

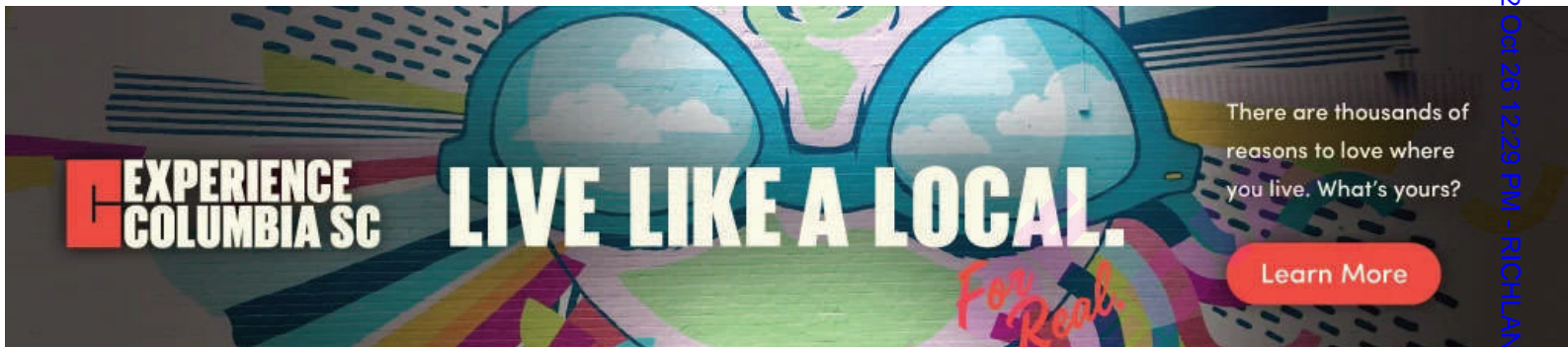
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Exhibit “A”

Former Student Who Sued USC:  
System for Harassment Complaints 'Revictimizes the Victims'

December 9, 2020

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# Former Student Who Sued USC: System For Harassment Complaints 'Revictimizes The Victims'

What happened to her in Italy was bad, but the way USC treated her when she complained was much worse, she said.



Published 2 years ago on December 9, 2020

By **Mandy Matney**

UNAPPROPRIATE MARKING





**A** year after her [harassment lawsuit](#) against the [University of South Carolina](#) settled, [Allison Dunavant](#) still carries the weight of an experience she hardly ever talks about — an experience that changed her adult life and warped the way she sees the world.

She's alarmed as USC continues to employ [David Voros](#) — the School of Visual Art and Design (SVAD) professor who she says harassed, intimidated and isolated her during a horrific 2016 study abroad trip to Italy when she was a graduate student.

Voros allegedly engaged in sexual acts in front of Dunavant, sexually harassed her, then deprived her of food when she wouldn't comply.

*"What does it take to fire a tenured professor?" she asks.*

Dunavant is especially concerned after two [USC SVAD instructors](#) recently filed a lawsuit with "the same complaints and concerns, repeated" about Voros and the university's handling of sexual harassment complaints.

*"How many women have to complain before they fire him?" Dunavant asks. "Why are they still protecting him?"*

She's troubled as she reflects and remembers all of the times university officials made her feel like *she* was the problem — and allegedly stonewalled her on multiple occasions after she reported the harassment.

"Students who have been sexually assaulted on campus have to go through the same people and navigate the same channels I did — and that really worries me," Dunavant told FITSNews. "Especially grad students ... they have even fewer options to get help."

Even after USC agreed to pay Dunavant **\$75,000** in a settlement, she still doesn't feel like she got justice in her case.

"I hated the idea of the settlement, because it wasn't about the money — I don't want people to think I was in it for the money," Dunavant told FITSNews. "The lawsuit was a last resort, after exhausting all of my options the university offered grad students with formal complaints."

She said the process of suing — after the two-year grind she spent sounding the alarm bell with the university — was slow, painful and isolating. Eventually, she reached a point in 2019 when she wanted to move on with her life and just wanted to get it over with.

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“In terms of justice, I don’t feel like I got what I wanted because the people who enabled this to happen should have some kind of consequence,” she said. “Like David Voros, his wrongs are the most glaring — but he’s not the only problem. The problem is the whole system. The way they treat victims, it’s terrible.”

Since she filed her original harassment complaint, Voros has made more than **\$315,000** from his [university salary](#).

Dunavant is unsettled, now knowing that the problem is much greater than Voros, the School of Visual Art and Design, and even beyond the University of South Carolina.

*(Click to view)*

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*Allison Dunavant photo by Chad Savage*

“Ironically, the systemic issues that are prevalent at USC in their inability to accept and resolve complaints, are also prevalent in our legal system,” Dunavant [said](#).

She hopes her story helps change that — or at the very least, sheds some light on a system that made her feel alone, self-conscious and damaged for so many years.

## **A Horrific Study Abroad Trip**



When Dunavant thinks back to her study abroad trip in Monte Castello di Vibio, Italy, she has a hard time finding the words to describe what happened. She's still processing what happened to her, because frankly, the truth is hard to accept.

"Honestly, it was so crazy, like soap-opera crazy," she said. "Like there is no way anyone would believe how nuts the situation actually was."

Her lawsuit describes an unfathomable experience that began in May 2016, when she and two other students agreed to go to Italy with Voros three weeks before the USC study abroad program — ostensibly to help him set up the school before students arrived.

Voros told the students he would provide them with meals as long as they helped him prepare the supplies and complete other tasks related to the International Center For the Arts (ICA), a company owned by Voros, the lawsuit said.

"When we got there, it was nothing like he described," Dunavant said.

She said the working conditions were horrific — she had to scrub feral cat pee off the floor and furniture, among many other dirty jobs. The living quarters for students at the ICA were littered with scorpions, rodents, and other creatures.

*(Click to view)*

LUNA SHERMAN



Dunavant's photos of her living and working conditions in Italy.

“It looked like the building had been abandoned for some time,” Dunavant said.  
“There was no heat or air, the water in the building was undrinkable.”

The “provided meals” were served by Voros at his home — which made the students entirely dependent on the professor while they were in a foreign country, Dunavant said.

A few days in, another female student arrived and moved her stuff in at Voros’ home, unlike the other students who were staying in the ICA building, per the lawsuit.

One evening, as Dunavant entered Voros’ home to get dinner, she said she walked in on Voros and the other female student having sex.

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After this, Voros' attitude toward Dunavant shifted entirely, she said. The late-night dinners he'd host — the only option for eating — became increasingly more uncomfortable.

(SPONSORED CONTENT - STORY CONTINUES BELOW)



During meals, he'd touch her legs and face in a way that was very unsettling, she said.

Then, he started to make sexual comments, according to her lawsuit. He'd say things that indicated if she was "more like" the other female student who was having sex with him, things would be much easier for her on the trip.

After several bizarre and uncomfortable incidents where Voros and Dunavant disagreed, Voros threatened to kick her out of the program. He said he would call the police to arrest her for trespassing on his property, the lawsuit said.

“I was in a foreign country and didn’t know what he could do to me,” she said. “I was scared.”

He ordered her to stay in her room — with bars on the windows — until she changed her attitude toward him, according to the lawsuit.

“He told me I wasn’t allowed to go to his house for food,” she said. “Thankfully, another student would sneak me food. It was the only way I could eat for a few days.”

As soon as she could, Dunavant called her parents and told her she was concerned for her safety. Her parents contacted the university immediately.

*(Click to view)*



*Photo by Chad Savage*

For days, Dunavant's mother begged officials to make arrangements to remove her from the situation safely and pay for her flight home.

During these encounters, USC officials informed Dunavant's parents that the trip was not sanctioned through the university, which wasn't at all how Voros presented it and described it through his USC email.

Finally, university officials reached an agreement and helped Dunavant leave Italy, but the nightmare was far from over.

### **'Revictimizing The Victim'**

Soon after she arrived home from Italy, Dunavant began the process of filing a formal complaint with the University of South Carolina — a first step in what felt like a long uphill battle against a giant well-oiled machine.

"From the very beginning, I was treated like I was the problem and the university made it very hard to even file a complaint," she said. "The complaint process felt more like a system to run you into wall after wall until you get too tired and too frustrated and you give up."

Dunavant said at every step, she felt that the complaint process was "revictimizing the victim."

"For starters, there really aren't any avenues for grad students to voice their concerns like there are for undergrads," she said. "Even if there were, I don't think (USC officials) would listen."

When she emailed USC ombudsman **Dale Moore** to see where to file the complaint, he "responded by stating he cannot provide information or resources on making a

complaint or grievance or counseling until he deems a complaint is warranted,” according to the lawsuit.

This was one of many roadblocks Dunavant ran into while trying to formally warn the university about her professor.

She filed her first formal complaint against Voros on June 15, 2016.

Months passed, and Dunavant said she was left in the dark throughout the entire investigative process. In the meantime, her academics suffered as she scrambled to change her schedule and classes to avoid Voros at all costs.

Finally, USC officials concluded their investigation (*below*), and determined that there was not enough evidence to support Dunavant’s claims that Voros violated university policy.

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**The questions in this matter are as follows:**

- Is it more likely than not that the Complainant was subjected to gender-based harassment?
- Is it more likely than not that Complainant was subjected to gender-based discrimination?
- Is the evidence in support of the claim of harassment and discrimination weightier than the evidence against the claim?
- Did the Charged Party use the word "B\*\*\*h" in referring to the Complainant?
- Does the use of a single gender-based expletive constitute harassment?

**v. ANALYSIS**

Based upon our review of statements from the Complainant, the Charged Party, and the witnesses, there is not sufficient evidence that it is more likely than not that C was treated different from the other participants based upon her gender. Further, C contends that Charged Party referred to her as a "B\*\*\*h". Charged Party disagrees and states that while he does not remember referring to C as a "B\*\*\*h" he may have said on one occasion that she was acting "B\*\*\*hy". None of the witnesses report or confirm they heard Charged Party used expletives towards Complainant. Finally, EOP must conclude that if Charged Party referred to Ccomplainant as "B\*\*\*hy" it was certainly inappropriate but does not rise to the legal level of harassment or discrimination. A single use of the expression is neither pervasive nor severe.

**VI. CREDIBILITY ASSESSMENT**

The Office of Equal Opportunity Programs has not discovered any information or evidence that adds to or takes away from the credibility of either of the parties.

**VII. INVESTIGATIVE FINDINGS**

In this case, using the preponderance of evidence standard, there is not sufficient evidence that Complainant was "more likely than not" subjected to harassment or discrimination as defined by EOP 1.03 or STAF 6.24; or any violations of the "Student Non-Discrimination and Non-Harassment Policy" at stated in (STAF 6.24), perpetrated by the Charged Party.

USC - 0346

The investigation focused a lot on whether or not Voros called Dunavant a b\*tch, which she felt was a minor claim among the many she listed in her complaint.

"I just felt frustrated and let down, like I was just running around like a chicken with my head cut off trying to get someone to listen and do something about it and no one was doing anything," Dunavant said.

She tried to appeal the university's decision on the first complaint, and former USC president Harris Pastides made the final ruling to reject her complaint.

“Later, I found out that Pastides is friends with David Voros,” Dunavant said (this statement is also made by a teacher in another lawsuit). “So all the way to the top to the highest administration of the university, there are these relationships that prevent the university from acting on behalf of the well-being of their students.”

For the next two years while she was in grad school, Dunavant said she saw a number of USC officials who dismissed her claims, including: current SVAD **Chair Laura Kissel**, former SVAD Chair **Peter Chametzky**, and assistant director of the EOP **Carl Wells**.

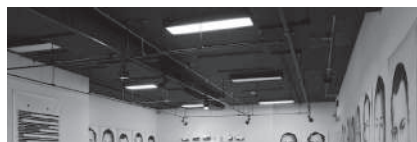
While she was fighting the system, Dunavant said she felt pushback at every turn. The harassment felt like it was coming from all angles, including her SVAD teachers.

“The way I was treated by Voros and other faculty made me feel like I was nuts to the point where I was questioning the validity of my experience in Italy and asking myself what actually happened to me,” she said. “Looking back now, I know I had every right to complain, but at the the time, they just made me feel ashamed and embarrassed. I just wanted to succeed and do well in grad school and get through it. “

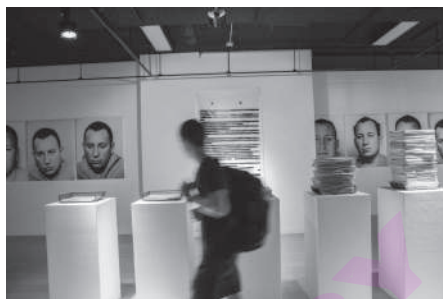
SVAD instructor **Jaime Misenheimer** said in her lawsuit that Voros pressured her to give Dunavant a bad grade in her class in August 2016.

Dunavant said Voros told other staff members that she had a manic episode in Italy and made up the details about the trip. She said this interfered with virtually her entire graduate degree education all the way up until her thesis.

*(Click to view)*







Dunavant's thesis gallery "Culpability"

"My thesis, objectively, was successful and had the most people attending my gallery show out of all the candidates, but several faculty members wouldn't sign off on my thesis," Dunavant said. "We found out through deposition that David (Voros) was good friends with the faculty members who wouldn't sign off on my thesis. So, the harassment extended to trying to derail my actual career," she said.

## Moving Forward

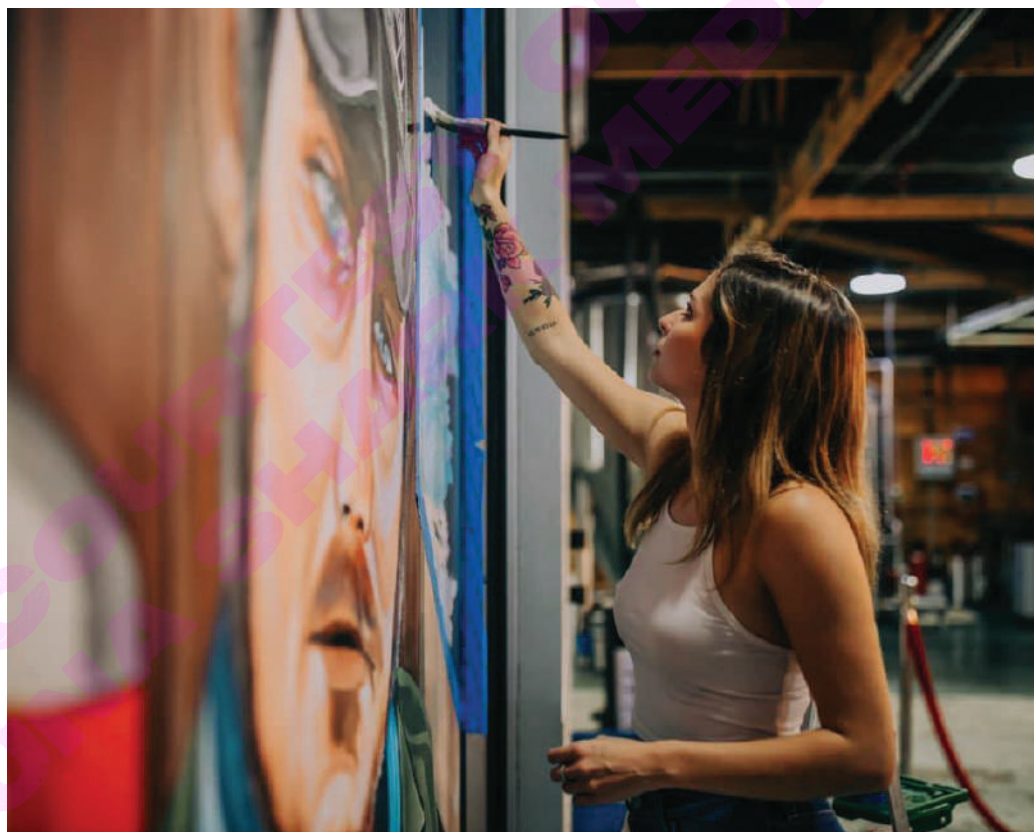
After graduating in 2018, Dunavant distanced herself from both academia and art, and instead tried out a couple corporate jobs that had nothing to do with her graduate degree.

But when her lawsuit settled in late 2019, she realized that it was time to take charge of her career that had been derailed by Voros and the system for too long.

“I wasn’t going to let someone who was trying to take down my career be the end of my career. Instead, I used it to fuel something better,” Dunavant said.

She used the settlement money to start up her own freelance art business in Charleston, South Carolina.


*(Click to view)*




*Allison Dunavant paints a mural in Charleston, South Carolina Chad Savage photo*

“It really pushed me toward the path I didn’t know I wanted to be on,” she said.

And while university officials might not have listened to Dunavant’s concerns, her case has sparked several student protests and outrage in the SVAD school.

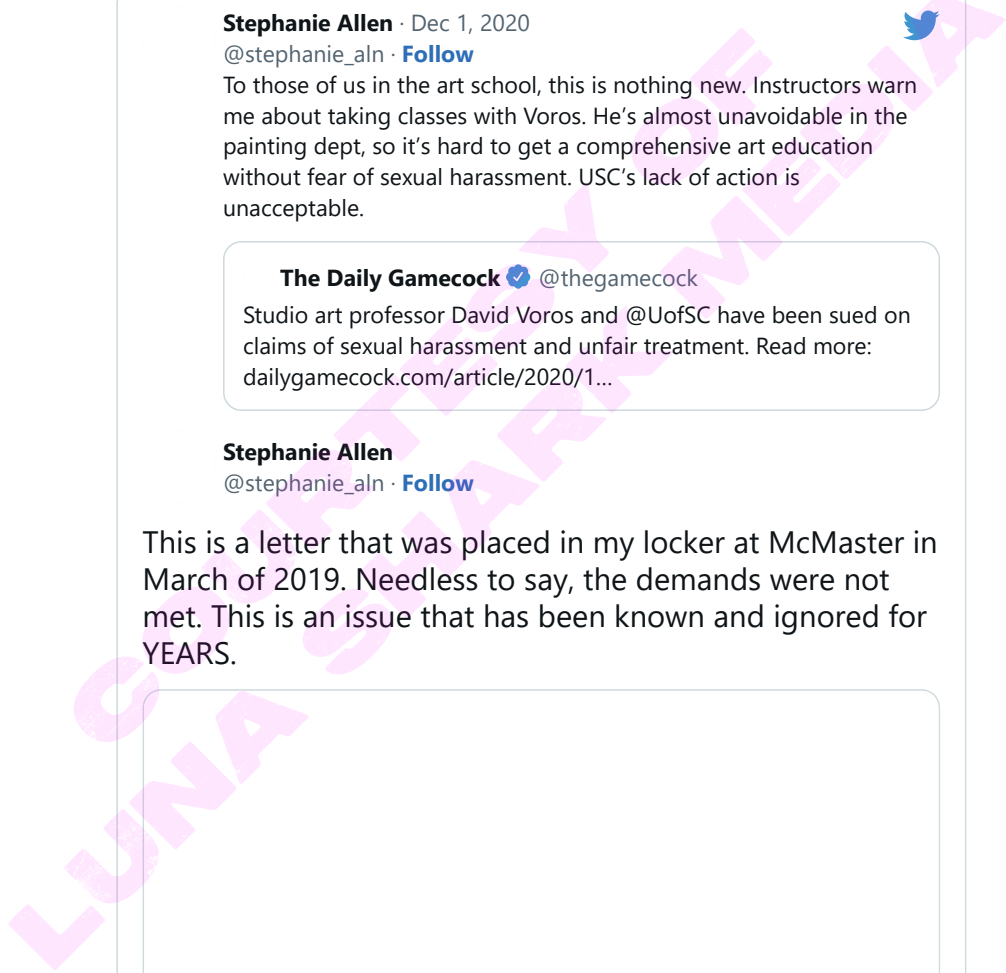
**Stephanie Allen** · Dec 1, 2020   
@stephanie\_aln · [Follow](#)

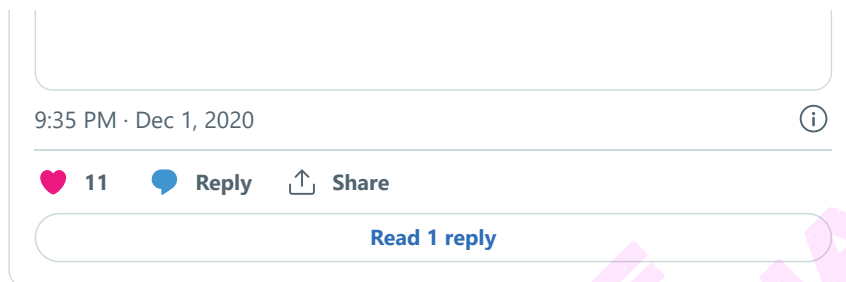
To those of us in the art school, this is nothing new. Instructors warn me about taking classes with Voros. He’s almost unavoidable in the painting dept, so it’s hard to get a comprehensive art education without fear of sexual harassment. USC’s lack of action is unacceptable.

**The Daily Gamecock**  @thegamecock  
Studio art professor David Voros and @UofSC have been sued on claims of sexual harassment and unfair treatment. Read more: [dailygamecock.com/article/2020/1...](https://dailygamecock.com/article/2020/1...)

**Stephanie Allen**  
@stephanie\_aln · [Follow](#)

This is a letter that was placed in my locker at McMaster in March of 2019. Needless to say, the demands were not met. This is an issue that has been known and ignored for YEARS.





“I wish USC would look at the way they handle these complaints in terms of protecting students,” Dunavant said. “At the very least, they could recognize these three lawsuits and realize that David Voros is harmful to students and teachers.

FITSNews reached out to University of South Carolina officials to ask a number of questions about Voros, Dunavant’s lawsuit, and policies for harassment complaints.

USC spokesperson **Jeff Stensland** told FITSNews “the university typically doesn’t comment on active litigation,” and declined to answer our questions — despite the fact Dunavant’s case has been closed for more than a year.

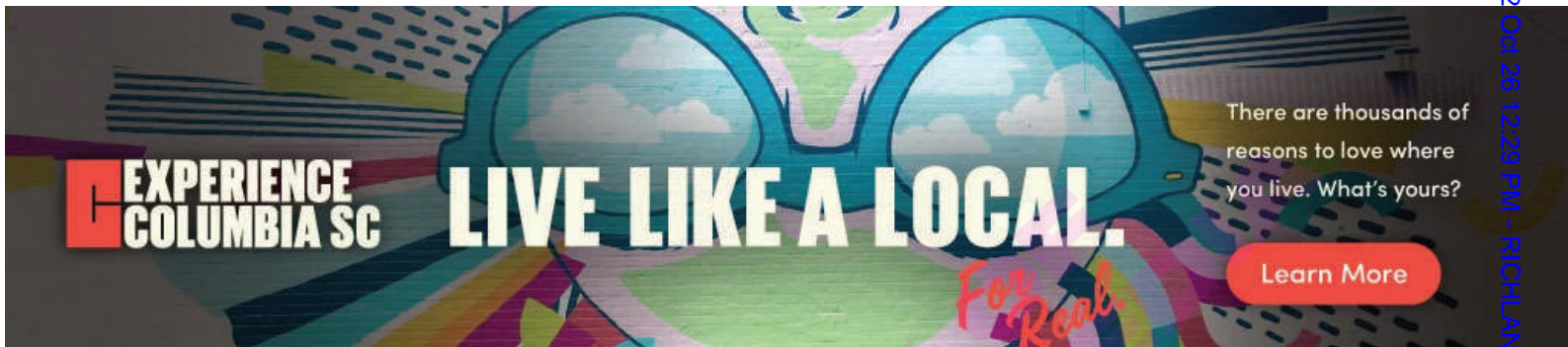
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**ABOUT THE AUTHOR..**

'You Must Listen to Survivors of Abuse':  
USC Protestors Demand Professor Be Fired

March 4, 2021

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SC

# 'You Must Listen To Survivors Of Abuse': USC Protesters Demand Professor Be Fired

They delivered a letter to the USC President Thursday.

Published 2 years ago on March 4, 2021  
 By **Mandy Matney**

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A

group of University of South Carolina ([USC](#)) students hasn't forgotten about the professor who was sued three times for sexual harassment — and they are making sure president **Bob Caslen** doesn't forget either.



The group — named “[Coalition to Fire David Voros](#)” — hand delivered a [letter](#) to Caslen’s office at the Osborne Building in Columbia, South Carolina the Thursday.



The letter demands that the university terminate the tenured art professor and change the system that enabled his alleged behavior.

Students carrying large “FIRE VOROS” signs protested Thursday afternoon outside of Caslen’s office, SGTV News 4 first reported. The group of USC students then entered the administration building to give the letter to administration.

**News 4**  
@SGTVNews4 · [Follow](#)

RIGHT NOW: A group of students are gathering in front of the Osborne building on the U of SC campus to demand the firing of School of Visual Arts and Design Professor David Voros.

Watch on Twitter

12:46 PM · Mar 4, 2021

[Read the full conversation on Twitter](#)

99 [Reply](#) [Share](#)

[Read 3 replies](#)



The letter to Caslen included the same demands as the group’s [petition](#) —which has over 2,500 signatures since it was published in December.

The students are demanding the university not only fire Voros, but remove two School of Visual Art and Design (SVAD) faculty members — former SVAD director **Peter Chametzky** and current SVAD director **Laura Kissel**.

The group is calling for a “complete overhaul” of the Equal Opportunity Program (EOP) while “working to build a university which protects students and faculty instead of abusers.”

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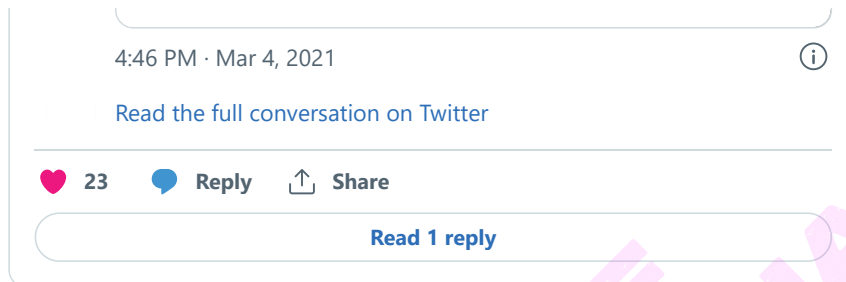
Just five days after the group published their petition in December, USC removed Voros from his classroom duties — but that didn’t come close to fixing the issues students are concerned with.

“This action does not address the fundamental problems at the School of Visual Arts and Design or the University of South Carolina,” the letter said. “The silence from your administration in the intervening months since his reassignment has been deafening.”

On Thursday, as students gathered outside of the Osborne Building for the protest, USC student **Lauryn Workman** read the letter to the crowd.

“You must listen to survivors of abuse and act on those allegations,” the letter said. “David Voros and those like him have no place at the University of South Carolina and we call on you to advocate for his immediate removal and support an overhaul of EOP.”





The USC students were quickly kicked out of the building by administration for allegedly disrupting education, but they were able to give the letter to the front desk.

## The lawsuits

The coalition was formed in light of recent media coverage on the three lawsuits against Voros and USC.

In Decemeber, SVAD instructors **Jaime Misenheimer** and **Pamela Bowers** filed two lawsuits against the University of South Carolina and professor [David Voros](#).

But one year before those lawsuits were filed, USC settled [Allison Dunavant](#)'s lawsuit with "the same complaints and concerns" about Voros and USC administrators, Dunavant told FITSNews in an exclusive interview in December (*click the photo and link below to read Allison's story*).

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**RELATED: Former Student Who Sued USC: System For Harassment Complaints ‘Revictimizes The Victims’**

Dunavant said Voros harassed, intimidated and isolated her during a horrific 2016 study abroad trip to Italy when she was a graduate student.

All three women describe similar stories — they allege Voros harassed them and the university continuously protected him when they reported his behavior.

“From the very beginning, I was treated like I was the problem and the university made it very hard to even file a complaint,” Dunavant previously told FITSNews. “The complaint process felt more like a system to run you into wall after wall until you get too tired and too frustrated and you give up.”

While [USC does protect tenured professors](#), it is not impossible to fire them. One of the reasons for firing a tenured professor at USC is “misconduct related directly and substantially to the fitness of the faculty member in the professional capacity as teacher or researcher,” according to the faculty manual.

Voros is still drawing a salary from USC, even though he’s been removed from the classroom.

In 2019, USC agreed to pay Dunavant **\$75,000** last year in a settlement for her lawsuit. Since she filed her original harassment complaint, Voros has made more than **\$315,000** from his [university salary](#).

“It’s time for USC to do something, say something...anything,” Workman said Thursday. “Why are our tuition dollars still paying a predator’s salary? Why won’t the administration address our demands?”

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USC Student Accuses History Professor  
of Sexual Harassment and Abuse in New Lawsuit

March 23, 2021

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SC

# USC Student Accuses History Professor Of Sexual Harassment And Abuse In New Lawsuit

Another lawsuit accuses USC of mishandling  
sexual harassment complaints.





Published 2 years ago on March 23, 2021

By **Mandy Matney** 

For the third time in five months, a woman who claims she was sexually harassed by a professor filed a lawsuit against the University of South Carolina (USC).

In a lawsuit filed Monday, **Mary Elizabeth Johns** accuses history professor and Faculty Principal of Maxcy College Dr. David Snyder of sexual harassment, grooming and abuse from 2018 to 2020.

Johns filed the lawsuit against USC, Snyder, and former USC president **Harris Pastides** in Richland County court.

Snyder was removed from all campus activities and responsibilities including teaching and his duties as faculty principal, the State reported Wednesday. He is the third USC professor recently removed from classroom duties after being accused of sexual harassment.

*(SPONSORED CONTENT - STORY CONTINUES BELOW)*

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Johns was attending class at USC in Columbia, South Carolina in the spring of 2018 when the harassment began, according to the lawsuit. She was also helping care for her mother who had breast cancer at the time while grieving the loss of another family member.

Snyder, who was Johns' professor at the time, started giving her "unexpected attention," according to the lawsuit.

"Snyder saw the vulnerability of Johns as someone who had been providing caretaking services for terminally ill family members," the lawsuit said.



David Snyder

Snyder “coaxed” Johns to visit his house by saying he wanted to help her deal with her grief, according to the lawsuit.

At first, Johns thought Snyder was trying to help with the trauma in her life. According to the lawsuit, she shared personal details with Snyder about her PTSD.

But the relationship took a turn, according to the lawsuit.

“After multiple visits to Snyder’s house (under the guise of mentor), Snyder tried to touch and kiss Johns,” the lawsuit said.

The professor-student relationship escalated and got more complicated, according to the lawsuit.

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Maxcy

“Snyder continued to cajole Johns about entering into a sexual relationship even though he was her professor, he knew she suffered from an emotional disability,” the lawsuit said.

Then Snyder started sending Johns lewd emails and the relationship became sexual, according to the lawsuit. Snyder was married at the time.

As things became more intense, Johns “grew increasingly alarmed by Snyder’s behavior and cut off contact” with the professor in her chosen degree department, the lawsuit said.

Snyder then sent Johns 184 emails (*see example below*), according to the lawsuit.

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... and that means that if a little fantasy, a little rife playing, or a string of orgasms would help, at least take your mind of things, I'd be delighted.

But I'm also happy to just listen, for however long, to sit with you, to make an omelet. I love you so much that if you need me to slink back into the shadows to find a better place for your healing, I'd do that. I'd be the girlfriend that holds your hair when you'd have too much to drink. And I can be the lover that holds you tenderly, too.

Even though she told him to stop contacting her, Snyder continued to pursue Johns until August 2020 ,the lawsuit said.

Johns “told her USC counselor repeatedly about instances of a USC administrator (Snyder was Faculty Principal of Maxcy) propositioning her and/or pursuing her sexually,” the lawsuit said. “Every time she told the counselor and the counselor did not advise her on Title IX policies is a separate occurrence under the South Carolina Tort Claims Act.”

The lawsuit, like several others, accuses USC of failing to protect victims of sexual abuse and harassment on campus.

“USC allows this sexual harassment, grooming, and abuse to continue unabated and those responsible continue to go unpunished,” the lawsuit said.

Rock Hill Attorney **Randall Hood** is representing Johns in the lawsuit (*see below*).

According to his online bio, Snyder has been a professor at USC since 2008 and worked as the Faculty Principal of the Carolina International House at Maxcy College since 2014.

While USC reviews the allegations in the lawsuit, Snyder will not be allowed on campus and can't contact students without permission from his supervisor, the State reported.

## No accountability?

More than 10 women have recently accused USC of mishandling their sexual harassment complaints — and so far, no one has been held accountable for these claims.

Collectively, the allegations echo what USC alum [Allison Dunavant](#) told FITSNews months ago — USC's system is broken and only silences and re-victimizes the victims.

“From the very beginning, I was treated like I was the problem and the university made it very hard to even file a complaint,” Dunavant, one of three women who have sued USC after they were allegedly harassed by art professor **David Voros**, said. “The complaint process felt more like a system to run you into wall after wall until you get too tired and too frustrated and you give up.”

After the State newspaper's [investigative story](#) published detailed allegations of 10 women who all said the university failed to help them when they were harassed, [University of South Carolina](#) president **Bob Caslen** finally broke his silence on the issue.<sup>a</sup>

Caslen's announcement, which appears to be vaguely addressing allegations about Voros and other professors accused of sexual misconduct, included a 5-step plan for “improving” the process of sexual misconduct reporting.

Caslen's plan **did not mention firing** the alleged abusers and enablers — despite [students' consistent demands](#).



### **RELATED: Former Student Who Sued USC: System For Harassment Complaints 'Revictimizes The Victims'**

USC has taken two small actions to address the recent lawsuits and complaints.

Accused professors David Voros and Robert Richmond have been removed from their classroom duties. Both are still drawing a salary from the university.

While USC does protect tenured professors, it is not impossible to fire them. One of the reasons for firing a tenured professor at USC is “misconduct related directly and substantially to the fitness of the faculty member in the professional capacity as teacher or researcher.”

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“I think that if misconduct questions the ‘fitness’ of a professor, then he should be fired,” Dunavant previously [told FITSNews](#). “He is removed from his classroom duties, barred from doing independent studies, and not allowed to take students abroad. So in what ways is he ‘fit’?”

Yesterday, the [Coalition to Fire David Voros](#) wrote a scathing [letter](#) demanding that Caslen fire Voros, Richmond, and those who enabled them.

“President Caslen, real change is long overdue,” the students wrote. “UofSC cannot continue brushing these cases under the rug...The time to act is now.”

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