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6 Attorneys for Plaintiff
7 JOHN DOE

Per local Rule, This case is assigned to
Judge Devine, John P, for all purposes.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF CONTRA COSTA**

10
11 JOHN DOE,

12 Plaintiff,

13 vs.

14 ETHAN BUCKLEY, and DOES 1
15 through 50, inclusive,

16 Defendants.

17
18 **SUMMONS ISSUED**
19

Case No.: C25-01776

COMPLAINT FOR:

- (1) **DEFAMATION;**
- (2) **PUBLIC DISCLOSURE OF PRIVATE FACTS;**
- (3) **FALSE LIGHT;**
- (4) **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS;**
- (5) **HARASSMENT;**
- (6) **TORTIOUS INTERFERENCE; AND**
- (7) **DOXING (ACTION BASED ON CIVIL CODE SECTION 1708.89)**

20
21 Plaintiff JOHN DOE (hereinafter "Plaintiff") alleges:

22 **I. PARTIES**

23 1. Plaintiff is an individual who permanently resides in the County of Contra Costa, State
24 of California. Plaintiff brings this action under a pseudonym pursuant to Civil Code section
25 1708.89(e), which expressly permits plaintiffs to proceed under a pseudonym in actions alleging
26 violations of Civil Code section 1708.89.

27 ///

2. Plaintiff's use of a pseudonym is necessary to protect Plaintiff's privacy and safety, given that the underlying conduct involves the publication of Plaintiff's personal identifying information with the intent to incite harassment or violence. Disclosure of Plaintiff's identity would defeat the purpose of the protections afforded by Civil Code section 1708.89.

3. Plaintiff is informed and believes that Defendant ETHAN BUCKLEY (hereinafter “Defendant”) is, and at all relevant times herein was, an individual who resides in the city of Walnut Creek in Contra Costa County, California.

4. The true names of Defendants named as DOES 1–50, inclusive, are unknown to Plaintiff at this time, and therefore Plaintiff sues these Defendants under such fictitious names. Plaintiff will amend this Complaint to show their true names and capacities when the same have been ascertained. Plaintiff is informed and believes, and thereon alleges, that each of the fictitiously named Defendants is responsible in some manner for the occurrences herein alleged, and that Plaintiff's injuries were proximately caused by those Defendants.

II. JURISDICTION AND VENUE

5. This Court has personal jurisdiction over Defendant because Defendant is an individual who resides in the City of Walnut Creek, County of Contra Costa, State of California. Defendant has committed tortious acts within the State of California directed toward Plaintiff, a resident of California. These acts caused injury to Plaintiff in this state and arise from Defendant's purposeful availment of the privileges and protections of California law.

6. This Court has subject matter jurisdiction over this action pursuant to Article VI, Section 10 of the California Constitution and California Code of Civil Procedure § 410.10, as the Superior Court of California has original jurisdiction in all civil matters.

7. Venue is proper in this Court pursuant to California Code of Civil Procedure § 395(a) because Defendant resides in Contra Costa County, and the wrongful acts alleged herein were committed, in whole or in part, in this county.

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III. GENERAL ALLEGATIONS

8. Plaintiff and Defendant were close friends in high school and the beginning of college, but had a fallout in July of 2023.

9. During their friendship, they frequently exchanged video and text messages through the Snapchat mobile application (hereinafter "Snapchat"). Snapchat is a mobile messaging app where users send and receive photos and videos called "snaps" that typically disappear after being viewed once.

10. In December of 2021, during Plaintiff's freshman year of college (hereinafter the "University"), Defendant sent him a Snapchat video while Defendant was partying with some friends at the University of Portland.

11. Plaintiff sent a Snapchat video reply that referred to Defendant and his friends as his "niggers" (the "Snapchat Video"). Defendant had used this same racial slur in his initial Snapchat video to Plaintiff and Plaintiff's reply mirrored the energy and language of the Defendant's message.

12. On information and belief, both parties exchanged these Snapchat videos while they were intoxicated and their judgment was impaired. Notwithstanding, the communications were private and intended to be jokes between close friends.

13. Plaintiff never intended anyone other than Defendant to see the Snapchat Video and reasonably expected the private communication to disappear after it was read by Defendant.

14. During the summer of 2023, the friendship between Plaintiff and Defendant deteriorated and they had a falling out in July of 2023.

15. On or about July 17, 2023, Plaintiff received a notification from Snapchat that Defendant had had saved two (2) items from Snapchat to his cell phone camera roll. At the time, Plaintiff did not know what items Defendant had downloaded.

16. On or about July 18, 2023, Defendant sent Plaintiff a threatening text via Snapchat which accused Plaintiff of turning their mutual friends against him. After Plaintiff denied the accusations, Defendant retaliated by sending another text message which attached a copy of the

1 Snapchat Video from December of 2021. Plaintiff interpreted this communication from Defendant
2 as blackmail and he became concerned that Defendant would distribute the private Snapchat Video
3 to others.

4 17. On or about August 11, 2023, Defendant reached out to Plaintiff to try to reconcile
5 their friendship. Plaintiff confronted Defendant about the blackmail threat and expressed his
6 concerns that Defendant would use the private Snapchat Video against him. Defendant alleged that
7 he would never publish the Snapchat Video.

8 18. On or about August 27, 2024, Defendant forwarded the Snapchat Video to the Dean
9 of Students, the Executive Vice President/Chief Advancement Officer, and the Senior Vice
10 President of University Advancement at the University where Plaintiff attended college. A true
11 and correct copy of the August 27, 2024 email that Defendant sent to Chapman University is
12 attached hereto and incorporated herein by reference as “**Exhibit A**”.

13 19. Defendant’s August 27, 2024 email alleged that Plaintiff could be seen in the Snapchat
14 Video wearing a University shirt, using a racial slur, and allegedly being under the influence of
15 illegal substances. Defendant complained that Plaintiff’s conduct was “unacceptable” for
16 University students, believed it violates the Student Conduct policies, and urged the University to
17 discipline Plaintiff, even suggesting he should not be allowed to remain enrolled due to a pattern
18 of similar behavior. (*See* Exh. A.)

19 20. Having to watch the Snapchat Video and explain his regrettable behavior to a
20 University faculty member was humiliating and devastating for Plaintiff.

21 21. On or about August 29, 2024, Plaintiff reached out to Defendant’s mother to inform
22 her of the email that Defendant had sent to the University. Since Plaintiff and Defendant had not
23 spoken to each other in over a year, Plaintiff hoped that she would be able to facilitate a resolution.

24 22. On or about September 6, 2024, Defendant’s mother confirmed that she had discussed
25 the incident with Defendant and that Defendant promised her that he had deleted the Snapchat
26 Video.

27 ///

23. In February 2025, the University received two anonymous complaints regarding the same Snapchat Video and falsely accusing Plaintiff of regularly using racial slurs on campus and social media. True and correct copies of the online complaints to the University dated February 25, 2025 and February 27, 2025 are attached hereto and incorporated herein by reference as “**Exhibit B**”.

24. On March 11, 2025, Defendant admitted to sending the video to the University through signed apology letters. A true and correct copy of the March 11, 2025 letter is attached hereto and incorporated herein by reference as “**Exhibit C.**”

25. In mid to late March of 2025, Plaintiff learned that one of his friends received a copy of the Snapchat Video. The Snapchat Video had been forwarded to her by a third party that Plaintiff does not know (the “Third Party”).

26. Based on discussions with the Third Party, Plaintiff is informed and believes and on that basis herein alleges, that the Snapchat Video was distributed anonymously from a burner account on Instagram to an African American student at Chapman University, who then forwarded it the Third Party.

27. Plaintiff is informed and believes and on that basis herein alleges that the Snapchat Video was sent to multiple students at the University, but Plaintiff does not know the identities or the total number of people who received a copy of the Snapchat Video.

IV. CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION
DEFAMATION (LIBEL)
 (Against Defendant Ethan Buckley)

28. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 27 as if fully set forth herein.

29. Defendant forwarded the Snapchat Video via email to the University where Plaintiff attends college, and falsely accused Plaintiff of regularly using racial slurs and posting racist content on social media.

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1 30. Plaintiff is informed and believes and on that basis herein alleges that Defendant also
2 disseminated the Snapchat Video anonymously to others by way of electronic communications
3 including but not limited to email, text message, and/or direct messaging on social media.

4 31. Defendant's written statements and publications were defamatory as they had a natural
5 tendency to expose Plaintiff to hatred, contempt, ridicule, and/or disgrace and would cause a
6 person to be shunned or avoided.

7 32. The widespread dissemination of the Snapchat Video and the false accusations of
8 racism caused a threat to Plaintiff's academic standing, and negatively impacted Plaintiff's
9 reputation, relationships, and standing within the community.

10 33. The written statements and publications made by Defendant were unprivileged.

11 34. Defendant's statements were not made in any context that would provide legal
12 privilege.

13 35. Defendant published and distributed the Snapchat Video and written accusations
14 intentionally and with malice.

15 36. Defendant knew or should have known that the accusations were false when made and
16 would subject Plaintiff to hatred, contempt, ridicule, and/or disgrace.

17 37. Alternatively, Defendant was at least negligent in publishing and distributing the
18 Snapchat Video and written accusations.

19 **SECOND CAUSE OF ACTION**
20 **PUBLIC DISCLOSURE OF PRIVATE FACTS**
21 **(Against Defendant Ethan Buckley)**

22 38. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 37
23 as if fully set forth herein.

24 39. Defendant has publicly disclosed the private Snapchat Video by a targeted email to
25 the University where Plaintiff attends, and on information and belief, has disseminated the
26 Snapchat Video to others by way of electronic communications including but not limited to email,
27 text message, and/or direct messaging on social media.

1 40. The Snapchat Video, was, and always intended to be, a private communication
2 between Plaintiff and Defendant.

3 41. The Snapchat Video distributed by Defendant was not available to the general public
4 and was disclosed without Plaintiff's consent.

5 42. The private communication between Plaintiff and Defendant was not a matter of public
6 interest or concern.

7 43. Plaintiff reasonably believed that the Snapchat Video would be deleted shortly after it
8 was read by Defendant and therefore it would not be published or distributed to anyone other than
9 Defendant.

10 44. The Defendant's actions in saving, distributing, and falsely representing the content of
11 the Snapchat Video constitute a serious invasion of privacy.

12 45. The distribution and disclosure of Plaintiff's private communication without his
13 consent is patently offensive conduct that would be objectionable to a reasonable person.

14 46. The unauthorized distribution of the Snapchat Video, particularly after the Defendant
15 claimed to have deleted it, demonstrates a deliberate breach of the Plaintiff's privacy rights.

16 47. As a direct and proximate result of Defendant's conduct, Plaintiff suffered and
17 continues to suffer damage to his reputation and severe emotional distress.

18 48. As a direct and proximate result of the conduct of Defendant, Plaintiff suffered and
19 continues to suffer economic loss including, but not limited to attorneys' fees and out of pocket
20 expenses, all in amount according to proof at the time of trial.

21 49. The above-described acts of Defendants have caused and are continuing to cause
22 irreparable injury to Plaintiff, for which Plaintiff has no adequate remedy at law, and Defendants
23 will continue to do so unless enjoined by this Court.

24 **THIRD CAUSE OF ACTION**

25 **FALSE LIGHT**

26 (Against Defendant Ethan Buckley and DOES 1 to 50)

27 50. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 49
28 as if fully set forth herein.

1 51. Each Defendant's dissemination and publication of the Snapchat Video portrayed
2 Plaintiff in a false light and out of context, was harmful, highly offensive and caused severe injury
3 to Plaintiff and to Plaintiff's reputation and image.

4 52. Defendant Ethan Buckley's (individually "Defendant Buckley") conduct also
5 threatened, and continues to threaten, Plaintiff's academic standing at the University.

6 53. Prior to the use, distribution and dissemination of the false portrayal of Plaintiff,
7 Defendant Buckley knew (and was advised) that such portrayals were not authorized and would
8 cause Plaintiff the damages and injuries alleged herein. Yet, Defendant Buckley elected to assume
9 the risks thereof and proceeded with the publication, dissemination, portrayal and distribution of
10 Plaintiff in such a harmful, offensive and injurious false light.

11 54. Defendant Buckley knew that the portrayal of Plaintiff would be seen and perceived
12 by people in a manner which reasonably would bring contempt, ridicule, disdain, embarrassment,
13 offense and humiliation upon Plaintiff.

14 55. Defendant Buckley also knew that the portrayal would be disruptive and harmful to
15 Plaintiff's education and standing at the University.

16 56. The false-light portrayal of Plaintiff was made public, by Defendant Buckley
17 communicating it to multiple people either individually, or by way of posting on social media,
18 (who then re-distributed the false light portrayal) that the false-light portrayal is becoming public
19 knowledge. Notwithstanding the foregoing, Defendant Buckley made a conscious decision to
20 ignore the risks and injury which would be suffered by Plaintiff and proceeded to engage in the
21 unlawful behavior alleged herein.

22 57. As a result of Defendants' conduct, recipients and viewers of the false-light portrayal
23 came to associate Plaintiff with such portrayal instead of Plaintiff's true and intended public image.

24 58. As a proximate, direct, legal and actual cause of the foregoing conduct, disregard, use,
25 dissemination and distribution of the false-light portrayal of Plaintiff alleged hereinabove, Plaintiff
26 sustained harm to his reputation and education. Harm would not have occurred had Defendant
27 Buckley acted lawfully and not made the conscious decision to harm Plaintiff.

1 59. Defendant Buckley knowingly and consciously distributed the Snapchat Video of
2 Plaintiff in a manner which was designed to (and which did become) quite public and such
3 portrayal was communicated by Defendants in a manner to achieve widespread distribution to
4 other individuals. The conduct of the Defendants was certain to become public and to go public in
5 a massive way. These desires were achieved at Plaintiff's expense, harm and injury.

6 60. Defendants acted in reckless disregard as to the falsity of the publicized matter.

7 61. As a direct, foreseeable, legal, actual and proximate result of the Defendants' false
8 portrayal of Plaintiff, Plaintiff has suffered and continues to suffer, loss of quiet enjoyment,
9 inconveniences, decreased quality of life, humiliation, ridicule, contempt, embarrassment, severe
10 mental and emotional distress, discomfort and other damages in an amount which will be proven
11 at trial.

12 62. Defendant Buckley committed the acts described herein intentionally, willfully,
13 oppressively, fraudulently and maliciously for the purpose of injuring Plaintiff. Therefore, punitive
14 damages against Defendant Buckley are justified.

15 63. A reasonable person in Plaintiff's position would be highly offended and would suffer
16 injuries as a result of the false portrayal of Plaintiff by Defendants.

17 64. In addition to the foregoing damages, Plaintiff requests that this Court grant injunctive,
18 declaratory and equitable relief as provided by law.

19 **FOURTH CAUSE OF ACTION**
20 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
21 **(Against Defendant Ethan Buckley)**

22 65. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 64
23 as if fully set forth herein.

24 66. The Defendant's malicious conduct of repeatedly distributing the Snapchat Video,
25 emailing the Snapchat Video to the University, forwarding the Snapchat Video to others, making
26 false accusations about Plaintiff, with the intent to damage Plaintiff's reputation and academic
27 standing is extreme and outrageous conduct. Such actions exceed the bounds of what is tolerated
28 in a civilized society.

67. Defendant intended to cause, or acted with reckless disregard of the probability of causing, Plaintiff severe emotional distress.

68. Defendant's conduct was a substantial factor in causing Plaintiff's severe emotional distress.

69. As a result of Defendant's actions, Plaintiff has suffered, and continues to suffer, severe emotional distress, as evidenced by the impact on his academic standing, relationships, and mental well-being.

FIFTH CAUSE OF ACTION HARASSMENT

(Against Defendant Ethan Buckley)

70. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 69 as if fully set forth herein.

71. Defendant has engaged in a course of conduct directed at Plaintiff.

72. Defendant's actions were persistent and aimed at damaging Plaintiff's reputation and academic standing.

73. Defendant's conduct seriously alarmed, annoyed, or harassed Plaintiff.

74. Plaintiff was seriously alarmed and harassed by Defendant's persistent harmful actions of distributing the Snapchat Video to third persons for purposes of harassing Plaintiff and causing him substantial emotional distress.

75. The Defendant's actions, including the repeated distribution of the Snapchat Video, the submission of complaint(s) to the University, and on information and belief, the dissemination of the Snapchat Video to others by way of electronic communications including but not limited to email, text message, and/or direct messaging on social media, constitute a pattern of harassment. These actions were aimed at damaging the Plaintiff's reputation and preventing him from graduating from college at the University, thereby interfering with his social, educational, and professional opportunities.

76. Defendant's conduct would cause a reasonable person to suffer substantial emotional distress.

1 77. As a result of Defendant's conduct, Plaintiff reasonably fears for his safety in that he
2 may be confronted by someone who has viewed and been offended by the Snapchat Video or will
3 become the focus of organized campus activism.

4 78. As a result of Defendant's harassing conduct, Plaintiff has suffered substantial
5 emotional distress as a result of the significant harm to his reputation, safety, and academic
6 standing.

7 **SIXTH CAUSE OF ACTION**
8 **TORTIOUS INTERFERENCE**
9 **(Against Defendant Ethan Buckley)**

10 79. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 78
11 as if fully set forth herein.

12 80. Defendant's actions have disrupted, and may continue to disrupt, Plaintiff's ability to
13 maintain a contractual relationship with the University.

14 81. Defendant's actions in this case, including the false accusations and widespread
15 distribution of the Snapchat Video, have interfered, and continue to interfere, with the Plaintiff's
16 ability to complete his education and secure future employment opportunities.

17 82. Defendant has engaged, and continues to engage, in intentional and malicious acts
18 designed to disrupt Plaintiff's relationship with the University, as evidenced by his repeated
19 actions despite prior apologies and assurances that he would not distribute the Snapchat Video to
20 others.

21 83. As a result of Defendant's actions, Plaintiff's educational opportunities were disrupted
22 by having to address and defend the repeated accusations and complaints against him arising from
23 Defendant's dissemination of the Snapchat Video.

24 84. Defendant's interference resulted in economic harm to Plaintiff.

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1 **SEVENTH CAUSE OF ACTION**

2 **DOXING**

3 (Against Defendant Ethan Buckley)

4 85. Plaintiff incorporates and realleges the allegations set forth in paragraphs 1 through 84
5 as if fully set forth herein.

6 86. Plaintiff alleges that Defendant intentionally disclosed Plaintiff's personal identifying
7 information ("PII"), including but not limited to his full legal name, the private Snapchat Video,
8 and the name and location of the college where Plaintiff attends, multiple times from July 17, 2023
9 to the present.

10 87. The disclosure of Plaintiff's PII was made by email, text and/or direct messaging on
11 social media.

12 88. The disclosure of Plaintiff's PII was also made through Ethicspoint, a confidential,
13 online and telephone-based system for reporting misconduct or violations of university policies
14 for the University.

15 89. Defendant made the disclosure with the intent to cause, or with reckless disregard of
16 the risk of causing, harassment, harm, or significant emotional distress to Plaintiff.

17 90. As a direct and proximate result of Defendant's disclosure, Plaintiff experienced
18 substantial emotional distress, fear for personal safety, reputational harm, academic disciplinary
19 investigation, and embarrassment.

20 91. Plaintiff did not consent to the disclosure of his PII, and such disclosure served no
21 legitimate public interest or legal purpose.

22 92. Defendant's conduct constitutes a violation of California Civil Code § 1708.89, which
23 prohibits the intentional distribution of personal identifying information with the intent to incite or
24 threaten physical harm or harassment, or with knowledge that the information will be used to
25 commit such acts.

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V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

- A. For non-economic compensatory damages for loss of reputation, shame, mortification, and emotional distress in an amount to be determined at trial;
- B. For economic damages according to proof at the time of trial;
- C. For statutory damages of \$30,000 under Civil Code § 1780.89(c);
- D. For punitive damages in an amount to be determined at trial;
- E. For a preliminary and permanent injunction enjoining and restraining Defendant from engaging in the conduct alleged herein including distribution of the Snapchat Video;
- F. For reasonable attorneys' fees and costs of suit incurred herein; and
- G. For such other and further relief as the Court may deem just and proper.

Date: June 19, 2025

RANDICK O'DEA TOOLIATOS
VERMONT & SARGENT, LLP


By: Christi M. Raimondi

VERIFICATION

I am the plaintiff in the above-entitled matter. I have read the complaint and know the contents thereof. The matters set forth in the complaint are true and correct to the best of my knowledge and belief. As to the matters stated upon my information and belief, I am informed and believe those matters to be true. I declare the foregoing to be true and correct under penalty of perjury pursuant to the laws of the State of California.

Date: 6/20/2025 John Doe
JOHN DOE
Plaintiff

REDACTED

EXHIBIT A

COMPLAINT

REDACTED

Bargoot, Rachel

From: Hilpert, Tristan
Sent: Thursday, August 29, 2024 1:47 PM
To: Bargoot, Rachel
Subject: FW: Racism on Campus
Attachments: cm-chat-media-video-1033da353-c7ad-5080-9e2b-ffa3a59702b43307900.MOV

-----Original Message-----

From: Ethan Buckley <ethansbuckley@gmail.com>
Sent: Tuesday, August 27, 2024 3:07 PM
To: Parlow, Matt <parlow@chapman.edu>; Rogan-Mehta, Amy <roganmehta@chapman.edu>; Price, Jerry <jprice@chapman.edu>
Subject: Racism on Campus

External Message

To whom it may concern:

There is a video (attached) of one of your students going around that I thought you all should be aware of. The student involved is [REDACTED] class of 2025. He is seen and heard, while wearing a Chapman shirt, using the racial slur (n-word), and stating that he is faded, meaning he is high on marijuana or some other type of drug. This is completely unacceptable for any of your students and [REDACTED] should be held fully accountable and be disciplined for this violation of your Student Conduct policies. I believe this student does not even deserve to be educated at this institution, being that he is known to display this behavior on repeat.

NOTE: This email originated from outside Chapman's network. Do not click links or open attachments unless you recognize the sender and know content is safe.

REDACTED

EXHIBIT B

COMPLAINT



[Draft] RE: Dean of Students Office- Information and Meeting Request

From Bargoot, Rachel <bargoot@chapman.edu>
Draft saved Wed 6/4/2025 4:30 PM
To [REDACTED]
Cc Hilpert, Tristan <hilpert@chapman.edu>

2 attachments (170 KB)
EthicsPoint case detail 158.pdf; case_157.doc.pdf;

Hi [REDACTED]

I am glad we were able to connect today. As you requested, I attached a PDF of the report we received. Since our meeting this morning, we learned there was another report submitted- I have attached the PDF of that one as well.

As I mentioned this morning, you are more than welcome to come use my Calendly at your convenience should you want to chat again.

All the best,
Rachel

Rachel Bargoot
(she/her/ hers)
Program Coordinator
Chapman University
714-516-5649

From: [REDACTED]
Sent: Thursday, February 27, 2025 10:04 AM
To: Bargoot, Rachel <bargoot@chapman.edu>
Subject: Re: Dean of Students Office- Information and Meeting Request

Rachel, I am very concerned. My class ends at 11:15 I will come to you directly after.

Get [Outlook for iOS](#)

From: Bargoot, Rachel <bargoot@chapman.edu>
Sent: Thursday, February 27, 2025 9:56:50 AM
To: [REDACTED]
Subject: Dean of Students Office- Information and Meeting Request

Hello [REDACTED]

I hope your spring semester is going well thus far. I am writing to inform you that there has been an anonymous report to the university regarding the video we discussed in September. I wanted to check in to inform you of this development and make sure you have the support to handle the situation. I would be happy to meet with you to

REDACTED

6/4/25, 4:32 PM

Mail - Christi Raimondi - Outlook

discuss your experience further and review resources. I want to emphasize that you are under no scrutiny at this time- I simply want to ensure that you are well and safe.

Would you be willing to meet with me sometime next week? We can reserve a time to meet if you email me a few options, or you are also welcome to schedule a time that works well for you using my Calendly page:

[Schedule an appointment here](#)

I hope to speak with you soon.

All the best,
Rachel

Rachel Bargoot
(she/her/ hers)
Program Coordinator
Chapman University
714-516-5649

Case: 157 - Hotline Web
Chapman University
Other

Case Snapshot

Opened: 02/25/2025
Days Open: Less than 24 hours
Last modified: 02/25/2025 2:26 PM
Intake Method: Hotline Web
Status: Reviewed
Alert: Green

General Case Info

Case number:
157
Received/Reported date:
02/25/2025
Language:
English
Assigned tier:
Chapman University
Issue
Primary issue:
Other

Case Details

Reported tier information

Case type:
Allegation
Intake method:
Hotline Web

Location

Organization/Building name:
Chapman University
Location/Address:
Online

Reporter Information

Reporter anonymous:
Yes

Case Information

Relationship to Institution:
Student

Please identify the person(s) engaged in this behavior:
[REDACTED] - Student

Do you suspect or know that a supervisor or management is involved?
No

Is management or the department aware of this problem?
No

What is the general nature of this matter?
Student is saying a racial slur.

REDACTED

How long do you think this problem has been going on?

Don't know

How did you become aware of this violation?

I observed it

Case Details:

Student posts hard "r" slur on social media frequently, making students of color including myself feel uncomfortable and unsafe.

Legacy information

Participants

Name	Job Title	Relationship	Role	Results	Notes
	Student	None	None	None	

Attachments

Files from Reporter

If your browser is having trouble viewing or playing the file, you can proceed to download the file by right-clicking the file link and select Save As.

	File	Description	Date
#1	f559997c9f104db3a646b6ab20dfcfc.mov		02/25/2025
#2	f559997c9f104db3a646b6ab20dfcfc.mov		02/25/2025

Synopsis

Outcome of case

Primary outcome:

- Select One -

Secondary outcome 1:

- Select One -

Secondary outcome 2:

- Select One -

Action taken:

- Select One -

Additional details

**Case: 158 - Hotline Web
Chapman University
Other**

Case Snapshot

Opened: 02/27/2025
Days Open: Less than 24 hours
Last modified: 02/27/2025 10:58 AM
Intake Method: Hotline Web
Status: Reviewed
Alert: Green

General Case Info

Case number:
158
Received/Reported date:
02/27/2025
Language:
English
Assigned tier:
Chapman University
Issue
Primary issue:
Other

Case Details

Reported tier information

Case type:
Allegation
Intake method:
Hotline Web

Location

Organization/Building name:
Chapman University
Location/Address:
Chapman University campus

Reporter Information

Reporter anonymous:
Yes

Case Information

Relationship to Institution:

REDACTED

Student

Please identify the person(s) engaged in this behavior:

[REDACTED] - Student

Do you suspect or know that a supervisor or management is involved?

No

Is management or the department aware of this problem?

No

What is the general nature of this matter?

[REDACTED] says the n-word and other profane language using hard r making students feel unsafe and disrespected. [REDACTED] was wearing Chapman merchandise, representing the school with this horrible language.

Where did this incident or violation occur?

Captured on video posted online.

Please provide the specific or approximate time this incident occurred:

Recurring.

How long do you think this problem has been going on?

3 months to a year

How did you become aware of this violation?

I heard it

If other, how?

Posted online.

Case Details:

[REDACTED] graduating spring 2025, continuously using profane language and disrespecting the student body. He should not be able to graduate and represent Chapman.

Legacy information

Follow-ups

Reporter Additional Information

There are no additional notes for this incident.

Questions/Comments and Reporter Responses

There are no questions asked by the client.

Participants

Name	Job Title	Relationship	Role	Results	Notes
[REDACTED]	Student	None	None	None	

Synopsis

Outcome of case

Primary outcome:

- Select One -

Secondary outcome 1:

- Select One -

8

REDACTED

Secondary outcome 2:

- Select One -

Action taken:

- Select One -

Additional details

REDACTED

EXHIBIT C

COMPLAINT

REDACTED

Chapman University

To Whom It May Concern:

My name is Ethan Buckley. About two years ago my former friend, [REDACTED] who attends Chapman, recorded a video of himself saying the N word and then sent it to me and others in our friend group through a group chat on social media. About a year later, we had a falling out and I felt very hurt by [REDACTED] I made the decision to share [REDACTED] video with Chapman University. He is not a bad person but he was young and said some terrible things. No one is perfect and everyone makes mistakes including myself. I regret forwarding that video and have since deleted all copies that I have of the video. I will not try to harm [REDACTED] in the future.

~Ethan Buckley

