



TRICOCI UNIVERSITY
OF BEAUTY CULTURE.

Annual Security Report

October 2015

**Tricoci University of Beauty Culture, LLC
Annual Security Report – October 2015**

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ANNUAL SECURITY REPORT – OVERVIEW & DISSEMINATION

The health, safety and security of all of our constituents—particularly our students, associates (employees), and guests—is a priority for Tricoci University of Beauty Culture (“TUBC”). Accordingly, TUBC has developed a broad set of policies and procedures intended to protect, to the extent possible, all people spending time in our facilities.

These policies and procedures are developed (and periodically updated) by senior executives of the company. The policies and procedures are implemented and enforced by Campus Security Authorities (“CSA”), comprised of leadership teams at each TUBC location. At TUBC campuses, CSAs include senior executives visiting the campus (e.g., Chief Executive Officer, VP of Operations), the Campus Director (or equivalent), the Education Supervisor, the Enrollment Advisor (or equivalent), and the Student Success Advisor, as applicable.

This Annual Security Report (“ASR”) is required as a result of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”) and the U.S. Department of Education’s regulations for post-secondary schools, including TUBC. Tricoci University of Beauty Culture fully embraces the intention of the Clery Act and appreciates the support of the Department of Education (“ED”) in developing and administering our various safety and security programs.

TUBC’s ASR is a comprehensive document holding ALL key components of our safety and security programs, policies and procedures, as well as crime statistics related to the campus. For example, included within the ASR is TUBC’s Drug and Alcohol Abuse Prevention Program (DAAPP), as well as the process and results of our review of our DAAPP. The ASR is updated annually.

We believe that having one single document that holds all related content will streamline the distribution and communication of the information. In turn, this should improve the ultimate health, safety, and security of all constituent groups. Ultimately, that is the most important goal for TUBC.

Dissemination of Annual Security Report (and TUBC’s DAAPP)

On or before October 1 of each year, all students and associates are informed of the existence of the Annual Security Report and are provided information on how to easily access a copy of it via the Campus Director (or equivalent) or TUBC’s website (<http://www.tricociuniversity.com/annual-security-report>).

In addition, all students are made aware of TUBC’s Annual Security Report (and DAAPP) through the Student Catalog, which is reviewed with all students during the enrollment process. Further, TUBC’s Orientation Program for new students, which occurs before or during the first day of their academic program, includes a review of key elements of the Student Catalog, including our DAAPP, Campus Security Program, and how to obtain the Annual Security Report.

TUBC'S DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM

Tricoci University of Beauty Culture fully supports the Federal Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989. In compliance to these laws and the resulting regulations from the U.S. Department of Education, TUBC has developed a Drug and Alcohol Abuse Prevention Program (DAAPP).

TUBC's Drug and Alcohol Abuse Prevention Program (DAAPP) includes the following components:

- TUBC's policy and standards of conduct regarding drugs and alcohol;
- The implications of violating the policy or standards of conduct;
- An overview of the health risks associated with the use of illicit drugs and abuse of alcohol;
- Information regarding drug or alcohol programs (counseling, treatment and/or rehabilitation) available to students and associates; and
- The method TUBC uses to conduct its biennial review of the effectiveness of our DAAPP.

TUBC Policy & Standards of Conduct Regarding Drugs & Alcohol

Tricoci University of Beauty Culture is an alcohol-free and drug-free environment. Students and associates are prohibited from the unlawful manufacture, distribution, sale, dispensing, possession or use of a controlled substance or alcohol anywhere on Tricoci University of Beauty Culture property, including grounds, parking areas, anywhere within the buildings or while participating in school-related activities. Students and associates are also prohibited from being present on campus under the influence of alcohol or controlled substances. Note: students or associates taking prescribed or over-the-counter medication which may affect functioning should so inform a CSA.

Anyone who observes any violation of the above policy should immediately inform a CSA of such violation. The CSA will initiate the appropriate procedures.

Implications of Violating the Policy or Standards of Conduct

In addition to the potential health consequences of use or abuse of illicit drugs and alcohol, students and associates who violate the TUBC Policy & Standards of Conduct Regarding Drugs & Alcohol will be subject to a range of disciplinary and legal implications, including:

- Sanctions and penalties that may impact their status and/or ability to attend, or work for, TUBC;
- Sanctions and penalties that may be applied by local, state and federal authorities; and
- Sanctions and penalties regarding students' access to the Department of Education's Title IV program.

Sanctions & Penalties – Imposed by TUBC

Students or associates who violate the TUBC Policy & Standards of Conduct Regarding Drugs & Alcohol will be subject to disciplinary action up to and including termination of enrollment or employment, as appropriate. In all cases, TUBC will abide by local, state, and federal sanctions regarding unlawful possession of drugs and the consumption of alcohol, including the full enforcement of applicable underage drinking laws.

If there is a reasonable suspicion that a student or associate is under the influence of alcohol or a controlled substance while on TUBC's premises, they will be required to clock out for the day and leave the premises. The decision to dismiss a student or associate is solely at the discretion of the location's CSA and may not be supported by actual proof of controlled substance, illegal drugs or alcohol use.

Sanctions & Penalties – Imposed by Local, State or Federal Authorities

Depending on the specific violation and subsequent adjudication, a student or associate could face a significant punishment for violating the TUBC policy regarding drug and alcohol use. This may include financial penalties, as well as time in jail.

Given the constantly changing laws and sentencing guidelines regarding illegal drugs and alcohol, students or associates interested in understanding the potential punishments for these violations are encouraged to research the topic by entering the following search terms in Google:

- Illinois punishments: enter “punishments for drug and alcohol violations in Illinois”;
- Indiana punishments: enter “punishments for drug and alcohol violations in Indiana”; or
- Federal punishments: enter “punishments for federal drug and alcohol violations.”

Sanctions & Penalties – Students’ Access to Title IV Funding

Any students convicted of possessing or selling illegal drugs while receiving Title IV assistance will be ineligible for federal financial aid based on the chart below. If convicted of both possessing and selling illegal drugs and the periods of ineligibility are different, the longer penalty will apply. In addition, violations of federal, state, or local laws and ordinances concerning drugs and alcohol can lead to felony or misdemeanor convictions and legal sanctions, which include but are not limited to: fines, imprisonment, forfeiture of property, and loss of driving privileges.

	Minimum Ineligibility Period	Maximum Ineligibility Period
1st Offense	1 year from date of conviction	2 years from date of conviction
2nd Offense	2 years from date of conviction	Indefinite period
3+ Offenses	Indefinite period	Indefinite period

Overview of Health Risks with the Use & Abuse of Drugs and Alcohol

The use and abuse of alcohol and/or drugs can lead to physical and psychological health risks. These risks depend upon the type of alcohol/drug used and the intensity of the use. Long-term use of alcohol/drugs can lead to organic damage to the body and psychological problems. Even short-term use carries a risk of an overdose that can result in effects as serious as death. Alcohol/drug use also carries other direct and indirect health risks, including a heightened risk of blood-transmitted disease for users of intravenous drugs, the risk of pregnancy complications and birth defects in women who use alcohol/drugs while pregnant, and the impairment of the ability to operate motor vehicles.

While not comprehensive, some of the health risks associated with the use or abuse of specific substances are provided below:

- Alcohol: May provide a feeling of confidence and being in control. Those likely to be addicted may have an enzyme deficiency that allows them a high rate of consumption without drunkenness, encouraging a belief that since one doesn’t get obviously drunk, no harm is done. The tolerance is only on the surface. Liver, brain, heart, and stomach destruction goes on even without apparent symptoms. Over time, beer, wine, and hard alcohol often cause dependency and may be fatal.
- Marijuana: Use of marijuana may impair or reduce short-term memory and comprehension, alter sense of time, and reduce ability to perform tasks requiring concentration and coordination, such as driving a car. Research shows that knowledge retention may be lower when information is given while the person is “high.” Motivation and cognition are altered, making the acquisition of new information difficult. Marijuana can also produce paranoia and psychosis. The tar in marijuana smoke is a highly irritating carcinogenic. Long-term use may develop psychological dependence.
- Cocaine: Chronic use can cause ulceration of the mucous membrane in the nose. Cocaine can produce psychological dependency, a feeling that the user cannot function without the drug. Crack or free-base rock, a concentrated form of cocaine, is extremely potent. Its effects are felt within ten seconds of administration. Physical effects include dilated pupils, increased pulse rate, elevated blood pressure, and insomnia, loss of appetite, tactile hallucinations, paranoia, and seizures. Cocaine use may lead to death through disruption of the brain’s control of heart and respiration.
- Amphetamines & Other Stimulants: Stimulants can cause increased heart and respiratory rates, elevated

blood pressure, dilated pupils, and decreased appetite. In addition, users may perspire, experience headache, blurred vision, dizziness, sleeplessness, and anxiety. Extremely high doses can cause rapid or irregular heartbeat, tremors, loss of coordination, and even physical collapse. An amphetamine injection creates a sudden increased in blood pressure that can result in stroke, very high fever, or heart failure. In addition to the physical effects, users report feeling restless, anxious, and moody. Higher doses intensify the effects. Persons who use large amounts of amphetamines over a long period of time can develop an amphetamine psychosis that includes hallucination, delusions, and paranoia.

- Narcotics (e.g., heroin, methadone, morphine, prescription opiates): Tolerance to narcotics develops rapidly and dependence is likely. The use of unsterilized syringes may result in transmission of diseases such as AIDS, endocarditis, and hepatitis. Addiction in pregnant women can lead to premature, stillborn, or addicted infants. An overdose may produce slow and shallow breathing, clammy skin, convulsions, coma, and death.
- Depressants: The use of depressants can cause both physical and psychological dependence. Regular use over time may result in tolerance to the drug, leading the user to increase the quantity consumed. Very large doses can cause respiratory depression, coma, and death. The combination of depressants and alcohol can increase the effects of the drugs, thereby multiplying the risks. When regular users stop taking depressant drugs, they may develop withdrawal symptoms ranging from restlessness, insomnia, and anxiety to convulsions and death. Babies born to mothers who abuse depressants during pregnancy may be physically dependent on the drugs and show withdrawal symptoms shortly after they are born. Birth defects and behavioral problems have been associated with these children.
- Hallucinogens: Chronic users of PCP report persistent memory problems and speech difficulties. Mood disorders (depression, anxiety, and violent behavior) also occur. In later stages, chronic users often exhibit paranoid and violent behavior and experience hallucinations. Large doses of PCP may produce convulsions, coma, heart and lung failure, or ruptured blood vessels in the brain. Lysergic acid (LSD), mescaline, and psilocybin cause illusions and hallucinations. The physical effects may include dizziness, weakness, tremor, nausea, and drowsiness. Sensations and feelings may change rapidly. It is common to have a bad psychological reaction to LSD, mescaline, and psilocybin. The user may experience panic, confusion, suspicion, anxiety, and loss of control. Delayed effects, or flashbacks, can occur even after the use has ceased.
- Designer Drugs: Underground chemists modify the molecular structure of certain illegal drugs to produce analogs known as designer drugs. These drugs can be hundreds of times stronger than the drugs that they are designed to imitate. The narcotic analogs can cause symptoms such as those seen in Parkinson's disease; uncontrollable tremors, drooling, impaired speech, paralysis, and irreversible brain damage. Analogs of amphetamines and methamphetamines cause nausea, blurred vision, chills or perspiration, and faintness. Psychological effects include anxiety, depression, and paranoia. As little as one dose can cause brain damage. The analogs of phencyclidine cause illusions, hallucinations, and impaired perception.

Information Regarding Available Drug and Alcohol Programs

TUBC does not directly offer any professional counseling, treatment or rehabilitation programs for students or associates that have issues related to drugs and/or alcohol. However, TUBC understands and appreciates that professional assistance is typically required to successfully address these issues.

Any student who suspects that he or she, or someone else, may be at risk due to use or abuse of alcohol or illicit drugs is encouraged to seek services that can be of help. In most TUBC locations, there are numerous local organizations and resources available. Those in need of help can access these resources via the Internet, or can call the appropriate toll-free number provided below:

- Alcoholics Anonymous 1-800-356-9996
- American Council on Alcoholism 1-800-527-5344
- Cocaine Hotline 1-800-COCAINE
- National Council on Alcoholism 1-800-NCA-CALL
- National Institute on Drug Abuse 1-800-662-HELP
- National Suicide Prevention Hotline 1-800-273-8255

Method Used to Determine the Effectiveness of TUBC's DAAPP

On a biennial basis, during the August-September time-frame, TUBC performs a review of the effectiveness of our DAAPP. This review is led by TUBC's Executive team and outcome is submitted to the Vice President of Compliance and is approved by the Board if needed.

To determine if the DAAPP is meeting its objective, TUBC performs the following steps:

1. For each campus, determine how many violations of the TUBC Policy & Standards of Conduct Regarding Drugs & Alcohol occurred during the prior two years.
2. For each campus, determine how many students had been terminated due to violation of the TUBC Policy & Standards of Conduct Regarding Drugs & Alcohol.
3. For each campus, if there are two or less individuals who have violations during the period, and one or less individual who has been terminated due to a violation, then TUBC deems that there is not a drug and/or alcohol issue at the campus. If not, then the campus has a potential drug/alcohol issue at the campus.
4. Follow-up actions depend on the number of campuses with a potential drug/alcohol issue:
 - a. If 0 campuses have a potential drug/alcohol issue, then TUBC's DAAPP is deemed effective.
 - b. If 1 campus has a potential drug/alcohol issue, then TUBC's DAAPP is deemed effective, but the Campus Director (CD), or equivalent, will develop a report to explain the local conditions and determine if there are local changes required. See Step 5—CD Report Process below.
 - c. If 2 or more TUBC campuses have a potential drug/alcohol issue, then there may be a systemic issue with the effectiveness of TUBC's DAAPP. In this case, a non-conflicted TUBC executive (not directly overseeing the campuses involved) will be assigned to investigate and develop recommendations to the CEO. See Step 6—Executive Investigation Process below.
5. CD Report Process (if applicable)
 - a. The campus CD will review the violations to determine the root cause(s) of the violations and what actions, if any, can be taken locally to address these root cause(s).
 - b. The CD will provide a summary of recommendations, if any, to the Vice President of Operations.
 - c. The VP of Operations will review the summary and approve the appropriate recommendations, and provide guidance to the CD to help implementation of the approved recommendations.
6. Executive Investigation Process (if applicable)
 - a. Were any of the violations such that earlier management action, in hindsight, could have occurred;
 - b. If yes to 4.a, was it a management judgement issue (i.e., manager(s) looked the other way) or one where red flags could have been seen and triggered an earlier intervention;
 - c. Were any of the violations related to each other; if so, was the TUBC location/campus an environment that indirectly facilitated these violations due to operating procedures; and
 - d. Are there changes to TUBC's policies and standards of conduct that would likely reduce or eliminate the violations that occurred?
7. If the answer to 6.d is "yes," then the potential changes should be specified by the senior executive who conducted the analysis/investigation, in the form of a list of recommended changes to TUBC DAAPP.

TUBC senior executive team will review any recommended change(s) that result from the biennial review and, where practical/implementable, make the change(s) to the company's DAAPP prior to the next October 1 deadline for sharing the ASR with students and associates.

REVIEW OF EFFECTIVENESS OF TUBC'S DAAPP – MOST RECENT RESULTS

In the Fall of 2015, TUBC conducted a review of the effectiveness of our DAAPP, as outlined above.

The results of our review showed that the presence of drugs and alcohol (or their after-effects) at our campuses is isolated and the impact on our school environment is, if any, minimal. The summary results of the review are as follows (by step):

1. 2 of our 11 campuses had violations of our DAAPP policy/standard of conduct.
2. 2 of our 11 campuses had students who were terminated due to violation of our DAAPP policy/ standard of conduct.
3. Based on our method (see prior page), none of the campuses would be considered to have a potential drug/alcohol issue.
4. Based on our method (see prior page) and these results, **TUBC's DAAPP is deemed effective.**
5. N/A
6. N/A
7. N/A

These results and our conclusion were submitted to the Compliance Committee of TUBC's Board of Managers, and subsequently approved by the full Board at the April 21, 2014 Board meeting.

CAMPUS SECURITY INFORMATION, POLICIES AND PROCEDURES

TUBC seeks to ensure that students, associates and other visitors, as well as their belongings, are as safe as possible during their time on or near TUBC facilities. With this objective, and following the requirements as outlined in the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, TUBC has developed a set of policies and procedures that cover a range of safety and security matters, as outlined below.

General Security Information

From a campus & facility perspective, the following general security information applies:

- TUBC is not responsible for lost or stolen items.
- TUBC does not staff dedicated security or police personnel; each location has one or more CSAs, as outlined in ASR overview (page 2).
- All campuses are locked after hours and alarms are activated in Campuses equipped with security alarms.
- The majority of the campuses have security camera monitoring that is recorded 24/7.
- All campus rooms have the nearest exits posted by the door.
- Students are provided a locker to secure their property.
- Associates are provided a locker, a lockable office or a lockable desk to secure their property.

Crime Prevention Program

TUBC requests that students and associates follow the following general security guidelines, which we believe will help prevent crimes:

- Be responsible for your own security and the security of others.
- Report criminal actions or other emergencies occurring on campus to your CSA.
- Do not leave valuables visible in your car and always lock your car.
- Do not keep personal or valuable items in bags (backpacks, purses, kit bags) that will not be secure.
- Leave credit cards and personal banking information at home.
- Use your locker—do not leave personal property unattended in unsecured spaces.
- Keep your campus locker locked; and do not give anyone except Campus Management your locker combination.
- Be aware of others around you inside and around TUBC property; if you are uncomfortable with your surroundings, seek assistance and request an escort.
- Know where the exits are in case of an evacuation.
- When working late, keep all back and side doors locked.
- If you think a situation is dangerous, it most likely is; immediately seek assistance.

In addition to being informed of this program each year when given notice of this Annual Security Report, the program will also be reviewed with students and associates at their official orientation.

Harassment & Bullying Policy

TUBC is an environment that is free from intimidation or harassment. Harassment of associates and/or students by any associate, student, guest, or outside vendor is prohibited and may result in disciplinary action, up to and including termination from the program or company. Harassment is defined as behavior that is offensive to an individual or group, including unwelcome sexual advances, uninvited suggestive remarks, verbal, written or graphic communication that is sexist, racist, contains religious slurs, or ethnic jokes, etc. If you observe this type of behavior, you should immediately address the issue by advising the individual that it is unwelcome, unwanted and inappropriate. If the behavior does not cease, report it to a CSA or Campus Management immediately.

Verbal and/or written threats to any individual(s) will be taken seriously, perceived as credible and turned over to the local police for investigation. It is not the responsibility of Tricoci University of Beauty Culture to

evaluate the validity of a perceived threat. We view this as a serious matter and will not tolerate any threats, joking or not, regarding the safety of our associates and/or students.

"Bullying" often refers to verbal, physical, or other acts committed by a person to harass, intimidate, or cause harm to another person. The behaviors attributed to bullying may include verbal threats, menacing, harassment, intimidation, assaults, disruption of the school environment, associated disorderly conduct, and related behaviors. Should a student or associate feel that any of these situations apply, and could not be (or could not comfortably attempt to be) resolved directly, he/she is directed to immediately seek the help of a CSA. At the minimum, all cases of student bullying will be turned over to the Student Affairs department for investigation. Anyone witnessing threatening or bullying statements, verbal and/or written, made against any student, associate, should immediately inform a CSA.

Sexual Misconduct Prevention, Interpersonal Violence and Response Policy Introduction:

Tricoci University of Beauty Culture fully supports the objectives of the Federal Campus Sex Crimes Prevention Act and the Violence Against Women Act. These Acts require Tricoci University of Beauty Culture to follow compliance requirements and establish protections for victims of sexual discrimination, including: sexual harassment and/or assault (non-consensual sexual contact and non-consensual sexual intercourse), domestic or dating violence, sexual exploitation, intimidation, retaliation and stalking, each of which are described below in the definitions section of this policy. By policy, these and related actions are expressly prohibited by TUBC. As part of this policy, Tricoci University of Beauty Culture is committed to prevent such offenses from occurring and take appropriate steps to address any violations of sexual misconduct that occur within TUBC's jurisdiction. Tricoci University of Beauty Culture is committed to ensuring all students and employees feel safe in their learning and work environment so they have the opportunity to benefit fully from their Tricoci University of Beauty Culture experience.

Notice of Nondiscrimination:

Tricoci University of Beauty Culture strongly prohibits any discrimination on the basis of sex in its education programs per Title IX of the Education Amendments of 1972. Prohibited discrimination includes sexual harassment and all types of sexual misconduct and sexual violence, for which definitions of these terms are provided below. Any employee or student with any questions regarding this policy should see the Title IX Coordinator located at their specific Tricoci University of Beauty Culture location. A listing of all Title IX Coordinators serving each location and their contact information is listed below. Should any employee or student feel they have been the victim of sex discrimination of any kind they should see their Campus Title IX Coordinator as soon as possible.

Scope:

Tricoci University of Beauty Culture's Sexual Misconduct Policy's scope applies to all acts of sexual misconduct as well as all geographical areas within Tricoci University of Beauty Culture Campuses and their adjacent public properties, defined per Tricoci University of Beauty Culture location per the Clery Act. It covers all Tricoci University of Beauty Culture education programs and Tricoci University of Beauty Culture -sponsored activities, including field trips. Even if the violation did not occur within a Tricoci University of Beauty Culture Campus-related activity or elsewhere but the alleged perpetrator(s) also is a member of the Tricoci University of Beauty Culture community, Tricoci University of Beauty Culture will process all violations and complaints in order to pay consideration to whether the incident has created a hostile educational environment within each Tricoci University of Beauty Culture location. This policy applies to all Tricoci University of Beauty Culture employees and students in all Tricoci University of Beauty Culture program offerings, regardless of each individual's sexual orientation or gender identity. This policy also pertains to third parties who witness or are informed of an alleged sexual misconduct violation. Instances of sexual misconduct are included in the school's reporting of information required under the Clery Act.

Definitions:

Sexual harassment is defined as unwelcome advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when submission to or rejection of this conduct explicitly or implicitly affects a person's employment or education, unreasonably interferes with a person's work or educational performance, or creates an intimidating, hostile or offensive working or learning environment.

Consent is defined as words or voluntary agreement to engage in sexual activity.

- Consent cannot be given by someone who is incapacitated in any way.

- Past consent does not imply future consent.
- Absence of resistance or silence does not imply consent.
- Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another person.
- Consent can be withdrawn at any time for any reason.
- Coercion, force or threat of by either party invalidates consent.

Incapacitation is defined as the physical and/or mental inability to make informed, rational judgments. When alcohol is involved, incapacitation is determined by how the alcohol consumed impacts a person, including the person's decision making capacity, awareness of consequences and ability to make informed judgments. Incapacitation may also be observed when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the person from having the capacity to give consent.

Sexual assault is defined as an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation including rape, fondling, incest, or statutory rape. In this and similar contexts, consent is defined as a voluntary, positive agreement between the participants to engage in specific sexual activity. Lack of verbal or physical resistance or submission by the victim resulting from the use of force or threat of force by the accused shall not constitute consent.

- Non-Consensual Sexual Contact: Any intentional touching of the intimate parts of another person, causing another to touch one's intimate parts, removing clothing or exposure of another without consent. Sexual contact also includes attempted sexual intercourse
- Non-Consensual Sexual Intercourse: Any act of sexual intercourse with another individual without consent. Sexual intercourse includes vaginal or anal penetration, however slight, with any body part or object, or oral penetration involving mouth-to-genital contact.

Domestic Violence is defined as a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is living with or has lived with the victim as a spouse or partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which this policy applies, or by any other person against an adult or youth victim who is protected under the domestic or family violence laws of the jurisdiction in which this policy applies. Domestic violence can be physical, sexual, emotional, economic, or psychological actions or threats of actions that influence another person. This includes any behaviors that intimidate, manipulate, humiliate, isolate, frighten, terrorize, coerce, threaten, blame, hurt, injure, or wound someone.

Dating Violence is defined as violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and when the existence of such a relationship shall be determined based on the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

Sexual Exploitation is defined as one person taking sexual advantage of another person for the benefit of any other than that person without that person's consent. Examples include:

- Prostituting another person;
- Recording images (video, photograph) or audio of another person's sexual activity, intimate body parts, nakedness without that person's consent;
- Distributing images (video, photograph) or audio of another person's sexual activity, intimate body parts or nakedness, if the individual distributing the images or audio knows or should have known the person depicted did not consent to the disclosure of such activity;
- Viewing another person's sexual activity, intimate body parts or nakedness in a place where that person would have reasonable expectation of privacy, without that person's consent and for the purpose of arousing sexual desire.

Stalking is defined as a pattern of repeated and unwanted attention, harassment, contact, or any other course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or to suffer substantial emotional distress.

Retaliation is defined as intimidating, threatening, coercing, or in any way discriminating against an individual because of the individual's informal or formal complaint or participation in a school or the U.S. Department of

Education, Office for Civil Rights (OCR) investigation or proceedings related to sexual violence or other civil rights concerns. Federal civil rights laws, including Title IX, make it unlawful to retaliate against an individual for the purpose of interfering with any right or privilege secured by these laws.

Title IX Coordinator:

Each Tricoci University of Beauty Culture has a Title IX Coordinator designated to comply with and carry out the responsibilities of Tricoci University of Beauty Culture under Title IX of the Education Amendments of 1972, which prohibits sex discrimination in the education programs and activities. Any inquiries regarding Title IX should be addressed with the Title IX Coordinator (Names and contact information for Title IX Coordinator at each Tricoci University of Beauty Culture location is listed below). If an alleged case of sexual misconduct is brought to the attention of a Title IX Coordinator via a victim, third party or responsible employee, the Title IX Coordinator will take immediate and effective measures to address and investigate the alleged incident of sexual misconduct. The Title IX Coordinator will assist in preventing a potential hostile environment, which interferes with students' ability to benefit from the education offered at Tricoci University of Beauty Culture. Whether a harassed student or employee, parent of a student or a third party files a complaint under the Tricoci University of Beauty Culture's grievance procedures or requests action on the student or employee's behalf, the Title IX Coordinator that knows, or reasonably should know about a possible instance of sexual misconduct must immediately investigate what occurred and then take appropriate steps to resolve the issue.

The Title IX Coordinator is responsible for overseeing Tricoci University of Beauty Culture's response to Title IX reporting and complaints. The Title IX Coordinator will also address any patterns or systemic problems which are revealed through complaints or reports on incidents. The Title IX Coordinator is responsible for initiating, coordinating and documenting actions taken during Title IX investigations against the perpetrator and support for the victim.

The remainder of the Sexual Misconduct policy will refer to the Title IX Coordinator and his/her responsibilities to support the employees and students of Tricoci University.

Title IX Coordinator Names and Contact Information for each Tricoci University of Beauty Culture Campus:

Tricoci University of Beauty Culture Campus Name and Address	Title IX Coordinator Name	Title IX Coordinator Phone Number	Title IX Coordinator Email Address
<u>Bridgeview</u> 7350 W 87 th Street Bridgeview, IL 60455	Emilie Boyce	708-233-9933	eboyce@tubc.edu
<u>Chicago Northeast</u> 6458 N Sheridan Ave Chicago, IL 60626	Amy Collazo	773-764-6458	acollazo@tubc.edu
<u>Chicago Northwest</u> 5321 N Harlem Ave Chicago, IL 60656	Kristin Bloniarczyk	773-467-1900	kbloniarczyk@tubc.edu
<u>Elgin</u> 264 S Randall Road Elgin, IL 60123	Chelsea Geishert	847-376-0740	cgeishert@tubc.edu
<u>Glendale Heights</u> 530 E North Ave Glendale Heights, IL 60139	Diana Cangialosi	630-790-1500	dcangialosi@tubc.edu
<u>Highland</u> 2549 Highway Ave Highland, IN 46322	Samantha Haseman	219-838-2004	shaseman@tubc.edu
<u>Indianapolis Northeast</u> 9725 Crosspoint Commons Indianapolis, IN 46256	Megan Weir	317-841-9400	mweir@tubc.edu
<u>Lafayette</u> 833 Ferry Street Lafayette, IN 47901	Ashley Fluck	765-742-0068	afluck@tubc.edu

<u>Libertyville</u> 751 E Park Ave Libertyville, IL 60048	Jen Bubloni	847-247-8100	jbubloni@tubc.edu
<u>Peoria</u> 602 W Glen Ave Peoria, IL 61614	Julie Moore	309-679-4500	jmoore@tubc.edu
<u>Rockford</u> 5485 E State St Rockford, IL 61108	Brian Polky	815-226-9848	bpolky@tubc.edu
<u>Oakbrook Campus Resource Center</u> 2000 Spring Road, Suite 202 Oakbrook, IL 60523	Stacie Hendrickson	331-454-0042	shendrickson@tubc.edu

Confidentiality:

Tricoci University of Beauty Culture urges victims to seek help and support if they are a victim of sexual misconduct in anyway. Although Tricoci University of Beauty Culture does not offer professional or pastoral counseling services it will offer support as needed to refer a victim to an appropriate source of help. Tricoci University of Beauty Culture will always follow applicable state and federal laws in respect to the support the Campus offers the victim.

Tricoci University of Beauty Culture’s confidentiality policy pertains to maintaining and properly addressing each individual report of sexual misconduct. Refer to Tricoci University of Beauty Culture’s Confidentiality Policy for a complete description. Tricoci University of Beauty Culture encourages any employee or student to talk to someone about what happened in order to obtain appropriate support. A victim may report the offense to a “responsible employee” who, at the Tricoci University of Beauty Culture Campus level could be an educator or a Campus Security Authority, (an employee in a leadership position) who at the Tricoci University of Beauty Culture Campus level may include the Campus Director (or equivalent), the Education Supervisor, the Enrollment Advisor (or equivalent), and the Student Success Advisor, as applicable. Before a victim shares any information with a responsible employee, the victim should be made aware the responsible employee has an obligation to report the incident to the Title IX Coordinator.

If the victim would like to remain confidential or requests the incident not be investigated the victim shall be of the understanding that the Tricoci University of Beauty Culture Campus must evaluate if the incident compromises its ability to provide a safe, non-discriminatory environment for all employees and students which includes the victim of the incident. Should a student seek out the support of a responsible employee, the responsible employee is obligated to report to the Title IX Coordinator all important details about the alleged incident shared by the victim and the Title IX Coordinator will gather all facts in order to take immediate and appropriate steps to investigate what happened and support a fair and prompt resolution.

Please note, if Tricoci University of Beauty Culture determines that an alleged perpetrator(s) poses an immediate threat to the Tricoci University of Beauty Culture Campus environment, the Title IX Coordinator and/or CSA may be required to issue a notice of timely warning to the Campus employees and students. Tricoci University of Beauty Culture will not include any information that identifies the victim of the incident in its warning.

Tricoci University of Beauty Culture will obtain consent and inform the victim (or the victim’s parents or legal guardians if the victim is under 18) prior to beginning an investigation of sexual misconduct of any kind. If the victim requests confidentiality or requests the investigation not be pursued, Tricoci University of Beauty Culture will take all reasonable steps to maintain the confidentiality request or request to not pursue the investigation. If a victim requests that his or her name or any other personally identifiable information not be disclosed to the alleged perpetrator, Tricoci University of Beauty Culture will inform the victim that its ability to respond to the instance of reported sexual misconduct may be limited. Even if the University can’t take disciplinary action against the alleged perpetrator because the victim insists on confidentiality, it will pursue other steps in order to limit effects of the alleged incident of sexual misconduct and prevent any reoccurrence. If Tricoci University of Beauty Culture cannot ensure confidentiality, Tricoci University will inform the victim. Tricoci University of Beauty Culture prohibits retaliation in all instances of reported sexual misconduct, and Tricoci University of Beauty Culture will take steps to prevent retaliation as well as strong responsive action if any form of retaliation occurs.

Options for Assistance:

If any individual (student or employee) is a victim of any type of sexual misconduct, his or her first priority should be to locate a place of safety and obtain any necessary medical treatment. Tricoci University of Beauty Culture strongly advocates that a victim of these offenses report the incident and seek immediate assistance. Time is a critical factor for evidence collection and preservation for the proof of a criminal offense. An assault should be reported directly to local authorities at the non-emergency number, listed below. In an emergency, dial 911. The Title IX Coordinator should also be notified (even if made aware by Tricoci University of Beauty Culture Campus responsible employee). Upon request, the Title IX Coordinator will assist victims in reporting incidents of these offenses to local police, and will work to protect the confidentiality of the victims(s), as desired. Filing a police report will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers.

List of Police Non-Emergency Phone Numbers, by Tricoci University of Beauty Culture location:

Bridgeview, Illinois: 708-458-2131

Chicago Northeast, Illinois: 311

Chicago Northwest, Illinois: 311

Elgin, Illinois: 847-289-2700

Glendale Heights, Illinois: 630-260-6070

Highland, Indiana: 219-838-3184

Indianapolis, Indiana: 317-327-3811

Lafayette, Indiana: 765-807-1200

Libertyville, Illinois: 847-362-8310

Peoria, Illinois: 309-673-4521

Rockford, Illinois: 815-966-2900

See below for a link for professional resources in the area of the zip code that is entered, as well as a list of professional agencies.

Link to enter zip code in order to obtain local resources: <https://www.notalone.gov/resources/>

If desired for student or employee victims of the above offenses, Tricoci University of Beauty Culture will assist victims in changing their academic, living, transportation and/or working situations, regardless of whether the victim chooses to report the crime to local law enforcement, if such changes are reasonably available. Tricoci University of Beauty Culture does not offer professional or pastoral counseling, but the Title IX Coordinator at each Tricoci University of Beauty Culture location will provide immediate contact information for local assistance resources and other support to facilitate victim safety and wellness and strongly encourages any victim to utilize the many resources that are available, including:

- National Sexual Assault Hotline: 1-800-656-HELP
- Rape, Abuse, Incest National Network: <http://www.rainn.org/>
- National Domestic Violence Hotline: 1-800-799-7233
- Not Alone.gov: <https://www.notalone.gov/resources/>

Per the Student Right to Know Act, schools must notify their students as to where they may obtain information regarding registered sex offenders in their area. Accordingly, students (and associates) are encouraged to utilize the following links that lead to private, federal and state resources on the topic:

- Megan's Law: <https://www.meganslaw.com>
- U.S. Department of Justice: <http://www.nsopw.gov/Core/Portal.aspx>
- National Sex Offender Info: <http://www.fbi.gov/hq/cid/cac/registry.htm>

Tricoci University of Beauty Culture believes the best method to address the above offenses is to prevent them from happening in the first place. Prevention requires all individuals to be educated, aware and diligent. To assist in this prevention effort, Tricoci University of Beauty Culture does the following:

- Educate new students (during new student orientation) and associates (during new associate orientation) about these offenses, including what they are and what to do if they have been victimized or have seen

or heard about someone else being victimized.

- Provide ongoing awareness of these offenses to existing students and associates via an annual distribution of the Annual Security Report, with an emphasis on the topic of the offenses and related programs outlined herein.

As with other forms of harassment, individuals who believe they are victims of sexual harassment should make it clear to the source(s) of the harassment that such behavior is offensive to them. If the behavior continues, document the matter and refer it to a responsible employee, which includes CSAs.

Protocol to Report a Grievance:

Should an employee, student, third party or parent/guardian (if the student is under 18 years of age) need to report a violation of sexual misconduct, he/she should file the grievance with the Title IX Coordinator at the Tricoci University of Beauty Culture location where the employee works or the student attends. Typically the report is initiated by the victim who feels their rights under this policy have been violated. The grievance can also be filed with a responsible employee as described above, and the responsible employee will relay to the Title IX Coordinator. Tricoci University of Beauty Culture will accept anonymous reports of violations, and the individual reporting the incident is encouraged to provide as much detail as possible to allow Tricoci University of Beauty Culture to investigate the situation and respond appropriately. In cases of anonymous reporting, Tricoci University of Beauty Culture may be limited in its ability to investigate the violation unless sufficient information is provided to enable the University to conduct a complete and fair investigation or take the appropriate actions. The Title IX Coordinator may ask the victim to confirm their report in writing and sign a complaint form. Complaint forms are available from the Title IX Coordinator or Campus Director. Once a grievance is reported, the Title IX Coordinator will request consent to proceed with investigation of the grievance from the victim. Should the victim request the grievance remain confidential or not to be investigated, the Title IX Coordinator will need to evaluate the grievance and determine if the request can be honored.

Investigation Procedures:

Tricoci University of Beauty Culture -imposed sanctions are additional to any legal actions taken by local, state or federal authorities. Individuals who are found to be participating in any of the offenses outlined above will be subject to an institutional disciplinary proceeding action, including but not limited to suspension or termination. To adjudicate these cases, Tricoci University of Beauty Culture will engage members of the TUBC Executive Team (the "Disciplinary Committee") to lead the disciplinary action proceeding, which will provide a prompt, fair and impartial investigation and resolution. The Disciplinary Committee will be knowledgeable on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. In addition, the Disciplinary Committee will be "current" in topics of domestic/dating violence, sexual assault and stalking, having participated in annual training on these topics.

Once the Disciplinary Committee is in receipt of the grievance, a member of the committee will respond within 2 business days. Within 10 additional business days, the Disciplinary Committee will conduct the investigation and provide actions and /or resolutions taken. Throughout this process, both the victim and the alleged perpetrator, as applicable, will be entitled to the same opportunities to have others, including an advisor, present during the proceeding. Further, both the victim and the alleged perpetrator must be simultaneously informed, in writing, of the outcome of such a proceeding, Tricoci University of Beauty Culture's procedures for the alleged perpetrator and the victim to appeal the results of the proceeding, any change to the results that occurs prior to the time that such results become final, and when such results become final.

Guidance for the creation of Tricoci University of Beauty Culture's Sexual Misconduct Policy, Confidentiality Policy and Title IX Coordinator Responsibilities was taken from the following sources:

- NotAlone.gov: Together Against Sexual Assault (United States Federal Government Site for Sexual Abuse Prevention)
- Dear Colleague Letter dated April 11, 2011 from the United States Department of Education Office for Civil Rights

Any questions about this policy should be addressed to the Title IX Coordinator at the applicable Tricoci University of Beauty Culture location.

Weapons Policy

Other than in the possession of official on-duty officer of the law, prohibited and/or dangerous weapons are not

permitted on any TUBC facility or TUBC-organized offsite events. A permit to carry a firearm or concealed weapon does not supersede this policy. Students or associates in possession of a weapon will be immediately terminated and the police contacted. Some examples of prohibited weapons include:

- Firearms (pistols, revolvers, shotguns, rifles and bb guns)
- Knives (switchblades, gravity knives, etc.)
- Metal knuckles
- Bows and arrows
- Tasers

Monitoring/Recording Criminal Activity at Off-Campus Locations

There are no off-campus locations of student organizations officially recognized by TUBC. Thus, we do not have a policy to monitor and record through local police agencies any criminal activity at any specific off-campus locations on an ongoing basis.

Reporting Crimes or Other Emergencies

If you observe any crime or if any person reveals to you that he/she learned of, was the victim of, perpetrator of, or witness of a crime, immediately inform the CSA. This crime may take the form of hate crimes, which manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, national origin, sexual orientation, gender identity, ethnicity or disability. To protect individuals and encourage all crimes to be reported (and included in the annual disclosure of crime statistics), TUBC will allow victims or witnesses to report crimes on a voluntary, confidential basis. TUBC will initiate procedures of contacting the appropriate authorities and documenting the incident.

Timely Warning and Emergency Notification for Serious Crimes and/or Threats

In the event that a situation arises that constitutes an ongoing or continuing threat to the health or safety of students and/or associates, TUBC will immediately notify the campus community. Since each TUBC location is contained within a small area (typically a building and exterior parking), the existence of this threat will be confirmed by a CSA at the specific location. TUBC will, without delay, determine the content of the notification, and initiate the notification process. The notification will be issued by the CSA via one or more of the following methods: text or e-mail announcements, the posting of flyers, campus announcements, or other appropriate means. The broader community will be made aware in a timely manner of any crimes, suspicious activities or other security problems through local police reports, which are published in the local newspaper.

Security Notifications and Updates

In the event TUBC is made aware of a potential security situation that is not of immediate emergency nature, but may affect the potential safety and security of TUBC guests, students and associates, TUBC will distribute written notification documenting the security concern. Updates will be distributed in the same manner, or other method, as needed.

Emergency Response and Evacuation Procedures

In an emergency requiring building evacuation, students, associates and guests should evacuate through the nearest exit, taking only personal valuables that are in the immediate area. All emergency exit maps are posted throughout the campus. Do not return to offices and lockers. When the alarm sounds or when instructed via announcement from a campus official, please remain calm and keep to the right of walkways when exiting the building. This allows emergency personnel to have unobstructed access throughout the building. After exiting the building, please gather at the remote end of the parking lot or the campus designated evacuation area and remain there until an all clear sign has been given by a campus official.

TUBC campuses will conduct two tests of these procedures each year; the first will be performed during March and the second will be performed in September.

Severe Weather Shelter

In the event a severe weather warning has been issued or another situation arises that may impact the health or safety of people on campus, an announcement and directives will be made via the campus intercom. All associates and students need to remain calm and should follow the verbal instructions, seeking shelter in interior, non-windowed areas of the school.

Medical Emergency

In the event of a medical emergency requiring immediate action, persons should engage a campus associate to dial 911 for outside medical assistance. If an associate is not in the immediate area and the situation appears dire, the student should initiate the 911 call immediately.

CAMPUS CRIME STATISTICS

Each year, as required by the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, TUBC ensures that three years of crime data have been entered into the Department of Education's online Campus Safety and Security Survey application.

Crimes that must be included in the data sets are:

- Criminal Offenses—Criminal Homicide, including: a) Murder and Non-negligent Manslaughter, and b) Negligent Manslaughter; Sex Offenses, including: a) Forcible, and b) Non-forcible; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson.
- Hate Crimes—Any of the above-mentioned offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property, that were motivated by bias; and
- Arrests and Referrals for Disciplinary Action for Weapons: Carrying, Possessing, Etc.; Drug Abuse Violations and Liquor Law Violations.
- Domestic violence, dating violence, and stalking incidents that were reported to CSA's or local police agencies.

Geographic areas associated with The Clery Act are:

- On-Campus – any building or property owned or controlled (leased) by an institution within the same reasonably adjoining geographic area and used by the institution in direct support of, or in a manner related to the institution's educational purposes. These buildings include residential halls, any building or property that is owned by the institution but controlled by another person, those frequently used by students and those that support institutional purposes such as a food or retail vendor. Any on-campus buildings would be the school itself.
- Non-Campus – includes any building (or property) owned or controlled by student organizations recognized by the school, as well as any building or property owned or controlled by the school that is not considered on-campus (above). Note: TUBC does not have any non-campus buildings.
- Public Property – all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

Anyone who is interested in obtaining crime statistics for any individual TUBC campuses, or groups of campuses, can do so using ED's Campus Safety and Security Data Analysis Cutting Tool application, which can be found through the following link: <http://ope.ed.gov/security/GetOneInstitutionData.aspx>.

The "output" (crime statistics, etc.) from the application noted directly above for all TUBC campuses is on the following page.