 50:21, 22,25 51:5 54:17 56:8 57:3,14,21 58:8,10 59:2,5 60:3 65:1 80:5 85:5 88:25 89:1 96:17 99:14,20 101:10 103:24 105:21 106:7 107:20 109:19 113:25 114:5 115:4,25 116:1 117:15 119:6,7 123:15 124:1, 5,6,7 128:7 131:24 132:22 133:20 134:14 135:16,17 136:8,9 144:9,	designating 166:9	directly 9:12 137:21	dismay 44:24	
	desirable 121:17	director 140:13	dismiss 168:20	
	destroy 27:13	disagree 9:19 21:4 81:1	dispute 72:10 91:23 148:25	
	destroying 45:9	disappeared 119:2	disputing 148:3 149:3	
	details 153:9 160:24	disappointed 43:9	disseminate 53:20	
	determine 133:25	disciplinary 18:14 19:3,8, 10,20	disseminated 13:1	
	determined 104:13 107:24 141:5	discipline 21:3,21,24 22:9,12,16	dissertation 70:25 74:3 77:18 79:2,5	
	devastate 162:15	disciplined 21:7 22:10 34:6	distinguish 123:13	
	develop 39:3	discloses 12:21		
	development 37:6 38:1	disconnected 162:2		

139:20 140:2 141:20 142:15,20,25 145:13,22 155:9,10,17, 19 156:6,7,8 157:5,15 163:2,3,10,12, 18 166:16	68:15,16 70:16,18 72:14,17,22 73:12,16,20 74:6,10,13 75:25 76:6 78:11,17,20 79:16,22,25 80:2 81:9,15, 17 83:3,7,13, 16,22 84:3,5 85:22 86:2,5 90:18,24 91:4, 9,13,17 93:19, 24 94:3,4 96:23,25 97:4, 7 99:5,7,11 109:3,9,10 111:5,11,13 114:17,20,24 122:12,16,18 125:13,18,24 126:2,8,11 129:11,19 130:3,4,16,24 131:2,7 138:12,15,17 139:19,25 140:1 141:11, 20,23 142:1, 14,19 145:22 146:5,24 148:18 151:11 155:5 156:2, 12,17 157:9 159:7,9,11,17 163:9 164:6 169:17 170:19,25	duties 169:6 duty 34:5 35:4 86:19 111:2 112:21 113:14 115:1 126:13 165:22 166:3, 6,15,17 168:6	email 7:3,12, 16 15:20 16:11,14 23:9 29:14,15,21 52:22 54:25 55:4,22,23,25 57:1 67:24 68:1 72:8 75:21 76:7,11, 17,22 77:12, 14,16 78:5,21, 22,23,25 80:4, 7,9,25 81:1 92:12,25 96:19 98:1,6 107:19,20 108:14 123:15,16,20, 23 124:2 125:17 127:9 130:14 136:20 142:6 164:8, 21 165:20 166:8	76:23 77:7 93:8,18 94:12 132:3 135:3,7, 8 encumbranc e 76:21 end 19:14 59:21 116:6 117:2 135:14 136:5 152:19 158:10 166:12 ending 149:8 endure 117:6 enforce 117:16 engage 10:18 engaged 141:7 English 53:10 85:5 enroll 14:13, 16 83:6 94:13 enrolled 17:13 29:25 82:13,16 83:1 162:7 enrolling 16:23 17:17 enrollment 15:22 17:10, 11 26:3 ensued 108:13 ensure 138:6, 22 enter 68:3 entered 62:11 enthusiastic 153:7 enthusiastica lly 92:25 entire 66:12 entirety 70:21 entitled
documents 66:8 86:6,8,9 87:21,22,24 92:10 97:8,10 113:6,18,20 116:13 127:1, 19,20 134:5,8, 12 143:12,14, 18 145:15 167:14 dollars 52:6 68:8 69:5 74:25 75:16 76:13 77:4 Donahue 87:18,19 88:23 103:7, 12 Donahue's 88:10 door 48:9 79:11 106:11 108:3 167:12 doors 48:5 84:14 DOUKOURE 5:15 7:14,20 8:22 10:11,19 12:1 13:11,17, 19,22 14:10 15:6,9,11,13 19:12,23 20:9 21:8,14 22:6 24:22 25:2 33:1,4,9,11,20 55:13,15,18 56:19,25 58:19,23 59:11,13,15 60:17,22 61:1, 6,10,11 62:2, 7,10,16,17 66:1,6,24 67:6	draft 52:4 111:22 drain 87:4 drop 95:7 120:4 dropped 15:22 dropping 17:12 drops 17:24 due 142:18 duly 33:18	E e-mailed 68:22 earlier 142:8 early 26:15 ears 49:13 103:21 ease 108:22 easier 27:7 109:4 easily 119:5,7 East 4:1 Eastern 35:14 39:23 education 58:8,9 effectively 50:17 Eighty 14:4 elected 42:21 election 41:15,20,21, 23,25 42:8,17, 18,21,24 44:7, 12 46:4,15 48:1 102:7,8, 21 elections 41:13 116:18 elevators 104:10 Eleven 15:15 elicit 122:16 eloquent 17:8 else's 130:25	emailed 32:20 emails 6:22, 24 7:6 47:25 48:12 50:7 51:12,20,22 68:20 92:20 102:25 127:3 128:15 164:17 165:18 embarrassed 42:19 embarrassm ent 136:19 Emily 135:14 emotional 83:21 Employees 32:15 enable 153:20 encouraging 7:7 encumbered 62:25 63:1,2 67:8,12,15 68:5 69:22	entirety 70:21 entitled

108:16	31:6	8,9,12 56:23	extra 53:5	83:11 84:1
environment	evidence	62:3 67:2	80:20	85:25 87:17
102:4 103:17	66:8,10,11,12	70:14 72:20	extract	91:15 97:2
EOC 59:22,25	141:5,6	74:9 76:4	156:14	98:17,22 99:9
Equity 109:25	159:13,14	78:15 79:16,	extraneous	100:19 101:6
erroneously	165:1	20 81:13	62:11	102:11,12
16:5	ex-chair	83:11 84:1	extreme	103:6,23
essential	115:21	85:25 91:15	17:23	104:1,8
122:8	exact 5:6 72:2	97:2 99:9	extremely	105:19,25
establish	115:19 128:24	111:9 114:22	40:22	106:6 107:2,
93:22 141:9	161:16	131:5 141:15	eyes 101:18	17 109:19,20
158:3 167:14,	exam 104:25	146:1	104:24	111:9 114:22
20	examination	exhibits 62:4	Eylem 4:10	118:5 131:5
established	25:1 33:19	91:1	13:23 49:8	134:14 141:15
73:14 107:25	125:19	exist 37:9	78:2,7 121:10	142:23 146:1,
139:15	examples	expect 12:19	137:10,11,13,	6
esteem 124:7	48:21,23	113:24 115:13	14 139:13	fair 38:9 112:3
ethical 42:6	49:19 53:11	experience	140:15,19	148:5 149:15
103:20 117:16	95:24	134:6 156:19	142:7,8	faith 136:7
ethically 42:6	excellent	165:17		fake 6:19
ethics 50:3	118:23 146:12	expert 100:21		fall 4:25 5:21
117:16	exchange	explain 64:9	F	6:21 26:9 45:3
ethnicity	57:1 76:11	88:21 91:11	F-23 79:24	46:12 73:5
45:24	excited 37:11	97:23 107:14	F.13 157:6	97:16,18 98:1
Europe	47:8 82:6	114:9 138:8	F.13. 157:13	99:1
123:20	152:23 153:4,	160:20	F11 15:5,8,16	false 143:8
European	5	explained	face 104:10	falsely 16:1,3
35:11	exciting	44:23 58:6	114:9 117:11	familiarize
evaluate	153:20	159:3	158:15 167:10	39:13
118:6 122:3	excluded	explaining	168:15	families 38:4
evaluation	114:2	83:18	fact 29:25	family 53:7
118:23,25	excluding	explanation	32:5 38:23	81:23 105:22
119:2,9,18	82:18	134:19	39:7 70:24	106:3 111:25
142:24 146:6,	excuse 8:17	express	76:25 114:2	famous 35:6
16,19	18:23 20:4	49:12 50:24	129:7 135:3	145:10 146:9
evaluations	36:13 57:19	extended	factor 136:19	fan 88:14
118:20,21	90:21	55:11	facts 159:13	fancy 143:6
146:20	excused 33:3	extension	factual	fantastic
event 36:22	excuses	62:20	137:16	40:17
58:15 123:6	30:21	extensions	faculty 19:4,	fantasy 64:2,
142:11	exercise	131:12	9,21 38:23,24	6
events 112:7	120:23	extent 12:20	39:8 47:17	FAQS 50:13
128:6 131:11	exhausted	external	56:23 57:9	fashion 95:5
156:19	43:4	98:16 99:12,	67:2 70:14	fatality 82:4
everyone's	exhibit 15:3,	16,22,23	72:20 74:9	faulty 148:22
	4,6 29:2,3,5,7,	100:1,6,17	76:4 78:15	
		101:4,9,22	79:20 81:13	

favor 92:16	figure 71:24 152:23	13 171:14	FM-2 15:4,9, 10,16	85:4 87:14 97:13,20 132:9
favorite 44:22 101:6	file 21:24 22:11,18 23:17,18	finishing 152:11,24 165:17	FM-20 125:14 131:3	forming 121:4
favoritism 49:4	filed 147:10, 11	Fintushel 58:11	FM-21 141:11	forms 48:8
fear 133:10	files 47:8 51:7	fire 37:8 100:2 121:24	FM-22 145:23	formula 165:24
February 80:8 131:1	final 41:17 59:20 61:7 139:10	fired 44:15 58:7 59:21 104:15 105:19 148:8,9 149:5	FM-3 56:20	Forty 103:25
federal 65:17	finally 41:8 88:20 106:21 139:13 147:23	fires 152:21	FM-4 66:25	found 31:15, 25 37:7 88:1 91:25 92:3 103:4 108:9 112:22 122:24 123:17 126:18 130:2 137:10 167:11 170:24
fee 65:24 74:25 75:16	financial 51:20 54:4 56:15,18 63:10	Firm 146:10	FM-5 70:11	Foundation 35:8,9
feel 27:2,6 42:2 43:6 46:13 48:20 49:22,23 65:12 95:7 101:6 113:18 121:11 128:11,12 142:2 156:4	find 28:11 43:1 44:6 58:3 86:16 105:14, 15 138:19 153:20 166:19,21,22 169:8	first- 152:8	FM-6 73:13	founded 35:7
feeling 42:3 88:19 144:3	finding 18:16 21:25 22:8 23:14 30:17 139:14 141:17 147:3,5,19 148:16,17,19, 20,21 149:19, 22	fixed 68:24	FM-7 73:13	fourth 14:7 21:15,17
feelings 51:23 107:1	findings 19:10 20:1 21:21 23:1 24:9 65:25 66:1,16 141:3	flat 71:2	FM-8 76:1 157:5,6,14	France 133:17
feels 52:16	fine 100:8 140:20 151:20 160:24	flexible 18:13 27:18	FM-9 78:11	Frank 61:3
fellowship 69:21 70:25 71:1,18 77:18 79:3,5 152:3	finish 7:11 28:4 76:15,16, 25 77:1,2 113:20 135:10 155:6	flipping 109:4	focus 19:16 131:16	Freasor 148:7
felt 44:22 52:18 88:7 92:4 98:13 110:2	finished 7:19 135:17 153:11 160:23 166:7,	fluctuating 17:12	focused 34:17,20 170:3,4	free 49:14,15 64:14 101:19
FGO 57:9		flying 73:25	FOIA 12:22	free-floating 141:18
field 38:1 40:9,10 52:17 122:8 133:23 135:23 145:19 146:9,13		FM 72:17 157:8	FOIAS 12:16	frequently 124:16
fields 100:20, 21		FM-10 79:17	folder 43:10 60:23	fresh 142:16
fight 127:4 132:16 135:18		FM-11 81:10	follow 100:3	FRG 34:16 37:1,12 131:17
fighting 17:4 71:3 165:7		FM-12 83:4	fooled 60:12	Friday 84:14, 18 85:1 171:13
fight 50:15		FM-13 83:23	Force 16:2,4	friend 102:5 106:6 124:12 168:16
		FM-14 85:23	forced 41:23	friends 103:3 106:25 112:20 113:2 122:10
		FM-15 91:13 96:23	forcibly 15:22 16:6,7,8	
		FM-16 96:25	forcing 44:10	
		FM-17 99:7	foreign 45:20 50:16 89:25 105:4	
		FM-18 111:6 114:18	forever 139:12	
		FM-19 125:13	forgive 156:22	
			form 12:1 22:9 49:16 117:8 142:24	
			formal 22:7 24:5 36:16	

frightened 110:15 front 25:9 57:15 60:19 106:5 115:24 155:9,16 163:5 frustrated 132:2 fulfilled 171:9 full 40:17 52:5 fully 67:8,15 76:9 94:12 fun 102:19 fund 59:5 64:25 144:16 funding 35:10 63:15 151:7 funds 60:4 78:9,10 future 132:10 G G2 6:1 Gagnier 137:1,2 138:7, 23 139:6 140:20 Galvin 147:18,19 game 158:7, 10 167:9 169:9 games 53:1 Gang 161:10 gave 29:2 30:16 36:25 39:8 77:3 88:15,19 89:7 111:16 132:6 134:6 general 56:12 64:25 115:23 147:24	generous 94:10 genuinely 162:10 geometric 39:5 122:1 geometrist 124:15 geometry 34:12,15 35:6 36:7 37:20 100:20 119:6 122:5 George 9:16 121:16 146:7 Germany 36:24 122:25 126:20 get-go 158:7 Gilbera 35:13 Gilmore 35:5 38:3,7 Ginther 73:4 girls 115:17 give 8:6 9:4,7 12:23 15:19 26:22,24 33:14 35:22 36:8,16 37:4 47:12,22 51:18 53:4,24 60:7 64:14,18 67:20 72:7 77:19,25 80:19 87:24 88:11 89:7 98:17 103:21 106:14 108:18 113:6 116:12 121:7 132:15, 17,20 134:8 136:17,21 137:25 138:8, 13,17 139:25 141:18 155:8, 16 162:1 165:10,11,25 giving 36:14, 19 37:2 45:21	53:10 86:19, 24 99:19 135:14 136:14 152:2 163:11, 12 goal 37:14 38:3 goings-on 49:24 Gokova 6:12 131:24 gold 152:24 good 24:20 38:18 39:23 43:6,18,19,23 45:11,12,22 49:11,22 50:5 53:23 65:21 77:19 88:20 104:1 111:16, 18 119:12 121:16 126:21 134:4,7 136:7 145:16,17 146:4 150:17 151:5 152:19 153:12,13 162:19 165:17 goodness 50:3 Google 52:3 118:11,12,15 121:4 gossip 129:8, 9,10 govern 39:13 government 53:6 144:20 governor 100:2 grad 16:17,18, 22 19:9 45:16 50:16,22 69:24 71:11 75:13 105:4 109:19,20 135:13 151:2 152:9 158:9	graduate 5:2, 4 7:4,25 8:9, 11,12 14:2,6, 12,14,15,19 16:12,22 17:10 18:7 19:21 26:4,5 27:8,10 28:6, 20 30:17 31:6, 16,17,21 32:15 44:17, 19 46:1 51:18 69:11 70:4 75:23 77:3 80:14 93:25 105:20 108:10 118:4,25 123:17,21 124:15 140:16 150:19,20,23 151:6,7,24 152:25 154:1 graduate's 16:23 graduated 32:1 52:17 121:2 150:7 graduates 38:19 grander 89:6 grant 6:8,11 34:21,22 35:6 53:22 54:6 62:25 63:1,2 67:17 68:25 73:21 75:13, 19 76:8,16 77:7,23 80:23, 24 93:7 94:11, 12 119:18,19 131:17,23 132:24 134:21 135:3,6,11 136:5,6,23 143:7 144:16 145:3,11 146:22 152:5 158:9,16 160:6,8,10 grants 34:20 51:13,14 52:5, 6,11 53:24	65:17 67:8,11, 14 68:5,8 71:21,23 76:12,13,21 78:3 86:15,18 93:7,18 121:3 127:9,13,14 131:8,9,13,15, 16 132:3,7,17, 18 134:23 135:8 136:12, 13 143:9 144:10,14,23 145:3,4,7,8,9, 14 146:6,17, 19 154:12 162:4,5 graph 43:16 44:1 graphs 43:17 great 38:18 40:10 73:5 144:3,4 greatest 4:15, 19,20,21 grievance 57:9 86:22,25 87:1,3,17,18, 20,21 88:9 108:7,20 113:8 134:10 166:24 167:1, 4,6 168:13 grievances 168:20 gross 125:22 ground 100:11,12 grounds 20:10,11 group 34:23 36:8 37:1,12 39:6 131:17 139:1,8 GS 75:21 guess 98:9 149:6 guide 129:22
---	---	---	--	--

gum 60:10	happy 130:1 149:20 158:19 165:5,16 171:12	137:5	highly 47:15 94:18	house 133:20
guy 104:13 105:7,10,12, 25 106:8,9,14, 17,19 111:17, 18 124:20 145:19	harassed 124:18	hearing 9:14 57:11 83:7,23 87:21 88:6,20, 24 157:1	hire 46:24	housing 64:11,13 77:4
guys 24:22	harassing 112:2 113:17	hearsay 67:18 133:1	hired 38:24 39:9 89:11	HR 137:10,12
gymnasts 115:17	hard 16:16 131:22	heart 45:10 71:22 94:8 116:19 158:13,14	hires 37:8 152:21	huge 50:9
H	harder 27:8 28:3	heartbroken 59:25 89:18	hiring 39:16 46:16 47:10 50:21,22	Hughes 103:6
H.33 163:25	harsh 149:12	heavily 119:20	history 49:17 102:23	human 32:11, 25 46:17,18
half 63:19 144:19	Harvard 17:16 39:25 85:20 121:6,7	heavy 103:11 105:6	Hofferman 148:6	humiliating 32:4 105:3
Hall 115:21 116:8	harvest 150:25	Hedden 9:16 88:13,14 134:2 151:8	hold 12:9 31:17,20 32:2 84:14,25 85:3 87:19,20 126:2 137:21 152:16	humiliation 162:16
hand 15:3,4 33:13 68:12 70:16 72:22 74:10 77:9 79:23 84:3 86:2 97:4 107:6 109:6 111:11 114:8 142:14 157:5 163:2,20	hashtag 139:7	held 108:9 147:21	holding 45:21 84:12 88:24	hundred 14:4 74:25 75:16 128:23 137:20
handled 39:9 46:23 62:21	hates 48:2	hell 52:2 136:10	Holland 122:25 123:20 126:19 129:1	hundreds 52:6 68:8 69:4 76:13
hands 45:21	he'll 108:11	helped 101:4 134:15 153:9	home 127:24	hunting 110:19
happen 28:22 87:2 106:2 112:9,12 113:14 121:21 162:14	head 25:9 29:17 42:18 44:17,21 124:15	helpful 102:14 107:5 118:16	honest 106:25 134:11	hurry 52:21 136:6
happened 6:10 13:13 20:21 34:6 41:2 46:10 100:9 101:11 112:23 122:3 123:19 124:10 126:20 129:5 137:9 153:18 154:15	headers 132:9	helping 136:17 145:2	honor 35:25 36:2 53:22 74:24 137:17 139:4	hurtful 105:13,16 127:22
happening 168:12	heading 140:5	Hennessey 34:14	hope 110:2 113:19	hurts 51:23
	health 56:2,5, 7,14 57:2,4,13 58:3 63:10,15 64:24	Henshman 57:23	hopeful 102:9	hush 57:20
	healthy 50:25 106:23	Higgin 60:2	horrible 27:12 104:14 134:6	I
	hear 51:11 64:9 75:14 112:19 115:8, 9 143:17,19 154:25	high 24:13 42:14 79:10 99:21 110:20 124:7 145:4 153:4	hostile 102:4	idea 43:18,23 67:16 68:9 114:6 125:22, 23,24 166:6 168:14
	heard 9:15 44:2,12 71:9 110:14 115:2, 7 121:24 123:6,20 127:11 129:1	higher 166:11	hour 17:1 162:7 164:16	ideal 47:23
		higher-ups 101:21	hours 36:20 71:6,7,14 85:4 101:2 117:2,5 162:21	IDENTIFICAT ION 56:22 67:1 70:13 72:19 74:8 76:3 78:14 79:19 81:12 83:10,25 85:24 91:14 97:1 99:8 111:8 114:21
		highlight 94:8		

131:4 141:14 145:25 identified 125:19 140:18 identify 55:8 60:8 61:14 66:17 122:21 141:24 142:22 163:17 ignorant 89:5 image 139:2,9 imagine 52:2 78:1 82:5 134:14 immediately 41:9 54:15 69:7 impact 38:15 126:11 implicit 166:14 167:22 importance 144:9,12 important 46:21 56:15 155:21 impose 26:13 81:6 imposed 6:18 21:3,20 26:18 impossible 26:14 85:12 impression 125:1 improper 10:25 improve 139:1 improved 98:18 impugn 129:2 137:20 impugning 125:10 127:19 inappropriate	47:16 inappropriate ly 154:22 incident 127:7 incidents 127:5 include 82:16 included 98:6,22 includes 143:24 including 43:1 132:1 168:9 income 80:18 143:21 incompetent 113:22 incorrect 98:1 increase 64:2 incredible 101:14 independent 43:14 99:25 103:18 111:18 112:4 114:16 independentl y 112:5 index 118:11, 19 indicating 9:17 22:10 indication 106:4 individual 99:1 Industrial 63:14 info 98:6,7 inform 20:5 22:5 54:6	informally 123:11 information 26:12 28:12 37:17 62:11 67:14,20 76:8 122:17 124:20 129:24 130:11,21 138:4 151:6 informed 123:11 inside 23:17 104:16 instance 17:1 19:25 26:18 35:21 37:2 126:18 135:2 144:23 institute 36:24 37:19, 20 120:16 123:4 131:20, 21 institutes 34:21 institution 38:12 81:8 109:25 institutional 113:11 instruct 9:9 53:19 148:14 instruction 90:12 instructions 88:11 90:12 136:17 instructor 128:21 instrumental 50:17 insult 114:2 137:21 insulting 106:18,20 127:19 136:15 138:3 162:22	166:1 insurance 54:17,18,19, 20 55:1,3,11 56:3,6,7,14 57:2,4,13 58:3 59:1,6 60:5 63:5,10,16 64:5,24 71:25 intend 51:6 139:6,7 intended 65:9 intent 50:7 intentionally 123:15 125:10 intercept 51:22 127:14 interest 150:2 155:2 interested 40:6,9 115:10 interesting 153:19 interim 59:20 interject 20:15 Interlogic 36:6 internal 10:12 international 35:6 internationall y 34:19 internet 50:12 interrogatory 19:14 interval 26:22,24 interview 102:14 142:6, 9 interviews 116:19	interworking s 10:23 39:4 intimidated 32:13,22 introspective 115:9 invade 74:24 investigate 63:23 112:25 148:25 investigated 65:12 investigating 10:4 investigation 10:8,16,22 11:20 13:14 20:1 22:18 30:6 45:1,2 58:6 59:19 63:23 65:5 66:16 137:13 139:11 140:22 141:4,8 142:1 148:10 investigation s 10:20 11:10 investigative 139:10 investigator 141:5 investigators 65:13 invite 40:11 123:10 124:21,24 invited 37:25 38:3 100:22 121:7 133:4 inviting 123:15 involve 85:21 involved 9:2 50:20,23 104:4,6,7 119:20 133:8 152:6
--	--	--	--	---

involvement 30:11	jobs 98:20		kinds 45:23	143:4
involves 131:17	joined 125:9	K	Kirill 110:8	larger 61:20, 21,23 65:24 66:9,15
involving 12:25 50:18 118:4 128:7	joke 69:23 116:17 119:13 120:9 167:24	Kalka 123:14	Kirkpatrick 41:16 46:13 47:11,25 48:2, 12,14 59:18 72:6 86:10 88:14 92:2 112:1,7,24 113:11,24 114:9 147:5,7, 12 162:19 168:16	laugh 104:5
Iran 135:13	jokes 117:4	Katmoso 26:12	keeper 167:1	laughing 72:5 158:19 162:21
Iranian 52:13 53:18	joking 72:4 103:1 116:7	keeping 49:2 112:21 166:1		launched 121:24
issue 13:2,5 30:19 57:12 59:2 69:10 80:11 156:9 161:20 162:2 165:20	Jon 8:3 11:13, 22 21:3,7,21, 23 22:3,17,25 23:6,7,9,13,23 24:6 30:7,14, 23,24 31:15 45:15 92:17 93:8,9 102:15, 20 115:21 116:8	Keith 4:12 26:4 30:19 31:13 32:11 45:15 57:6 58:11 71:7,23 72:1 84:7 91:22 92:16, 22,25 93:5 96:14 102:13, 20 105:24 111:25 112:1 116:15 122:11,25 129:22 143:16 147:2 156:2 158:14 161:17,25 162:15	Kitch 146:10	law 89:23 146:10
issued 139:10	Jon's 75:14	Keith's 94:23	knew 8:3,4 43:24 45:17 54:25 64:15 72:4	lawyer 88:17 89:20
issues 57:19 109:22 140:6, 8	journal 110:22	Kelley 11:6 12:14 13:8 21:10 156:7 169:25	knowledge 30:20 64:22 99:3 150:25	lawyers 87:25 88:2,4 137:12 142:7 167:7
Italy 38:20	journals 117:25	kicked 113:9	Koivisto 80:4, 25 132:12,20 136:25	lead 131:20
item 116:24, 25 117:1	judge 16:1,3, 5,7,9 33:2 47:6 55:16 60:13,20,24 93:22 121:12, 14 122:9 125:7 156:22, 25 163:25 168:1 169:14 170:14,17,21	kicking 113:16 136:8	Kulkarni 9:15,16	leader 44:19 122:4
Ivanka 69:20	judgments 125:2	kids 84:24	Kurry 135:14	leading 34:21 85:9
Ivano 151:4	Julia 111:12	kill 39:25	L	Leahy 147:23 149:5
J	July 136:3,4	killed 148:24	lab 71:14	lean 162:12
jail 54:6 100:9	June 30:2 109:17	kind 26:24 27:15 35:25 48:14,17 67:20 71:9 88:19 104:16 105:23 120:15 123:24 126:22,24 136:23 145:18 148:4 151:5 152:8 163:18	label 126:9	learn 38:21 107:1 152:20
January 30:3	junior 121:19 134:14 160:21		labeled 68:13 70:17 86:3 97:5 120:18 140:5	learned 4:22 50:19
Japan 135:12	justification 63:1		labor 47:13,23	learning 81:8 94:12 126:11
Japanese 76:18	justify 62:22, 23		lack 156:19	leave 39:24 153:15 155:19
Jim 41:16 112:1,7,24 113:10 114:8 121:16 168:16,19			landing 149:11	leaving 162:11
job 39:7 43:11 46:18 47:1,21 49:22 93:13 134:15 160:13,15,20, 24,25 161:15, 21			language 164:21	lecture 123:13 124:21 130:9
			Lansing 4:1 110:21	lectures 36:8, 14,20
			large 21:25 22:19,23	led 164:5,8
				left 44:4 58:23 72:4 82:9 115:12 158:20 162:17 165:16 167:13

legal 48:8 Legally 51:15 length 10:15 147:3 letter 21:23 22:3,7,8,9,11, 12,16,17 23:1, 15 24:4,7,16, 18 67:23 86:18 87:14 97:13 110:18, 24 111:22 112:15,22 113:13 letterhead 132:9,20 letters 51:7 110:3 112:16 122:5 130:25 letting 69:1,3 154:10 157:20,21,25 160:4 level 40:1 98:18 99:21 153:4 166:11 levels 14:17 lever 99:21 liberally 26:8 lie 43:13,25 64:23 65:13, 14 94:15 127:7 145:15 lied 128:20 lies 63:6 65:9 life 53:20 127:15 128:22 133:11 135:19 162:20 167:8 likes 106:10 lines 75:10 lining 16:13 list 50:13 88:6 95:15 129:17 listed 131:11	listen 57:22 71:23 101:3 103:9 161:13 169:7 listening 49:16 57:25 127:9 listing 88:5 literacy 123:10 literally 30:14 32:12,14 157:1 live 115:16 lived 105:11, 15 living 127:15 LM 72:17 LM-6 72:15 load 14:23 25:4 97:24,25 98:3,4,8,11,22 121:8 loads 99:13 105:6 locate 141:25 lodging 22:8 log 115:10 118:8 long 28:9 29:18 33:25 34:3 54:12,24 73:22 98:11, 12 164:13,20 looked 133:10 lost 41:24 42:1,15 106:9 116:18 150:2 lot 4:22 26:25 27:1 35:8 38:9,18 50:15 53:18 110:13 129:8 137:17 lots 66:8	love 119:20 loves 35:14 low 24:12,13 Lower 168:1 Lucas 102:11 lucky 152:4 153:9 Luke 67:13 68:3,6,20,21 69:14 70:8,23 71:3 72:1 73:22,24 75:13,14 77:17,22,23 78:3,6 79:1,9 80:17,22 82:16,18 92:15,18,25 94:9,12 120:24 150:5, 11 151:9,13, 16,17,21 152:13,16 153:25 154:14 157:21 158:23 159:22,25 160:9,17 162:7 Luke's 73:4 82:20 94:10 lying 64:16 65:19 103:12 128:21 M made 18:18 19:15 27:7 32:24 41:8 43:13 44:23 48:21,23 50:12,21 59:17 60:14 83:19 92:13 93:4 98:15 102:19 104:25 105:10 106:6, 14,15 113:2 114:10 116:8, 11,17 121:15 125:2 126:12	127:1 134:4 135:22 140:16 major 37:6,25 make 8:17 10:17 13:24 15:13 18:9 24:1 26:8 27:14,17 28:4, 5 30:21 35:24 40:24 41:5 47:5 50:13 51:2 52:10 53:25 54:5 56:18 61:24 65:24 68:9 78:3 84:20 92:8,12 93:3 99:25 100:14 101:6,15,16 104:22 106:24 112:20,25 115:23,24,25 116:4,9,10,13 128:22 134:4, 13 142:2 156:3 160:13 161:25 165:11,24 maker 51:3 makes 91:5 153:19 making 20:4 25:25 35:10 49:3 89:17 113:16 134:18 165:4,13 managing 131:24 manipulate 18:2 March 130:15, 16 mark 45:9 62:6 145:22 marked 56:22 61:2 62:13 66:24 67:1 70:13 72:19 74:8,11 76:3 77:10 78:14	79:19 81:12 83:10,25 85:24 91:14 93:20 97:1 99:8 111:8 114:21 129:21 131:4 141:14 145:25 marking 61:25 Massachuset ts 52:17 master 37:8 master's 26:5 match 53:23 material 88:17 120:21 materials 122:8 math 4:22 7:5 14:3,5,12 18:8 21:2 38:17 39:4,11,14 48:20 49:1,2, 20 56:7 57:3 85:6 90:6,7 96:16 99:14, 15 101:9 103:24 106:7 109:19,25 113:25 114:5 125:5 128:7 129:6 132:22 144:9,13 170:7 171:3,5 mathematicia n 28:1 40:8,19 53:18 121:13 123:18 126:22,23 133:22 145:13,17 146:9 mathematicia ns 71:16 117:20,22,23 123:10 126:24 145:11 153:18 mathematics 37:5,7 38:22
--	---	---	--	---

63:15 84:16 140:18 151:1 153:19 154:21 168:5	meetings 34:17 41:11 71:4 162:25 164:2,18	Michigan 4:1 5:24 28:12 34:1,3,22 38:13 63:14	56:18 mistreated 40:22 41:1	Morris 123:14
Matt 9:16 134:2	MEMBER 56:23 67:2 70:14 72:20 74:9 76:4 78:15 79:20 81:13 83:11 84:1 85:25 91:15 97:2 99:9 111:9 114:22 131:5 141:15 146:1	middle 36:14, 19 39:22	misundersto od 80:13 95:25	motion 115:23,24,25 116:4,9,10,12, 13,16 154:17, 20 155:13,14, 16,17,21 156:21
matter 166:13		midnight 82:2,3	MIT 40:11,13	move 56:20 65:22 70:10 74:6 75:25 78:11 79:16 81:9 83:22 85:22 91:9 96:23 99:5 111:5 114:17 125:13 131:8 141:11 145:22 156:21
matters 71:19		mike 33:23 103:9 157:3	model 29:1	movie 101:15 106:10,11,17, 18 153:3
Max 36:24		mince 128:25	modest 107:5	movies 106:11
maximize 64:1		mind 9:7 40:3 104:13,16 129:22 140:23 165:24	modesty 107:4	moving 72:14
Mccarthy 151:4	members 103:24 104:1	minds 145:18	modify 7:22	MSU 5:1 10:3 14:3 18:8 23:8 32:18 34:5,7,9 35:15,16 36:12,17 38:17,23 39:2, 6,19 40:22 99:18 102:12, 21,23 109:25 124:11,13 126:12 132:9 138:25 139:16
Mckay 135:2	memory 9:21 138:9 155:25 156:8	mine 26:11 52:5 118:9 152:24	Mohammad 56:2	Muslim 59:24
meaning 31:24 105:11 166:14	mention 106:8 166:3, 15,16	mini 36:6	Monday 85:3 171:13	N
means 12:6 34:16 50:2 59:24 88:2 94:13 98:20 108:4 118:2 125:17 144:19 169:13	mentions 75:21	Minnesota 35:2 131:19	Mondays 85:3	Nancy 33:23
meant 72:17	menus 9:24	minorities 46:22	money 52:11 53:7 57:13 64:14 65:16 68:3,5 69:6,10 75:2,3,13,19 76:25 77:1,24 79:14 80:20, 22,23 88:17 131:14 132:5, 23,24 134:21, 23 135:7,9,16, 19 136:14,15 144:20,23 145:3 146:22 154:12 158:9, 25 160:4,7	narrationist 124:11
meantime 89:20 134:18	message 147:23	minority 46:24,25 47:3	monster 134:18	narrative 123:25
measure 19:10 119:13	messages 137:19	minute 30:7 95:3	Montereso 38:1	National 35:7, 9
measures 19:4,20,22	met 4:16,19 30:19 37:20 40:8 48:2 86:13,21 87:18 107:25 114:4	miracle 105:20	Monteroso 146:7	nationwide
mediate 92:5	method 90:8	mischaracter izes 159:12		
Mediterranea n 35:14	methods 6:1 118:10 145:21	mischaracter izing 159:18		
meet 40:4,5 87:11 92:2 101:20 113:9 114:8 161:19 168:18	metrics 117:24 118:7, 19 119:13,15 120:1,9 122:6 161:24 169:6	miserable 128:22	month 45:6 123:2	
meeting 57:14,16,21 59:2 114:8 115:23 116:6 154:16 162:20 163:1 165:12 166:12	Mexico 6:12, 13	misery 165:11	monthly 133:3	
	Miami 34:24 35:3	missing 5:16	months 41:10,20 82:6 171:9	
		mission 40:20		
		mistake 104:25 116:9		
		mistakes		

40:20 Natural 92:5 93:11 94:1 140:14 142:23 143:13 neat 80:1 necessarily 11:5 13:14 needed 48:8 63:9 110:3 135:15 136:8 152:18,19 needing 95:2 negative 42:13 45:9 negotiable 66:11 negotiated 100:23 negotiating 164:21 nepotism 30:18 121:15 nepotistic 103:2 nervous 132:8,14 neutrality 35:23 newspaper 110:15,18,22 Niashaopa 8:15 nice 35:13 101:3 105:19 night 83:20 84:25 85:13 nightmare 75:5 112:11 115:19 nod 25:9 nodding 29:17 nominated 42:25	nomination 102:24 noncredit 70:7 normal 40:23 42:17 45:23 notarize 89:24 notary 89:24 90:21 notes 121:8 169:1,3 notice 51:24 52:12 noticed 39:21 November 29:15,16,21 NSF 34:20 51:13 54:7 67:7 75:12 94:11 number 18:10 41:9 48:12 50:9 72:23 74:12 77:10 78:18 79:23 83:14 96:8 109:1 117:24 118:1 120:2,8 122:1 163:4 numbers 68:24 118:17 119:3,4 132:6 O obituary 105:9,10,13 object 7:14 10:11 12:1 14:10 19:12 20:9,10 148:18 159:7, 9,12 163:9 objecting 73:17 objection 21:8 22:6	56:21 65:23 66:23 70:12 72:16 74:7 76:2 78:12,13 79:18 81:11 83:7,9,23,24 90:14 96:24 99:6 111:7 114:19 125:15 126:7 130:18 141:12 145:24 objections 66:19 obligations 89:10 observer 99:25 obstructing 145:3 obtain 144:10,13 obtained 31:8,9 obvious 80:11 OC 58:8,11 occasion 124:7 OCR 58:12,13 October 6:19, 25 8:1,13 26:18 27:22 28:7,9 60:15 68:21,25 72:2 74:17 75:4 77:2 78:24 81:25 82:2,3 95:9,23 96:2, 5,20 131:10 150:14 159:1 160:2 164:23, 24 odious 124:24 OEI 58:6 offend 43:9 offending 51:4	offer 92:19 94:10 offered 134:8 offering 66:9, 13,15 office 10:3,5, 23 28:4,20 40:2 43:6,12, 18 44:16,17, 23 46:5 48:15 54:5,13,16,21 57:8,9 65:10 68:2 69:2 71:6 72:5 75:14,21, 23 86:12,15, 21,22,25 87:2, 17,18 88:5,9, 10 91:24 92:1, 10 93:16 97:21 103:14, 15,19 108:1 109:25 110:3 115:13,18 132:4,14 133:5,9 134:2, 3 136:23 144:24,25 145:1 147:24 148:11 149:18 150:19 154:1, 2,4,6 158:16, 20 160:6,15, 16 161:2,22 164:3 165:9 offices 32:16, 17 44:16 89:24 103:18 official 22:11, 12 officially 15:21 OGC 147:24 148:22,23 149:13,16 OIE 10:5,13, 16,23 11:2,11, 13 12:11 18:15 19:25 21:21,25 22:18,25 23:14,20 24:7,	9 30:6,11 31:15 32:22 45:7 58:15 59:2,3,4,8,10, 11,15 60:14 65:5,19 66:5, 14,22 104:21 106:2 137:13 140:3 142:10 147:3,6,11 148:2 Olga 46:2 olive 163:8 Ombudsman 72:10,11 91:24 92:1,4,8 114:15 omnivision 85:14 one-person 41:19 one-to-one 120:22 online 137:19 onset 37:14 open 30:1,18 48:5,9 57:14 95:9 96:1,5,11 110:3,24 112:15 opening 82:19 openly 64:4 opinion 43:21 80:25 120:12 137:16 opinionated 120:13 opinions 50:24 128:1,2 opportunity 39:8 98:17 opposite 114:13 opposition 102:18
--	--	--	--	---

option 87:7,8	131:21	pain 64:1 89:17 105:7,8	Party's 108:24	penalty 21:25 22:1,19,20,21, 22,24 23:1,5, 10,19 34:5 36:18 48:16 64:5 86:20 88:15 101:11 103:11 111:3 112:21 115:2 126:13 127:20 165:22 166:1, 3,6,11,14,17 167:22 168:4, 7
options 87:6	overlooks 168:9	painful 128:9	passed 105:16	people 7:7 10:18 13:3 17:17,22 25:19,21,22 28:21 36:1 38:11 39:25 40:5 41:12,19 42:4 44:15 48:1 49:6,25 50:6,13,18,20, 23 51:15 52:18,25 53:13 57:22 65:12,17 81:4 92:24 94:18 98:19,20 99:18 100:7,8, 9,14,15 102:1, 17,18 104:7, 16 106:5,24, 25 107:17 112:2 113:10 115:9 116:5,6, 7,21,22 117:10 118:24,25 119:7,14 120:10,24 121:14 123:6 124:13,17 125:9 126:12, 17 128:5,18 129:4 133:5, 23 134:11 135:23 136:12,14 138:2 139:1,8 141:24 145:8, 12,16 158:2 161:8 162:22 165:18,19
orally 90:25	override 68:23,25 82:1 83:19 159:1,2, 3 160:1	Palestinian 45:25 46:1	past 41:3 44:24 48:6 82:2	
ordeal 149:8	overridden 82:24	panel 20:15, 18 53:16 91:5 148:13	Pastel 48:7	
order 50:12 51:21 151:24 152:12,14,17	overrides 82:5	Papara 161:14	patient 105:8	
ordered 127:6	oversight 115:3,4	Papara's 47:12,16,18 161:14,18,20	pay 37:16 51:9 52:22,23 53:2 54:13,17 55:1,3 64:1 67:12 68:6 69:8,13,18,20, 22 70:8 73:4 74:2,4,24 75:8,15 77:5 78:1,10 79:11, 14 80:16,17, 22,23 88:17 94:10 136:2 144:20 154:11 158:25 159:23 160:6,10	
organization 6:14	Oxford 121:9	paper 118:13 152:24 153:10,11 169:1 171:2	paying 63:4 68:10 75:7 94:14	
organization s 35:9	P	papers 37:16 117:24,25 118:1,14 120:8 122:6 152:25	payment 54:5 57:4	
organize 34:12 40:4 118:3 131:24 134:6	P.C. 150:5	Pappas 9:17	payments 59:6	
organized 34:9,16 37:12	P.I. 51:14 54:10 131:20	paragraph 94:20,21,22, 23 140:4	PDF 131:11	
original 170:23	p.m. 4:3 5:17 33:12 55:17 56:24 58:22 67:3,4 70:15 72:21 76:5 78:16 79:21 81:14 83:12 84:2 85:3,7 86:1 91:16 97:3 99:10 111:10 114:23 121:22 129:14 131:6 141:16 146:2 171:20	part 13:7 19:6, 7 20:2,3 35:13,16 61:20,21,23 62:21 66:8 84:7 145:2 146:15	peace 165:4	
Osowski 140:11	p.m.-12:56 33:12	participants 34:24	peer 144:25	
ostracize 100:18	package 98:25	participate 37:21 153:5	Peller 110:8 121:22 147:10,13	
out-of-state 82:10	pad 169:1	participated 12:8 30:13 34:18	penalize 57:18 168:2	
outcome 147:5	pages 59:19 61:2,6,7,20,21	participation 10:20 30:6 38:16	penalized 36:10 63:2	
outlaw 105:12	paid 51:25 52:1,11 54:19 56:6,14 58:2 59:5 60:3 63:7 64:9,11 88:8 94:18	party 12:17 20:20 25:3,12, 24 66:3,7 82:12,14 138:10,12	penalizing 104:23,24	
outline 164:25 167:15			penalties 106:24 166:7	
outlined 114:25				
outrageous 116:20				
outreach 118:2,6 144:3, 4,5,6				
overhead 101:16 144:17,19 145:1				
overlooking 80:5 93:11,12				

people's 51:23 107:1 115:2 129:2 137:20 peoples 100:2 percent 64:3 98:21 128:23 137:20 143:22,23 144:6,19 percentage 143:21 performance 44:25 performance s 119:10 perjury 90:21 permanent 21:24 22:18 23:17 permission 67:19 permitting 79:6 person 4:15, 19,20 25:8 37:25 40:23 41:14,22,25 42:11,12 45:19,20,23 50:2,8 52:22 71:17 89:5,6 100:13 104:18 105:16 111:18 120:1 121:20 124:24 125:2, 4 127:13 132:12 134:1, 16,19 136:16 147:22 158:15 162:2,20 168:2 person's 119:25 personable 45:19 personal 52:6	personally 158:18 personnel 23:17 119:9 petitions 121:25 Ph.d. 39:24 40:16 75:19 120:1,2,19,21, 25 135:17,20 153:14,15 Ph.d.s 121:1 phone 36:15, 20 54:12 88:23 phonetic 37:8 152:21 phrase 20:23 physically 85:12 156:10 PI 34:22 picked 16:18 picking 44:7 piece 104:4 138:8 Pierson 102:11 pitches 121:25 place 27:2 59:1 81:8 90:3,6 96:16 110:22 158:8 168:14 places 36:13 98:9 placing 94:23 95:1 Planck 36:24 planned 134:4 play 53:1 playing 42:4 44:22 71:5 162:8	pleading 86:12 91:22 plight 133:21 podium 116:15 117:2 point 20:5 127:16 137:24 153:16 158:11,24 162:9 167:18, 19 169:19 pointing 102:6 policy 10:13 18:4,5,7 23:8 79:6 80:14 139:16 141:8 150:23 polite 51:2 politely 50:10 148:13 poor 89:22 portion 144:16 position 30:23,25 31:4, 10,17,20 32:2 38:8 42:20 44:9 45:6 47:1,2,4,12, 17,18,19,21 51:16 95:1 121:17 132:23 positions 31:9 39:16 positive 139:17 possession 156:6 possibly 116:23 post 140:16, 19 posted 118:13 poster 106:11,18	potential 71:15 power 89:12, 13,15,16 107:3,4 powerful 168:17 powers 117:8 150:20 practice 52:15 prefer 109:15 preliminarily 129:21 prepare 37:21 prepared 37:12 preparing 85:13 preponderan ce 141:6 present 13:12 14:25 56:17 88:18 89:22 101:15 123:11 presented 56:3 presents 94:24 president 100:13 109:16 pretend 136:13 pretending 118:24 pretty 159:16 164:12 prevent 75:7, 14 156:5 prevented 52:7 70:23 71:19 166:23 preventing 74:22 127:11	previous 112:16 115:21 134:15 previously 9:14 46:4 70:24 91:3 99:12 principal 160:5 principles 42:6 137:18 169:7 prior 25:25 34:5 37:6 128:15,16 prize 40:20 problem 15:1 16:12,21,25 17:15,16 20:14 40:16 41:4 46:8,24 48:4 53:10 69:8 92:9 103:4 107:2 135:4 142:3 149:4 152:1, 22 154:14 158:16 167:3 168:11 problematic 37:11 problems 17:25 45:23 100:6 102:7 106:7 119:21 139:2 153:1 162:6,23 procedure 61:25 procedures 47:10 proceeding 62:12 116:15 proceedings 35:18 171:20 process 12:20 20:1 41:10 86:13 99:24 106:19
---	--	---	--	--

108:3,5,7,8, 16,18 111:23, 24 113:14 115:15 149:3, 4,7 164:25 165:2 166:18, 24 167:1,4,10, 12,15,21 processed 83:19 processes 11:2 produce 42:14 118:1 133:15 produced 122:7 profess 50:2 professor 4:15,18,22 5:9,20 6:4 7:3 8:20 9:4,6,15, 16 12:25 18:15 25:13 29:2,5 30:5, 11,22,25 31:3, 8,9 32:19 33:5,6,16,25 36:16 40:2,3, 17 45:14 48:18 50:2 52:21 53:12 54:10,16,23 55:18 56:2,5, 13,25 58:2,17 59:9,17,18 60:1,3,7 61:11 63:8,22,25 64:7,23 65:19 66:14 67:6,7 68:16 69:9 70:16,18 71:10 72:24 73:20 74:10, 13 76:6,14 77:11 78:17, 20 79:8,22 80:2,15 81:15, 17 83:14,16 84:5 86:2,5 87:18 90:11 91:4,17 93:20	94:4 97:4,7 103:23 105:3 107:6,9,20,25 108:9,11 109:6,10,17 110:8 111:11, 13 114:24 117:19 119:15 121:11 122:12,18 125:6,15,24 129:1 130:4 131:7 134:20 138:20 140:1, 18 142:19 145:13 146:5, 21 148:14 150:21,22 151:3,4 154:20 159:14 160:7 162:12 163:20 164:7 professors 7:7 40:4 41:15 50:2 110:5 125:5 profit 77:21 program 39:24 progress 62:25 prohibited 10:7 promise 51:17 141:24 promised 46:2 135:7,9 promises 86:15 Promislow 4:7,9,12 5:14, 18 7:18,24 9:9,14 10:2,3, 15 11:1,9 12:13 13:23 14:12 15:8,10, 12,15,17 16:11 19:3,17, 18 20:25 21:1, 11,17,20 22:5, 7,15 24:3,4,20	26:4 29:2,6 30:5,22 31:13 32:11,19 33:10 41:5 42:20,23 43:3, 6,22 44:12 45:15 52:21 53:19 54:4,9, 13 55:14 56:21 57:6,15 58:2 59:4,9,17 60:3,7,12 61:15 62:6 63:13,22,25 64:7,23 65:19, 23 66:23 67:7 70:12 72:16 73:14,18 74:7 76:2 78:13 79:18 81:11 83:8,24 84:11 86:11,19,24 88:14 90:14, 23 92:16 93:5 96:24 99:6 102:13,20 104:22,23,25 109:2 111:7 112:1,24,25 114:19 117:19 121:11 125:6, 15 126:6 130:1,18 141:12 143:16 145:24 146:5, 21 147:2,4,7, 12 148:13,16, 20 150:4 151:17 153:23,25 155:12 156:10,14,18, 20,24 157:2,4, 8,11,14,15 159:8,10,14, 15,22 163:16, 19,23 164:2,8 167:14 168:5 169:12,15,19, 23 170:1,4,6, 16 171:3,5,12, 16 Promislow's 30:11,25 66:14	promptly 167:3 proper 161:18 properly 66:17 protect 18:21 89:21 148:9 protecting 89:16 147:25 protection 55:24 protective 42:2 proud 85:19 120:25 prove 59:22 152:12 provide 93:19 129:23 provided 11:24 63:13 76:7 95:15,24 134:25 provost 86:12 149:16 public 41:11 137:19 publics 89:24 publish 35:17 48:8 110:18, 20 118:1 153:11 published 118:14 121:9 pulled 54:19 punishment 24:9,10,11,15, 17,18 31:25 purists 122:7 purpose 16:13 50:18 purposely 8:4 pursue 43:5	put 41:14 44:16,17,21 45:5 51:16 85:4 88:1,13 92:22 104:16 106:5,11 110:24 117:2 125:25 126:18 127:21 128:1, 19 129:1 136:16 138:25 139:22 165:12 puts 144:1 putting 50:17 105:1 Q qualifications 125:3,7 qualified 125:4 quality 117:25 question 7:11,19,21,23 8:8,18,25 9:11,12 10:10 11:4 12:2,4 13:2 16:20 17:6 18:22,24 19:13,16,18 20:8,13,24 21:1,5,12,13, 16,18 22:2,14, 16 23:13 24:2, 21 62:16 70:2 72:13 86:10 95:25 106:1 126:24 128:15 138:18 148:14,16,19 150:10 151:12,15,17, 20 152:8 153:22,24 155:18 159:21 164:7,22 169:11,13,16 170:1,3,5 questioning 20:22
--	--	--	---	---

questionnaire e 42:10	56:11 58:6 59:3,8 68:16 75:10,11 94:20 107:9 108:23 109:14 118:21 122:5 127:25 140:4, 9,11,23 141:3 154:20 155:17,21 156:5	received 7:6 19:21 21:23 22:3,17 23:13, 15 24:7 87:15 99:13 120:19, 21	recorded 25:8 71:22 161:4,5	register 6:22 7:5 28:12 72:3 75:15 84:21 157:24 158:23,25 159:4,23 160:1,13,17
questions 12:3 14:11 20:15,16 24:23 25:4 33:1 119:11 127:3,23 146:24 158:22 159:25	reader 84:13	receives 12:18 24:5	recording 64:15 134:4	registered 75:17 157:17, 19 158:4
quorum 57:22	reading 8:16 60:9 70:21 73:2 74:20 83:20 84:8,10, 13,15,17,20 85:16,17 120:18 155:2, 10 156:12	receiving 6:21	recordings 128:24 134:3	registration 6:18 74:25 75:16
quotation 124:1	Ready 67:5	recent 117:25 118:16 123:5	records 93:15 94:16 132:6	regular 28:21 85:8 88:4 90:12 98:20
quote 78:3	real 117:20	recently 105:9 118:15 121:9 143:1	recourse 112:4	REIFENBERG 4:5 7:17,22 8:25 9:11,25 10:14 11:3,8 12:9 13:16,18, 21 15:14,24 18:23 19:16 20:7,23 21:18 22:13 24:1,19, 24 33:3,8 55:11 58:21 59:10 61:4,8, 24 62:5,15 66:4,19 67:5 68:14 73:17 78:12 79:24 91:7 109:8 122:14 125:22 129:12,15 130:19 138:14 139:24 141:17,22 146:3 149:24 151:15 153:21 156:15 157:7 159:20 163:14,17,21 164:1 169:10, 21 170:3,22 171:11,14,17
quotes 128:24,25	realistic 101:17	recklessly 106:25	recruit 35:15 38:18 45:13	related 82:22 109:22
quoting 131:1	realize 43:12 44:14 53:19 112:21	reclaim 139:4	recruited 39:8	relationship 104:2 148:23
R	reask 129:20	recognize 55:18 61:11 70:18 72:24 74:13 77:11 78:20 80:2 81:17,19 83:16 84:5 86:5 94:4 97:7 109:10 111:13,15 122:18,20 142:19	recruiting 39:10	relayed 142:11
RA 6:8 78:7	reasonable 5:3 27:15 95:6	recommend 102:6	recruitment 38:23	
radar 85:6	reasons 82:19 127:1	recommenda tions 99:25 143:4	redact 149:18	
raise 33:13 120:10 167:23	recall 4:14,18 5:5,9,19 6:17, 21 7:15 15:17 25:5 26:1 29:6,11 31:1 102:23,24 117:19 131:9, 14 138:20 140:20 158:18 161:3 164:2, 10	recommende d 159:2	redirect 24:22 25:1 75:12	
raised 167:24	reason 88:16 112:14 151:7	reconvene 171:13	reduce 108:11	
raises 143:22	receipts 54:18,22 56:4	record 5:17 6:6 13:7 25:9 33:12,22 55:16,17 58:19,22 66:5, 9,22 70:22 73:3 74:20 76:23 130:2 142:17 154:8 166:9	reduction 108:12 149:2, 13 165:11,15, 23,25	
Rajesh 9:15	receive 7:3 19:9 142:25		reference 60:14 63:7	
ran 41:25 69:7 95:13,16,19 96:7			referencing 29:5 124:10	
rape 128:9			referring 76:10	
raped 100:7 128:12			refresh 138:9 155:24 156:8	
rapid-fire 53:13			refuse 170:6, 8 171:10	
rate 117:20, 22,23 119:25 120:1 125:5			refused 86:10 88:15 113:1 133:7 170:17	
rated 145:4			refusing 92:2 110:4 112:8	
re-tweeting 140:19			reg.msu. 93:14 115:11	
reach 48:4				
read 47:8 50:9				

released 12:16,17	rephrase 11:3 17:7 21:6 155:4	101:4 115:3,6	resources 32:11,25 106:1	reverberating 5:15
releases 12:17	rephrased 19:19	requested 20:19,20 52:1	respect 28:25 61:25 66:20, 21 103:20	review 98:16 99:12,13,16, 17 100:1,17 101:5,9,10,22 102:15,17 111:20,21,23, 24 112:3,25 113:8,11,12, 16 133:14 141:4 148:1 161:5
relevance 73:15	replied 68:4 112:16	requests 52:11	respected 145:8	reviewing 102:7
relief 166:16	reply 43:15,16 48:13 51:10 86:10 137:15 162:14	require 99:22, 23	respondent 12:19 140:15, 17 141:7	reviews 99:23,24 100:6
relieved 42:16 92:4	replying 76:24	required 63:11	Respondents 141:9 163:22, 23	revision 149:14
religiously 65:6	report 9:3 11:18,19,23 12:17,25 13:13 23:6,20 24:7,9 30:11 45:7 58:15 59:3,8,11,15, 20 60:14,15, 21 63:24 106:2 113:21 114:7,13 133:14 139:10,14,15 140:3 142:10 147:11,21,22 148:8 149:1,9, 14,16,18,21 150:2,3	requirement 75:18 77:24	responding 110:23	revoked 63:17
reluctantly 112:6	reporting 114:10	requirements 69:16 152:7, 10 153:14	response 56:9,10,11,12, 13 61:15,19 63:9 65:8 89:4,8 101:8 105:24 115:3, 6 120:22	rewriting 23:9,20
remaining 75:12	REPORTER 5:11 33:13 58:9 166:20	reschedule 95:2 96:15	responsibilit y 50:5	rich 104:24 145:10
remarks 105:10	reported 109:24 140:14	rescheduled 28:17	responsible 10:4 51:19 143:11,18	Richard 91:17,20,21 92:7,22 93:2, 22
remember 5:7,25 7:2,8,9, 10,12 8:14,19 9:2,20,25 13:12 30:7 31:5 40:1 43:6 44:23 64:17 75:12 76:11, 16 81:19 82:2 142:8 164:14, 15,19,20	REPORTER 5:11 33:13 58:9 166:20	research 6:8 34:17,21 36:25 37:3,19 38:12 39:5 73:24 85:12 97:17 98:17, 21 99:2 101:3 118:6 119:18, 19 120:7 123:11 126:22 131:17,23 143:2,5,7,9, 21,22 144:7, 10,13,16 145:5 146:4 152:5 153:4, 17 162:22	responsive 20:12	rid 104:18 135:18 149:17
remind 111:21	reporting 114:10	Researcher 37:7	rest 46:12	ridiculous 121:19
reminder 6:22,24	reports 12:11 147:6	researching 119:16,17	restaurant 79:11	rights 46:17, 18
remove 168:6	reprimand 21:24 22:3,4, 7,12,17 23:1, 15,24 24:4,7	reservations 14:22	result 19:10 22:18 137:8 154:22	Rochester 121:6
reopening 161:9	reputation 38:17 125:11 129:2 137:21	reserve 77:23	resulted 108:4	role 37:25
reorganize 107:2	request 51:3 82:5,20 83:19	Resign 149:17	retaliated 141:9	roles 98:16
repair 101:22		resigned 42:19	retaliation 106:5	room 13:4,6 53:13 84:14, 18
repeat 22:13 64:23 91:19 138:7,18 144:11		resolve 94:19	Retire 149:17	root 93:14
repeated 68:6			retired 124:19	roughly 5:4 14:2
repeatedly 160:3			revamped 98:16	

round 121:25	salary 64:3 154:22	scolding 24:5	seminars 85:6	40:13 93:14 143:25 148:3
route 108:19	Sam 138:15	Seawei 161:9	send 35:15 37:16 51:7 55:4,23 67:22, 24 68:1 72:8 82:7,8 86:18 110:24 112:2 113:24 139:3 147:24 149:12,15 150:20 165:18,20 166:8 167:3	serving 102:17
row 36:4	Sasha 27:25 30:2	second-year 152:9	senior 124:14,15,18 160:22	set 95:4
rule 6:18 26:7, 8,9,11 27:11, 13 41:9 71:12, 17	sat 47:11 126:13	seconds 146:8	sensitive 39:17 46:19	sets 20:20
rules 10:18 13:23 18:9,10, 20 25:25 26:3 27:6,7,14,15 28:13 41:6,8 42:5 55:6 66:10,12 77:20 81:6 100:3 105:11, 15 116:14	Saturday 37:22	secretarial 53:20	sentence 140:10,12	settled 115:19 166:13
ruling 91:5 92:16 94:8	save 135:18	secretaries 56:16 93:12 101:24 133:1	sentences 75:11	severity 22:25
run 13:24 27:21 42:5,6 49:4,9 50:15 51:13 65:15 69:20 101:5 104:11 108:5, 17 169:5	scare 106:9, 23	secretary 47:13 51:13, 20 54:4 68:22 80:5 123:12 127:8,10,12, 14 132:13 136:18 160:21,22	separate 10:20 12:3	sexism 27:2,3
run-in 39:22 41:4	scared 117:12,14	section 143:4	September 72:3 140:15	share 168:19
runaround 115:14	schedule 16:19,24 17:15 28:23, 25	secure 41:9	sequence 36:8 37:7	sheet 67:17 134:22
runarounds 111:16	scheduled 90:13 121:22	seek 46:25	sequesteratio n 103:16	sheets 133:3 134:22,24
running 42:23 43:3 108:4	schedules 15:1 16:12,13 17:11 28:5 95:5	Seikel 32:24	series 123:13 124:22 130:9	shocked 49:12 51:11 60:6 93:10 119:10
runs 49:5	scheduling 14:25 28:4,20 94:24	self- respecting 99:15	serve 42:3 144:1	shocker 125:11
Russia 38:19	Schenker 106:12,17 147:4,8,12 150:19	Selman 8:3 25:13,19,20 26:18 27:16 33:17,23 51:22 71:11 97:24 116:8 127:3 134:9 140:17 154:20	served 161:25	shoes 94:23
Russian 28:1 34:15	Scholars 121:4	Selman's 45:9	server 50:22 120:12	short 92:13
	scholarship 69:21	semester 4:25 5:8,21, 24,25 6:4,5,21 14:21 18:9,10, 11 27:13 28:11,15,24 30:4 87:3 95:4,12,13	service 46:6 98:6,7 143:23, 24 144:3	shortly 82:9 93:3
	school 79:10 98:5 110:14, 15,22 137:17	semesters 5:1,3 6:3 79:7	services	shot 102:18
S	Schwartz 91:18,20,21, 25 92:7,23 93:2,23	seminar 85:2		show 60:23 73:20 78:17 81:15 119:9 120:22 133:6, 20 155:3 157:4
S-E-L-M 33:23	Science 35:7, 9 92:5 93:11 94:2 140:14 142:23 143:13			showed 54:19,21 67:23
sabbatical 52:14 53:4 106:14				showing 43:10 56:4 79:8 132:21
				shows 43:25 44:1 60:2 68:24 118:16
				Shu-man 82:25 83:18

shunned 49:25	sixth 81:21,22 83:2	35:13,22 36:17 38:1 48:7 53:1 105:19 123:1, 4 135:2,14,15 151:4 161:9, 10	spoke 49:19, 24 127:5	stated 59:9 159:14,16,19
shut 104:3,5 112:13	sky 42:13		sponsor 78:6	statement 9:23 19:15,19 66:2,14 67:22 90:19,20 150:9
sick 127:2	skyscraper 121:4		spouse 47:22	
side 49:11 115:1,6 167:5	slow 53:15	space 137:23	spring 27:21 46:11 95:4,13, 16,19 96:7 97:17,18 98:2 136:7 154:17, 21	statements 9:19 126:12
siding 93:5	slowly 53:17	spaces 37:8,9 152:20	staff 19:4,9,21 53:21 145:2	states 60:4 91:3
sign 89:21,22 90:2 92:11	small 22:1,19, 23	Spartan 38:14	stage 100:12	status 121:13
signatures 133:14	smart 153:6	spasm 116:19	stand 115:12, 24 117:11	Stay 151:3
signed 90:15, 19,20 92:12 110:5,10 122:14 133:13 146:5	SMITH 13:5 16:6 59:12 61:5 171:19	speak 53:14, 17 156:23 157:2	standard 20:21	step 100:2 116:14,15
significant 23:19	smoother 26:1	speaker 36:3 38:25	standards 117:17	steps 26:20 106:24 128:11 131:2
signs 143:14	smoothly 13:24 101:5	speakers 34:15	Stanford 34:23 35:2 38:2 122:4 131:19	stop 14:8 20:19 55:7 62:12 156:2
similar 88:17 139:16	society 50:3	speaking 20:19 50:7	start 5:18 12:13 28:24 39:20 66:11 81:3 91:6 111:23,24 116:15	stories 115:16
Simon 37:19 109:16	soft 149:11	specific 48:23 57:12 76:8 109:23	started 7:21 19:18 28:15 32:13 45:2 46:9 51:1 64:14 106:19 113:14 140:22 142:1	story 40:17 46:12 67:9,10 72:12 85:21 88:3 89:19 115:1,7 146:20 149:10 160:5,12
simpler 24:2	solely 25:20	specifically 57:12		straight 167:9
simplify 115:5	soliciting 124:20	speech 49:14, 15 88:25 101:19		Strengths 143:2
simply 95:3	solution 94:11	speechless 116:20		strike 31:14 117:18 144:8
single 8:6 21:16 50:8	solved 40:15 46:25	spell 33:21		strikes 143:6, 7
sir 30:16 87:8	somebody's 47:22	spend 75:18, 19 76:13 77:1, 7 79:13 128:19 131:25 135:11,12,13, 19,21 158:9, 10 167:7		strong 47:9, 16 103:11 113:18 119:11
sit 4:6 69:11 71:10 81:7 119:8 141:19	someplace 35:22 135:20 141:19	spending 52:14 85:13		student 9:22 11:1 16:12 18:7 19:9 29:22 39:23 51:18 73:6,22 74:24 75:14, 19,23 77:3,17,
site 124:2	sort 14:25 48:9	spent 135:4,6		
sits 23:17 168:25	sorts 117:3 118:5 143:24	spite 30:15 44:25		
sitting 25:8 69:18 94:18	sound 5:1	split 122:5		
situation 92:6 99:18 100:25	source 134:24			
situations 12:16	sources 35:11 57:7			
	South 135:20			
	sp 8:15 26:12 29:25 32:24			

19 79:12 80:14 81:21 82:11,23 83:2 84:9 92:15 93:6 134:23 135:13 136:7 140:16 150:5, 16 151:6,14 152:1,2,9,25	stupid 146:12 subject 10:22 31:21 subjects 38:22 submitted 155:14 156:20 subsequent 96:3 substitution 170:23 success 40:24 successful 40:25 71:18 77:19 78:4 81:21 84:15 119:25 158:9 successfully 135:19 such-and-such 59:5 sudden 43:2 44:14,20 57:25 116:4 134:16 suddenly 26:9,13 sue 128:22 summarize 80:9 94:7 summary 78:25 141:3 summer 37:14 77:6 143:1 164:5 superior 24:6 132:11 superiors 40:18 supervisor 105:1 supervisory 109:22 supplement	80:17 support 6:8, 11 45:22 57:16 73:23 135:16 141:6 147:24 supported 53:6 supporting 73:25 supposed 43:1 54:8 65:8 97:16 113:9 116:9,22 127:14 134:9 145:2 158:22 161:19 Surbox 123:4 surprise 112:13 surprised 71:17 surround 153:6 surrounds 49:5 survey 42:8, 9,10 43:14,15, 17,21,23,24 surveyed 43:14 swear 33:14 Switzerland 35:21 36:4 144:5 sworn 33:18 symbolically 69:17 sympathy 49:10 system 48:14 100:9,10,15, 16 103:2 142:23 161:25	T tab 15:4 55:9, 10 61:1,2 68:13 70:17 72:23 74:11 77:10 78:18 79:23 81:16 83:14 86:3 93:20 97:5 107:7,8 109:7 111:12 122:13 129:21 157:6, 9,10 163:6,7, 20,21 table 18:21 taking 5:9,19, 25 14:8 16:17 29:6 70:23 71:19 74:23 78:7 89:22 90:3 104:9 106:21 121:3 149:1 152:10 160:10 talk 19:7 32:19,20 36:25 41:12 42:16 47:14 48:9 51:18 52:18 54:2 55:23 72:6 92:20,24 94:16 104:19 110:4 112:8 117:13 127:6 128:10,13 131:8 136:12, 22 146:8,10 150:21 154:13,16 158:15,20 162:18,24 talked 32:17 44:14 81:2 117:3 129:24 130:20 133:1 137:11 147:3 150:4 158:18 162:9 166:4,5 talking 8:24 19:6,8 22:22	29:8 50:1 57:12,24 58:23 59:16 60:9,20 65:15 68:7 70:3 71:6 75:22 91:22 103:13 104:9 106:22 115:17 116:5 121:18 127:8,12 147:9 148:6 149:6,7 151:13 153:3 155:6 161:18 162:21 167:4, 12 169:2 talks 35:22 120:13 tape 134:7 target 50:8 targeting 109:20 task 17:9 taught 27:24 81:20 99:3,4 121:1 170:8, 22 171:1 taxpayers' 65:16 Taylor 135:10 teach 8:20 14:19 26:15 53:2,5,6 85:11,16 86:25 87:4 89:1,3,7,13 97:16 99:2,4 105:1 107:21 116:2 127:4 170:6,8,9,17, 19 teacher 106:13 teaching 15:21 16:13, 19,23 17:11, 14,16,18 28:5, 16,17 53:4 57:6,17,18 63:4 85:12,14,
---	--	---	---	--

15 86:23 87:7, 9,10,13,15,23 89:9 90:8 97:14,24,25 98:3,4,8,11, 16,20,22 99:13 101:1 105:6 108:1, 12 114:5 118:6 119:20, 21 143:23 144:7 146:19, 20 161:21 technically 89:12 131:13 153:12 telling 29:25 43:7 64:17 68:21 69:4,19 72:12 75:1,9 76:15 77:17 80:22 81:22 84:7,9,19 85:15 88:3 98:4 101:18 108:8 114:13 122:6 132:3 134:13 139:8 149:10 151:2 157:22 160:9 162:6 165:3 167:6 tells 48:13,15 52:3,8 81:22, 24 127:13 148:7 149:16 154:13 ten 7:6 15:14 29:20 39:22 87:11 89:13 118:19 144:6 157:1 169:18 ten-minute 129:13 tend 73:20 tense 13:12 tenth 128:10 Tenure 142:23 tenured 34:3	term 77:2 terminated 65:11 terms 130:20 148:7 terrible 49:4 104:20 105:10 124:24 Terry 18:18 48:15 86:12 87:13 89:18 103:7,12,14 111:15 114:3 168:23 testified 7:15 10:15,19 13:9, 12,23 27:7,20 28:2 29:18 30:19 33:18 39:9,19 48:19 64:7 66:6 80:5 99:11 101:24 103:10 121:12 125:6,18,20 130:5 132:12 134:2 137:3 145:16 170:19 testify 10:23, 24 33:6 49:7 90:15 121:22 123:6 124:4 137:5 143:17, 19 testifying 10:12 11:22 25:5 26:1 29:7,11 30:7 48:19 58:17 91:2 117:19 130:7 140:21 testimony 4:14 6:17 9:15 11:24 25:25 33:14 45:14 66:5,22 90:19, 24,25 159:12, 18 163:12,13 170:25 Tetra 32:24 thanked	165:9 theorem 82:21,22 thesis 69:17 82:21 152:13, 17 thing 5:16 36:1 41:2 43:20 48:17 53:23 70:3 71:9 77:19 111:16,19 112:23 114:12 115:22 120:4 129:15 134:1 137:25 146:11 149:10 162:3 things 13:24 26:1,19 27:16 30:12,15,20 32:23 35:12 36:9,19,23 39:16,19 41:4 42:1,7 45:7 46:10 48:9 49:15,19 50:14 51:25 53:21 59:23 62:22 64:16 71:22 101:23 102:2,9 106:16 107:16,18 110:21 114:25 115:16 121:5 130:20 136:23 142:16 143:6, 25 144:17 153:10 165:4, 7,14 168:14 thinking 22:8 112:15 113:5 165:16 Thirty-seven 34:2 thought 44:2 45:12 49:20 109:3 110:23 113:15 114:1, 8 115:20 144:18 146:14 152:16 164:23	165:3 thousand 52:6 77:4 thousands 68:8 69:5 76:13 three-person 165:2 threshold 96:6 throwing 136:15 Thursday 4:2 85:7 133:18, 19 ticket 153:3 Tigasis 53:1 tiled 37:10 till 48:2 65:7 91:5 117:5 time 4:5 7:6, 13 8:3 14:6,14 16:23,24 17:2, 5,14 18:12 20:18 21:15, 16,17 27:16, 18 28:11 30:2, 10,22,25 31:3 33:24 36:10 39:12 40:21 41:3 45:8 47:9 48:6 51:2 52:2 55:4 56:4,19 57:5 60:9 62:10,24 65:7, 21 66:12 67:17,20 70:7, 10 71:8 75:1 76:7,12 80:21 81:5 84:25 86:14 89:9 91:22 92:13 98:12 100:19 101:25 103:21 108:6 114:5 116:3 120:4 127:23,24 128:9,10,19 129:3,11 132:5 134:12, 21,22,24 135:8,16 136:5 137:23 142:7,18 146:21 152:7 154:7 158:25 161:7,25 timely 95:5 times 48:3 64:23 65:2,3 69:2 75:5 86:14,21 102:23 146:23 151:21 154:1, 5 168:18 tinkered 39:18 tired 72:1 127:2 159:16 title 141:18 163:11 titled 143:5 today 75:14 88:21 131:3 170:2 told 5:2 18:17 20:12 21:2 23:5 26:12 39:23 40:2,3,9 41:19 43:7 45:4,17 46:6, 15 47:15 54:24 57:10 59:4,22 63:23 64:18 67:18, 24 69:7 71:7, 23 72:9 76:9, 14 82:6 87:13, 19 88:10,12, 23 89:20 91:23 100:24 101:2 107:18 108:1 111:17, 19,25 112:19 113:4 114:3,7, 12,13,14 115:22 116:8 117:11 123:18 132:16 133:17 134:9 135:11 137:11 145:21
--	---	--	---

146:19 147:7 148:2 149:12 151:3,5 159:4, 22 160:5 161:10 162:4, 11 165:10 Tom 122:13 Tomlinson 103:9,12 tomorrow 121:23 169:22 171:18 tons 154:12 top 44:16 84:18 85:10, 11 120:11 topics 5:20 6:1 17:20 26:15 39:17 84:25 85:6,8 90:4 topologist 100:22 124:12,14,18, 19 146:13 topologists 119:6 124:14 topology 34:13 35:7 37:20 39:5 52:18 84:24 85:2,10 100:21 Tops 5:9 total 132:21 totally 89:5 93:7,18 113:22 135:3 touch 53:21 Tracy 147:22 training 11:2 152:7 transcript 11:16 transfer 113:22	treat 76:20 treated 49:23, 25 treating 45:16 treatment 117:6 triangulated 152:22 tribunal 156:3 trick 169:8 trouble 5:12 51:3 64:19 true 4:24 7:17 9:23 10:7,14 11:14,15,20, 23 14:18 19:3, 20 58:4,5 130:12 146:6, 17 149:22 trust 166:25 trusting 55:5 truth 33:15 129:7 138:1,4 truthful 88:8 truthfully 55:25 67:25 Tuesday 84:25 85:7 tuition 94:10, 14 tuitions 65:16 Tulane 123:9, 19 125:9,10 Turkey 6:12, 16 38:20 131:25 144:5 Turkish 59:23 turn 46:23 117:5 134:17 turned 166:24,25 turns 103:11 tweet 137:5,8, 14,15 138:6,7,	8,20,22,23 139:11 140:3, 21,25 142:2 tweeted 138:24 tweets 139:4 Twitter 137:6 138:24 140:16,19 type 70:5 types 69:25 typical 14:23 typically 14:5,13 19:5, 11,22 U u-l-u-t 33:24 UCFA 103:5 UCLA 38:2 ultimately 58:2,14 95:13 unacceptable 32:4 170:11 unbeknownst 51:21 unbelievable 101:14 unclear 149:6 underenroll 9:21 underenrolle d 7:13 underenrollm ent 8:1,10,12 9:18 95:1 undergrad 27:9 undergraduat e 97:20 understand 14:9 16:10,20 17:5 21:5,12	23:22,24 37:4 38:7 49:14 59:21 61:25 63:22 73:18 79:1 121:15 125:16 132:23 151:25 153:17 158:1 167:17 understandin g 5:12 12:25 20:6 23:3,12 39:3 84:10 108:14 110:10 understands 10:17 24:2 understood 62:8 unethical 109:21 unfair 20:21 146:11,15 unhealthy 103:16 uniformly 28:13 unilaterally 120:14 unintentional ly 123:16 union 32:15 United 60:4 universities 99:21,22 131:18 university 5:24 28:13 32:16 34:1,23, 24,25 35:2,3 38:13 42:2,3, 4,5 44:9 45:11,12,13 49:9 50:5,6 52:15,17 53:22,23 54:1 59:24 65:15 69:11 74:23 79:12 82:9,10 85:10 89:9,11 98:13,15	100:5,8,12,23 101:21 103:5 104:14 110:16 117:16,17 121:6,9,23 123:9 127:24 131:18 139:1, 2,5,9 142:12 143:11 144:9, 12,20 145:1 146:3 148:5 151:1 168:11 169:5 unlocked 167:13 unreasonabl e 27:17 untrue 146:22 update 65:19 upper 99:21 upset 165:6 upstairs 55:4 160:9 urgently 110:2 usage 50:12 usual 84:25 V Valerie 140:10 validity 47:18 56:1 valuable 35:18 Vandyke 131:19 Vaninsky 110:8 147:13 149:8 Vasquez 143:17 Vegas 43:16 vehos 35:22
---	---	---	--	---

verbalize 102:2	Volberg 27:25 30:2	week 36:6 42:17,22 101:2 139:13	18:15 20:2 21:3,7,21,23 22:3,17,25 23:6,7,9,13, 20,23 24:6 30:7,23,24 31:8,9,15 40:2,3,14 41:18 42:12 43:2 44:16,17, 18,21,25 45:5, 7,15 46:9 59:18 69:19 70:25 75:23 78:22 79:8 80:15 88:13 92:17 102:15, 20 139:17 147:4,7,12 150:19	161:24
verify 56:1	voluntarily 113:23	weeks 17:18 30:4 37:21 88:11,12,22 112:22	workshop 35:1	
versus 101:10	von 40:13		workshops 35:3	
vet 47:5	vote 43:25	Wei 75:13	world 38:19 40:19 84:22 118:3 122:4 123:22 124:25 125:8 126:15 127:22 132:1	
vetting 41:10	voting 43:17 116:18	well-known 45:18 124:12		
vice 87:10,15 97:13	W	Wemple 54:3, 9,22,24 57:1 73:4 76:11 80:6 132:21		
victim 18:20 128:9	wait 26:16 41:10,20 91:5 133:17,18	Wemple's 54:21 132:4 160:13	world- renowned 40:8	
victims 18:21	waited 88:22 117:5		worried 156:9	
victims' 115:16	waiting 159:11 165:5	WHITBECK 16:1,3,5,7,9 19:1 33:2 55:16 60:13, 20,24 93:22 108:25 156:22,25 163:25 168:1 169:14 170:14,17,21	worry 69:4 71:16,24 158:17 160:8, 9 162:4,5	
view 145:12	walk 132:3	wholesale 100:15	worse 49:3	
violate 44:11 139:15,18	walking 60:10	widely 13:1	worst 162:20	
violated 23:7 141:7	Wang 161:9	wife 161:14, 18,20	worth 72:11 91:8	
violence 134:17	wanted 15:13 28:15 41:5 52:19 58:8 69:18 84:17 89:3 93:6 154:8 161:12	wild 134:19	worthy 43:10	
visa 59:6 63:6, 11,16,20,21	warn 52:25	Williams 78:6 79:2 82:17 94:9 150:5 151:9,13,18 158:23 159:22 160:17	word 76:17 125:16 140:7 157:1	write 32:14 65:8,9 88:5 101:15 105:9 110:3,17,24 112:4 126:17 127:16,18 134:5 137:19 167:9 168:19
visit 35:10 36:25 40:11 43:7 44:23 54:1 65:7,8 135:22	warned 45:8, 14	wholesale 100:15	words 72:3 105:14,15 128:25 157:17	writes 105:13 146:18,19
visiting 126:19	Washington 40:18	Williams' 73:24	work 26:14 32:6 40:12 46:5 71:14 95:2 125:10 145:18,20 151:8 152:17 153:19 161:23,24	writing 23:9, 23 24:16,18 47:25 69:16 114:7,14 123:12 137:14,15
visitor 51:17, 18 52:13 54:15 56:2 60:4 135:11, 12,13 136:10	watch 102:18	win 87:3 88:8	worked 40:13 104:21 116:21	written 50:10 55:14 56:17 63:24 91:12 117:24,25 123:8 127:20 155:16,24 171:8
visitor's 57:19 63:4	ways 118:5	witnesses 20:12 62:23 90:14,18 91:1 129:17	working 18:1 78:8 124:17 148:5	
visitors 52:25 54:14 64:18 76:17,18 131:25	Weaknesses 143:3	Wolfson 8:3 11:14,22 13:1	workings 45:10 50:21	
Vladimir 57:23	Weatherstree t 123:1		works 39:11 75:24 89:9	
voice 90:17 134:3,4 168:1	web 126:18			
	website 98:10 109:24 110:24 125:25 126:1 127:2,21 128:1,16			

wrong 40:23
43:24 44:3
45:18 49:20
59:7 60:6 65:9
71:2 75:7
107:16 117:21
142:4,5
158:13,14
164:25 165:13

wrote 32:10,
11 48:16 88:6
105:10
112:15,22
113:11,13,21
119:17 132:8,
21

Y

year 14:7
26:6,16,19
34:25 35:1,12
36:5 37:15
38:24 45:6
47:7,20 52:3,7
74:18 79:9
98:5 120:14
123:2 150:11
151:18

years 14:15,
16 34:2 35:21
36:3,10 39:2,
10,20,22 41:3
42:3 46:19
48:3 53:20
69:11 70:1
71:8 76:16
81:6 87:11
98:13 102:6
123:4 134:15
165:7 167:8

yell 127:10

yelling 57:24
116:5,7 138:2

yellow 169:1

YERMAK
62:8 157:13

yes-or-no
21:1 170:4

yesterday
4:14 6:17

30:16 51:11
136:24 137:3
143:17,19

yesterday's
125:16

yield 138:3

Yildiz 140:15,
16

Yildiz' 140:19

York 37:19
38:5 74:1 78:2

Youatt 109:17

young 100:22
134:14

Z

zeros 99:19