

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

DR. SABINA BURTON,
Plaintiff,

v.

Case No. 14-CV-274

BOARD OF REGENTS UNIVERSITY
OF WISCONSIN, et al.,
Defendants.

DECLARATION OF ALEXANDRA ZUPEC

Pursuant to 28 U.S.C. § 1746, Alexandra Zupec declares, as follows:

1. I am an adult resident of the State of Illinois and I make this declaration based on personal knowledge.

2. I am currently employed in an office administrative assistant position for a construction company.

3. I was a student at UW-Platteville from August, 2009 to December, 2013, majoring in criminal justice with an emphasis in law enforcement and a minor in psychology.

4. In the fall of 2012, I was enrolled in a course called Research Methods in Criminal Justice, taught by Dr. Lorne Gibson.

5. That semester, there were about 20-25 students in my Research Methods class.

6. Dr. Gibson divided us into groups of students, with each group to work cooperatively on a particular in-class project.

7. On October 10, 2012, there were about six students in my group, and were sitting in a circle very close to one another.

8. Dr. Gibson walked up beside me and slipped a note under my books, in plain view of the other students in my group.

9. We made eye contact with one another, and one student said to me "hurry up and look at it;" "what did he just ask you."

10. I picked up my notebooks, unfolded the note, read it and showed it to the students in the group.

11. I was shocked and incredibly embarrassed by the note and that he had given it to me in front of the other students.

12. I was nervous about it and asked the group what I should do. Someone suggested that I talk to another teacher about it.

13. I photographed the note on my phone and a true and accurate copy of that photograph is attached to this Declaration as Exhibit A.

14. I put the note in my purse and we continued to work on our project, though I was very distracted during the class and very nervous about what might happen next.

15. Later that day I had a class with Dr. Burton.

16. I approached Dr. Burton after class, showed her the note and asked her what I should do.

17. Dr. Burton told me that the note was inappropriate and that she would contact someone at the University to learn who I should talk to about it.

18. Dr. Burton also said that she would talk to the Chair of the Department, Dr. Caywood, but I told her that I didn't want to talk to Dr. Caywood because he was my academic advisor and I wasn't comfortable going to him with this situation.

19. I was uncomfortable about the thought of going to Dr. Caywood because my impression of him was that he couldn't care less about me.

20. Later, after Dr. Burton had notified the student affairs office about the situation, a representative from student affairs contacted me.

21. The student affairs representative apologized to me for what had happened and reported to me that the matter had been handled and that I had nothing to worry about. I thanked her.

22. On October 11, Dr. Gibson wrote an email to all of the students in the class saying that he had conducted an experiment and apologizing to any students "who weren't aware" of that.

23. He wrote in the email "I made a mistake in assuming it was easily apparent" that he was conducting an experiment with the note.

24. Dr. Gibson's email made me feel even worse about him having given me the note, because it makes me look like an idiot for not "understanding" what he was trying to do.

25. I felt that Dr. Gibson was mocking me by his email, like I never should have brought up what happened.

26. It made me feel small because, as a student, those things should not be swept away and since it was, I felt like I was just a nobody to the school and the Department, and like what happened to me was not important to them.

27. Sometime later, Dr. Caywood called me into his office. He said that this was all a misunderstanding, that the note from Dr. Gibson was an experiment and that he had approved it.

28. I told him that I was uncomfortable with the entire situation, that it was completely inappropriate and that more people in the Department should have been made aware of any experiment than just him.

29. Dr. Caywood repeated that it was a misunderstanding and a result of a lack of communication.

30. I continued to be embarrassed by the situation and I was afraid to continue to attend Dr. Gibson's class.

31. I did not to pursue it any further because I was told that it had been handled and because the Chair and my professor had been so dismissive of the significance of my being upset and my embarrassment.

32. As a result, I concluded that it would only make me feel worse if I pursued the incident any farther.

33. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2015


Alexandra Zupec