

"Injustice anywhere is a threat to justice everywhere"
Martin Luther King

UNITED STATES DISTRICT COURT

for the
District of Col

Aleksei Klusov
Plaintiff/Peritioner
v
Georgetown University
Defendant/Respondent

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24-cv-02587-RCL

Jury trial demanded.

COMPLAINT WITH CLARIFICATIONS

I Aleksei Klusov, allege as follows:

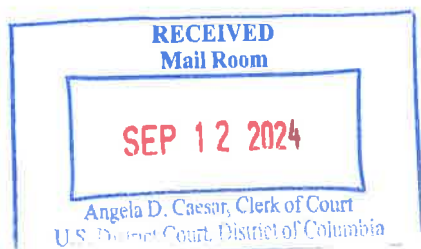
JURISDICTION AND VENUE

This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1343 over claims arising under Title VI of the Civil Rights Act of 1964 ("Title VI") (42 U.S.C. § 2000d *et seq.*). This Court has supplemental jurisdiction over plaintiff's various related state-law claims under 28 U.S.C. § 1367(a) because those claims arise out of the same case or controversy as plaintiff's federal claim. This Court has personal jurisdiction over Georgetown University because it is based and operates in Washington D.C.

Venue in the District of Columbia is proper under 28 U.S.C. § 1391 because it is the judicial district in which the events and the omissions giving rise to plaintiff's claims occurred and where defendant (Georgetown University) is located and domiciled.

PARTIES

Plaintiff Aleksei Klusov is an alumnus of Georgetown University, has Jewish and Russian national origin, and was a graduate student in 2023-2024 at Georgetown University ("GU") pursuing 2



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degrees simultaneously, in particular full MBA at McDonough School of Business ("MSB") and enhanced LL.M in Taxation at Georgetown University Law Center ("Georgetown Law").

Defendant Georgetown University is the legal name of Georgetown University and its schools (including MSB and Georgetown Law), a private not-for-profit university based in Washington D.C.

The Georgetown University's endowment fund was valued at \$3,298,969,000 (Note 8 to consolidated Financial Statements) as of June 30th, 2023. This amount and valuations are confirmed in all material aspects by independent auditors Deloitte & Touche LLP. Georgetown University accepts substantial direct financial assistance from the federal government through, among other things, grants, tuition paid with federal financial aid, etc.

PRELIMINARY STATEMENT

1. There are dozens of universities in the US against which lawsuits were submitted in different states by students, student groups, various representatives and activists, mainly after the October 7th, 2023, massacre because of hypocrisy and violations of federal and state authority. There is almost a hundred of such lawsuits. The most famous judge Richard Posner raised a huge issue in the American legal system with pro se litigation and inherent power imbalances at play. In his opinion pro se litigations (or average Americans using another language) must a right to a fair trial. Before I called the court about the registration number of my Complaint and Chay explained that it takes a long time (many weeks) to receive the complaint from the mail room and that there is no bench of pro bono enthusiast attorneys on records at the court. Although I am a foreign-trained JD equivalent for American law schools and have successful foreign litigation experience I need to find an experienced in civil rights and other matters attorney, hopefully, pro bono. Otherwise, it

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could look like the David and Goliath battle, as in ancient Jewish myth. It is complicated because DC is a relatively small jurisdiction compared to NY, TX, CA, and other states. Some pro bono attorneys like Gibson Dunn surprisingly work partially for profit and partially pro bono and collect information to share with more than a hundred non-attorney "experts" for unknown reasons, i.e. professional responsibility requirements are not satisfied sometimes. In the pro se and other forms I submitted my email and phone number. No one reached me. If possible please kindly contact me for the clarifications because it was explained that I am not able to speak with the law clerk.

2. I believe in the rule of Law, equality, and transparency. I have zero tolerance to injustice at Georgetown University and other places because I am a principled leader with a track record and high ethical standards. I am a poet and quant akin to some MBAs, with experience in several niches of tax law. I was a proactive overachiever and led by example. I always put values and principles first as the highest priority. I was weaned in 1990-s on American movies and stories that in America there is equal access to opportunity, economic and political freedom, rule of law, and no discrimination. People must have rights to take advantage of equal opportunities to live American Dream. I still don't know if it is a real true.

3. I was a dual degree full MBA and enhanced LL.M in Taxation graduate student at Georgetown University business and law schools. Georgetown University conducted experiments on me because there were no other people with such combined simultaneous programs. There are and there were only JD/MBA programs. During my studies I was nominated and then selected for the study abroad program at London Business School (LBS) and audited an additional 13 courses¹ at Georgetown Law without transcript records. There were many discrimination incidents when I

¹ Tax Planning for Real Estate Transactions, Essentials of Fintech Law, International Inbound Tax, International Outbound Tax, Advanced Taxation of Partnerships, S Corporation and LLC Taxation, Corporate Income Tax Law II, Advanced International Tax, Tax Treaties, Taxation of Financial Transactions, Consolidated Tax Returns; Takeovers, Mergers, and Acquisitions; Taxation of Financial Institutions.

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was bullied and harassed, excluded from certain opportunities because of my national origin and other grounds. Students, admins, and professors were informed that I have Russian and Jewish national origin with some Ukrainian roots; I have a specific accent and name, and too some extent, limited English proficiency. There were no rational reasons for numerous hate incidents, inappropriate actions, omission of actions, and systematic intentional mistakes that had a purpose to discriminate and deprive from opportunities. There were systematic insult messages and behavior, mistakes, dehumanization, breach of confidentiality, and other wrongdoings because of my national origin and other grounds. There were threats to my life and career, I was targeted and had a fear for my life. For example, inappropriate **"sucks" language with respect to my national origin from a professor or a burn like in tank commination from student in response to a festival information** (like October 7th attack) and other threats. Disallowance to wear national color tie and removal of Rule of Law from the slide. It was and it is not safe on Campus because of threats from some students. Even highly ranked officials like many of Georgetown Law admins were indifferent to the wrongdoings and failed to take appropriate actions (while it was requested for many months to meet and resolve). They refused to meet and to listen numerous times. My complaints and claims to investigate harassment and discrimination were ignored systematically by members of Diversity, Equity, and Inclusion IDEAA team as well as administrators and deans, offices of president and board of directors.

4. Georgetown University campuses became viciously **hostile environments for Russian and Jewish students**. In recent years Georgetown University suffered many times because of racist and corruption scandals (see below). There are awful human tragedies every day and GU discriminates and misrepresents, GU created damages instead of protecting and fulfilling the

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obligations to the client. I am forced to reveal truth to the regulator (Department of Education) because there are multiple violations of Title VI and relevant authority.

5. Discrimination issues are continuing now. Earlier Georgetown University employees made unauthorized disclosures of private information to BOLE (board of law examiners in New York State). Because of such communications with the connections that Georgetown Law has (as explained by officials) on the date when my original complaint was transferred to OCR I received a letter from the BOLE employee with the following notices:

(i) that my rights to speak are restricted (i.e. I don't have rights to make calls and to speak neither with the board members nor with staff (while I wait for many months for responses, this is like in famous Supreme Court precedents when 1st Amendment rights were restricted);

(ii) that I do not have rights to receive bar exam results despite paying much higher fees; and

(iii) that I am again was unable to register for another bar exam² (July 2024 NY bar exam).

6. BOLE requested multiple times to surrender my rights based on Fair Credit Billing Act (1974) while earlier BOLE was already not in compliance with FCBA (unfair billing) because they lost the dispute over the excessive fees pursuant to FCBA (1974) for the services that were not provided. Issues with BOLE can be a result of the communications of Georgetown Law with BOLE employees (see below) and a non-transfer of my Certificate of Attendance with an explanation, as well as misinformation about Rules for bar eligibility³.

7. Georgetown University selectively enforces its policies to avoid protecting Jewish and Russian students, allows professors to support violence and violate privacy rules, spread

² It was not allowed to take July 2023 bar exam (while other similarly situated Georgetown Law students with the same October 1 date issue received permission because Georgetown Law selectively helped other students while acting against me), for February 2024 exam I had incredible fight for my rights but the access to the ticket was blocked, until the exam it was unclear will they allow to take it or not.

³ I paid \$1,920 (768% of standard fee for February 2024 exam or 256% of the premium fee) to take the exam with the permission that was distributed in less than 4 weeks prior to the exam. Please see below in the episode the breakdown and the explanation with a FCBA violation.

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Russophobia propaganda, and ignores Jewish and Russian students' pleas for protection. Georgetown University failed and refused to stop outrageous conduct and discipline the students and faculty who perpetrate it. Georgetown University permits students and faculty to advocate, without consequences, the murder of students with Jewish and Russian roots. There are dehumanization efforts towards students based on national origin and other grounds. GU systematically breaches its duty to students with Jewish and Russian roots. IDEAA office as well as numerous administrators and deans at Georgetown University and its schools do nothing to investigate issues and to protect from discrimination, hate, and bias. From year-to-year IDEAA office did nothing with respect to national origin SUCKs language and targeting because, threats to kill, numerous incidents, and deprivation from educational and employment opportunities. At the same time other students were treated differently.

8. I have good judgement and understand some niches of tax law, have above average experience. Although I am *naïve*, sometimes I understand when there is misinformation (though not immediately). I was surprised to hear from Georgetown Law official that based on his personal experience education is a business while GU charter states it is not for profit.

9. I am an experienced tax professional with a track record. I have a specialist degree in legal studies (a 5-year full study program) that was evaluated as combined bachelor's and master's law degree and recognized as JD equivalent by ABA approved law schools in the US, LSAC CAS system for American law schools, and a reputable ECE evaluation system.

10. Earlier in Moscow I participated in and contributed to more than 2 dozen litigation projects outside the U.S. and famous court cases⁴ were created because of my direct efforts. Such

⁴ For instance, see the following tax court cases that are publicly available: A40-255442/16, A40-143354/13, A40-94491/12, A40-164864/14, A40-11346/12, A40-132494/12, A40-30797/11, A40-11909/12, A40-98646/11, A40-132387/13, A40-65624/14, A40-171364/12, A40-100177/13, A40-164864/14, A40-63455/15, A40-241361/15, A40-118598/15, A40-442/15.

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cases resulted, *inter alia*, tax alerts, professional discussions, club meetings, and articles, a few court cases have precedent value. Thus, I made the world a better place to live.

11. I am a principled and "*humbitious*" leader with high ethical standards and integrity. I have a background in taxation of financial institutions and investment transactions. I worked in different sides in taxation for more than a decade and I am proud of my achievements because I already made this world a better place to live due to direct and indirect incremental cash tax flows for society, and tax improvements. I was a speaker at tax conferences⁵ and lecturer⁶ at professional tax seminars for employees of banks and other financial institutions. It is obvious that experienced tax professionals will not visit seminars, lectures, and conferences, with someone who has nothing to say and/or didn't contribute to the tax law. I have awards, appreciations, and a high-class rank. I always was an overachiever and was shocked about the differences between marketing images of Georgetown University and the reality with the misinformation, discrimination, harassment. Initially I was surprised how MBA classmates make jokes about foreign students not understanding anything in the US education then I realized that this is GU policy to take advantage of unfamiliar students.

12. During my dual degree studies at Georgetown University, I personally observed conflicts of interests in the dealings of professors and administrators, involvement in greenwashing, unethical behavior, the inappropriate usage of alumni and endowment funds, e.g. with certain transactions and unauthorized trades. Now I know about the publicly available

⁵For instance: "*Russian international tax week*" (4/11/2018), conference arranger - IFA ; "*Tax policy for 2018: how major companies manage risks*" 4/11/2018; "*Private Equity and M&A*" (4/13-14/2017, conference arranger-Regent Capital Communications); "*Countermeasures for taxable profits erosion and profits shifting (BEPS)*" (November 24, 2016, conference arrangers: Reuters, KPMG, PWC); Round table for financial institutions: "*Expectations for the new tax season*" (11/25/2015, round table arranger – Deloitte); Round table for financial institutions: "*Results of the tax audits*" (11/24/2014, round table arranger – Deloitte); "*Taxation of financial transactions in financial institutions and non-financial entities*" (11/28-29/2013, conference arranger – C5 Communications Limited); "*Processing Derivatives and Structured Products*" (4/25-26/2013, conference arranger – C5 Communications Ltd); and others.

⁶NGPU CE «Institute of Modern Banking» (ANO DPO «IMB»); NGPU «Banking Institute of the Association of Russian Banks»; ANO «Training Center SKRIN»; NGPU «Moscow International Financial and Banking School» (IFBC at the Financial University); NOO NP «Consultant Business School»; «Financial Consulting» LLC; NGPU «UC Vneshtaudit»; Publishing House «Metodology» LLC.

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scandals with corruption (see Varsity Blues scandal⁷). There is and there was racism and SYSTEMATIC discrimination combined with events and inappropriate speech against Afro-American⁸, Asian⁹, Jewish¹⁰, Russians (see below). All that is just the tip of the iceberg.

We have discussed with professors Mayo and Maher shadow strategies for businesses and nonmarket environment in DC area and the applicability of the regulatory capture theory with respect to my questions on antitrust issues with Facebook and Microsoft. Everyone remembers Steve Jobs and his opinion that Microsoft. I want to believe that there is Rule of Law and numerous nonmarket strategies and lobbyists do not affect justice simply because Georgetown University is marketed as place for elite and located in Washington DC.

FACTS

Different types of episodes

⁷ <https://georgetownvoice.com/tag/admissions-scandal/>

⁸ <https://abcnews.go.com/US/georgetown-law-professor-terminated-remarks-black-students/story?id=76413267>

<https://www.foxnews.com/us/former-georgetown-law-professor-called-racist-students-delivers-lecture-free-speech>

⁹ <https://www.nbcnews.com/news/asian-america/georgetown-law-professor-apologizes-criticism-calling-student-racial-s-rcna16489>

<https://thehoya.com/news/yet-another-gule-professor-makes-racist-statement/>

¹⁰ <https://www.washingtonpost.com/education/2022/05/05/after-controversies-georgetown-law-students-call-culture-shift/>

<https://www.nationalreview.com/corner/georgetown-law-dean-defends-hosting-antisemite-citing-previous-speakers-who-find-gay-marriage-immoral/>

<https://www.foxnews.com/lifestyle/jewish-students-georgetown-law-fear-violence-amid-rhetoric-classmates-anti-israeli-groups>

<https://thehill.com/opinion/4337687-justifying-hamass-barbarism-on-the-sly-at-georgetown-law/>

<https://mosaicmagazine.com/picks/israel-zionism/2022/04/georgetown-law-school-hosts-a-notorious-anti-semite/>

<https://www.adl.org/campus-antisemitism-report-card/georgetown-university>

<https://www.jns.org/israel-hating-faculty-train-diplomats-at-georgetown/>

<https://www.algemeiner.com/list/the-40-worst-colleges-for-jewish-students-2017/georgetown-university/>

<https://www.nationalreview.com/corner/hamas-sympathizers-at-georgetown-university/>

<https://www.foxnews.com/media/jewish-college-students-scared-class-blame-universities-silence-antisemitism>

<https://www.timesofisrael.com/med-students-antisemitic-comments-after-oct-7-riot-two-prominent-dc-universities/>

<https://georgetownvoice.com/2024/03/22/amid-rise-of-antisemitism-jewish-students-seek-community/>

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13. Please see few examples of discrimination, harassment, different treatment based on shared ancestry, national origin, race, sex, and age, below in (examples from A to X).

Example A

14. Georgetown Law prohibited me from participating in the main tax employment program in the beginning of 2023 as well as in December 2023-February 2024 (February TIP employment program) because of my national origin and other grounds. Rumors and private information were shared with others inappropriately. Violation of privacy rights in unauthorized sharing of my private information with others including prospective employers, e.g. Big 4 firms PWC, KPMG, Deloitte, EY, other (e.g. Amazon).

15. Since 2001 the Annual Taxation Interview Program (so called TIP) has been the main source of employment opportunities. It is joint program for NYU graduate tax law students and Georgetown Law tax graduate students. There are dozens of employers, i.e. main tax employers in the U.S.

16. In 2020 I applied to both programs: full MBA at Georgetown University McDonough School of Business and LL.M. in Taxation at Georgetown University Law Center. I was accepted to both programs, and it was explained that I can participate simultaneously and graduate in May 2022. I relied on promises and explanations. Despite that as of February-May 2022 I had only 4

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courses on my Georgetown Law transcript and it was impossible to graduate since I needed from 10 to 15 courses on Georgetown Law transcript for the graduation. Their representations, warranties, promises, and explanations were wrong, it was even impossible to have Spring and other breaks because academic calendars are different at Georgetown University McDonough School of Business and Georgetown Law.

17. In February 2023 and February 2024, it was not allowed to participate in Annual Taxation Interview Program (TIP). I had a meeting with Caroline Springer and Sunita S Iyer from the Office of Graduate Careers (responsible for tax employment) because "you participated in TIP in 2022 you were not eligible to participate in TIP in 2023 and are not eligible to participate in TIP in 2024. Our policy is very strict about this." Moreover, Sunita S Iyer on Friday June 30th, 2023, explained that they are not being able to help with anything, they are not a placement agency.

18. Based on the FAQ1: Taxation Interview Program (TIP) 2022 Overview (see exhibit):
"4. How many times can a part-time LL.M. in Taxation student participate in TIP? Georgetown Law part-time LL.M. in Taxation candidates starting with the Fall 2019 entering class can only participate ONCE during their program of study, and in the last semester of their program. Also, keep in mind that TIP is not for alumni, except for those alumni who are concluding their clerkships at the U.S. Tax Court."

19. Thus, Georgetown Law initially put me in 2022 TIP program 16 months prior to graduation, i.e. not in my last semester of the program but more than a year ahead. This was in violation of the internal policies. I was deprived later of employment opportunities because it was

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not allowed to participate in TIP and Georgetown Law refused to share contacts of the representatives of employers (except BIG 4 representatives). There were no other than discrimination reasons to violate my rights and block access to employment opportunities. I had many tax interviews at the TIP but tax people complaint that I only have 4 courses and that this is not enough, I am far away from joining them, I need to finish or be close to finishing my Georgetown Law studies. Prior to TIP and the start of LL.M in Taxation program I had tax interviews. After that and unauthorized disclosure of private information and rumors by Georgetown Law officials there were no interviews except a few with KPMG where tax people were not able to understand why I don't go via campus employment.

20. For instance, in December 2023 Shannon Miskura from Deloitte was confused as well:

Are you not able to participate in TIP in 2024? At this point, we will be conducting most of our recruiting efforts at TIP, so it would be wonderful if you could participate...

21. Moreover, there was a leak of private confidential information. On April 18th, 2023, Spencer Price from Amazon wrote the following email: *"Hi Aleksei, I'm writing to follow up from your previous communication regarding the Tax Analyst role at Amazon. As you may recall, we had to put our hiring on hold. I am reaching out to gauge your interest in the position. The tax team is impressed with your background and believe that you could be a valuable addition to the organization. If you are still interested in the position, please reply to this email and I will have our recruiting coordinators reach out to start scheduling interviews immediately."*

22. Definitely I was interested in that position (it is my dream to join Amazon), and Amazon arranged several interviews on May 8th, 2023, including an interview with Tracey McClune, PMP (Senior program manager, Tax (TLDP) at Amazon). During the interview Tracey McClune explained that she meets with Georgetown Law people, and they speak about me, there are

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questions about the graduation, specifically if I graduate in 2023, i.e. there was a threat to my graduation. She cut the meeting early and later returned to me with an offer to reach alumni with shared rumors. The interview was performed via a special proprietary Amazon software called "Chime" and the recordings are available (unless there was a destruction of electronic evidence). Thus, there was a disclosure of private information and negative information. First of all, that was not true based on available information and such discussions could be a result of a breach of confidentiality of meetings and information by Ellis Duncan or others. Because of the discussions about me I didn't receive the job offer. Actually, that was my dream to join Amazon and a chance to work in a heritage of Mr. Bezos. The tragedy is that lots of GU MBA and LL.M graduates work at Amazon but without me.

23. Interestingly on May 11th, 2023, when we had Evidence exam the exam software collapsed, Registrar's office was not responding how to resume and utilize available 4-hour limit and I was forced to end exam in a high stress early with only 3 hours while other students were not discriminated (see exhibit). Maybe that was a realization of threats to me not to graduate that were discussed by Tracey McLune Amazon with Georgetown Law people.



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24. Later in December 2023 Caroline Springer advised to submit a complaint for investigation about the disclosure of private information based on the new version of Student Handbook of Academic Policy (2023-2024). Old versions of policies that were in force in 2020-Spring 2023 did not contain the procedures for the internal investigations of privacy violations. IDEAA office supervisors and employees Rosemary Kilkenny (head of IDEAA) and Olabisi "Bisi" Ladeji Okubadejo do not provide answers to my questions and as of now I do not see efforts to investigate the issues and prevent additional harm. At the same time my privacy issues are violated because of the disclosure of information without my consent with a freelancer located faraway from DC and without the rights to practice law in DC. While there are lots of law firms and forensic service providers in DC area with experience. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. Others are treated differently.

25. Thus, even in 2024 I was treated differently, and it was not allowed to enjoy the employment opportunities' (including TIP program) as well as standard employment opportunities in 2023-2024 were limited to me because of bias toward me and discrimination. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

26. More information on these issues is available in internal Amazon IT system that records interviews, in emails of officials, texts, and social media messages. I only can provide additional materials, explanations, and clarifications in this respect that is available to me.

27. Moreover, Caroline T. Springer made also inappropriate disclosure of private protected information to E. Duncan without my consent and as a manager breached supervisory duty over

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its subordinate who disclosed information. We see that for many months no actions were taken to cure the problem and this is another example of violation.

Example B

30. Certificate of attendance substitute (or something instead of my signed document) and the transcript were submitted for bar exam only on November 30th, 2023, (based on the information from email) instead of June 2023 with unreasonable delays compared to other students in May-November 2023. Disclosure of private information without consent. My signed certificate of attendance was not transferred as of today. Discrimination because other students' certificates were transferred.

31. My special document for New York State Board of Law Examiners (BOLE) Certificate of attendance was not transferred in May-June 2023 by Georgetown Law despite my requests and the extended deadline in June from BOLE. Georgetown Law officials promised to do it quickly in the Summer and provide explanations over Zoom. Promises were not fulfilled. Georgetown Law was not transferring my Certificate in August-November 2023 because they were interested to hide information about violations (e.g. canceled and not rescheduled classes, transfer of a course from MBA to LL.M transcript, inappropriate enrollments in 3 non-necessary for bar Summer courses and extra special JD course in violation of rules, etc.). Georgetown Law explained that without my authorization they uploaded something (not a signed certificate of attendance as all other students) only on **November 30, 2023, and as of now (May 28th, 2024), my certificate of attendance is not transferred in violation of rules.**

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32. In accordance with § 520.5 (c) the Rules of the Court of Appeals for the Admission of Attorneys and Counselors at Law the applicant shall submit to the State Board of Law Examiners such proof of compliance with the provisions of this section as the board may require.

33. Pursuant to the Instructions for the Certificate of attendance (please see current version¹¹): *"Instructions: This form must be completed by foreign-educated applicants for the bar exam who are required to successfully complete an LL.M. degree at an ABA-approved law school in the United States in compliance with Section 520.6(b)(3) of the Rules of the Court of Appeals for the Admission of Attorneys and Counselors at Law An applicant must submit the completed form to his or her ABA-approved law school for certification by an authorized official. The law school must submit this certified form and an original transcript directly to the Board no later than February 1st for the February examination and no later than June 15th for the July examination."*

34. As you see from the exhibit Georgetown Law canceled transfer of my transcript and didn't fulfill dozens of my requests to transfer Certificate of attendance and the transcript.

35. In accordance with § 520.6 (b) (3) (i)-(viii) of the Rules since May 18th, 2011, there are special addition requirements: a 24-month limit rule for LL.M studies, minimum 13 weeks requirement for a course and a 700 minutes requirement for 1 credit, and a maximum number of credits earned during Summer semesters must not exceed 4 (520.6 (b) (3) (iii)).

36. Please see the instruction at Georgetown Law regarding Certificate of attendance:

¹¹ https://www.nybarexam.org/foreign/NYSBOLE_LLMSchoolCert_FillableForm.pdf

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Certifications, Degree & Enrollment Verifications

CERTIFICATIONS & VERIFICATIONS

Certification requests are available, but not for attorneys.

* Degree Verification

* Enrollment/Good Standing Verifications

* Certifications of graduation, etc.

* Credit/Insurance Forms

The above certification requests are NOT accepted via telephone. All certification requests must be submitted with an original signature - electronic signatures are not accepted. The student must be a current student in the Law School's Registrar's Office. Please allow 10 business days for processing.

37. Here is the instruction on the Certificate from another law school (quotation):

"The LLM Certificate of Attendance"

This form is printed and filled out by you, checked by your LLM Program's Senior Program Coordinator (if you are a current student) and then is given to the Law School's Registrar's Office.

How do you submit this form to BOLE?

1. Go to <http://www.nybarexam.org/Docs/LLMCertificateofAttendanceForm.pdf>
 2. Download and print out the blank form (don't auto fill it online)
 3. Fill out everything **by hand** except for the "Law School Certification" at the end. You may need to cross out sections that auto-filled with incorrect information (such as "0").
 4. If you are a current student, go to your Program Coordinator (Nina Hrebenko for BFL, Miriam Evangelista for ALP and IP) and have them check the form for you.
 5. Submit the form to the Registrar's Office and tell them which bar exam you wish to take
- The Registrar's Office will fill out the "Law School Certification" and send the form, along with your transcript, to BOLE"*

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38. Other law schools have the same instructions on how to sign and submit Certificate of attendance¹² and the transcript to BOLE to move towards the goal of taking NY bar exam.

39. I have completed all the actions (see different instructions¹³) for the Certificate of Attendance and transcript transfer by Georgetown University but nothing had happened.

40. Earlier in May 2023 I asked senior deans and Registrar's of Georgetown University to transfer my Certificate of Attendance and correct the mistakes so I can take July bar exam. It was not allowed to fill in the form electronically and I received the instructions to complete the form in writing and submit it during the Summer to be able to process all bureaucracy.

41. Specifically, it was impossible to fill the Certificate form (sections 5 and 9) with other methods because the form had no areas to include all mistakenly taken Summer courses.

For each semester/term indicate below the dates of attendance for that semester/term (mm/dd/yyyy), the number of calendar weeks in each semester/term *excluding reading periods, examinations and breaks*, and whether you were enrolled full-time or part-time for each semester/term.

<u>Dates</u>		<u>Calendar Weeks</u>	<u>Full-Time or Part-Time</u>	
From	to	0	FT ☐	or PT ☐
From	to	0	FT ☐	or PT ☐
From	to	0	FT ☐	or PT ☐
From	to	0	FT ☐	or PT ☐

9. **Summer Credits.** Did you complete any hours of credit during summer semesters?

Yes ☐ No ☐

If "Yes," list the title, credit hours and dates of attendance for each course. [Rule 520.6(b)(3)(iii) permits a maximum of 4 credits to be taken during summer semesters/terms/sessions.]

<u>Course Title</u>	<u>Credit Hours</u>	<u>Dates of Attendance</u>
		from / / to / /
		from / / to / /

¹² E.g. see <https://www.bu.edu/law/files/2015/06/Admission-to-NY-Bar.pdf> or

https://connect.law.texta.edu/get_file?pid=afef3c876a2e4b2917657a456de62c5ebfa551d99cbf4f5f0c615f54485fe0

¹³ <https://www.law.georgetown.edu/academics/academic-resources/registrar/student-records/certifications-degree-enrollment-verifications/>

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Martin Luther King

42. A direct quotation from the letter dated June 2nd, 2023, from dean Tiffany Joly:

"I am your primary point of contact at Georgetown University. Moving forward, please send your emails directly to me. There is no need to copy other Georgetown administrators, I will include them if needed."

Unfortunately, the May 31 deadline to request a certification form for the July New York Bar exam has passed. The email from the Registrar notified students that NYBOLE extended the deadline for the law school to submit documents but made clear the deadline for students to submit the request was May 31.

If you did not submit the request by May 31, you will not be able to qualify for the July exam. If you plan to take the February exam you should consult the relevant deadlines."

43. In email dated May 31st, Tiffany Joly advised to transfer ASAP the Certificate of attendance and the transcript to seat for the February Bar exam because it was required in the opinion of Georgetown University to appeal to the highest court of New York State...

"...You may not receive an initial decision and/or response to your appeal until July and there is a possibility it will not be favorable. To save time and expense, I would advise you to consider resolving the issue over the summer then studying and sitting for the February exam if you are cleared by NYBOLE to proceed..."

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44. However, despite that for many months Georgetown Law was not transferring my Certificate of attendance and it is not transferred as of today. Specifically it is required from Georgetown Law to fill and sign the following section of the Certificate of attendance form:

12. Application Certification. By my signature below, I certify under penalty of perjury that all of my answers on this form are true and accurate in all respects to the best of my knowledge and understanding.

Applicant Signature _____

Date _____

LAW SCHOOL CERTIFICATION

The undersigned, being a duly authorized official of _____ hereby certify to the New York State Board of Law Examiners that all of the information contained in this form, including applicant's period of attendance, prescribed course of instruction and successful completion, is true and accurate. I further certify that the above named applicant was duly graduated from this law school with the degree of _____ on the _____ day of _____, 20____.

(Please DO NOT add the words "will be graduated" or otherwise modify the above certification clause. Court of Appeals Rule 520.6 requires graduation with the LL.M. degree before an LL.M. applicant may qualify to sit for the New York bar exam. This form should NOT be certified by the law school until the student has actually graduated.)

WITNESS my hand and seal of said Law School at _____

(City and State)

this _____ day of _____, 20____.

(SEAL)

Signature of Dean or other official authorized to sign

Print Name of Dean or Authorized Official

45. And it was clear that Georgetown University was not willing to transfer my Certificate of Attendance to hide their mistakes (see below). Registrar Cornelia Gustafson wrote in the email:

"...Additionally, as I have stated, we are more than willing to include your letter of explanation when we send the documents to New York. We need you to provide an actual letter that is separate from the form. The current version you have provided has your letter of explanation on the signatory page of the certificate of attendance. The letter needs to be a stand alone document, not added to the form."

46. Then on October 24th, 2023, Cornelia Gustafson made other empty promises and explained that they started communication of my private information with BOLE without consent:

"As always, many thanks for following up with us about your New York Bar Certificate of Attendance."

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Upon reviewing all of our correspondence, I believe we are at an impasse. There is not a match between the information that you want included on the actual Certificate of Attendance form and the information that we can certify. We do not draft Bar documents on a student's behalf because that is the student's responsibility. We can provide guidance, but we will not prepare a New York Bar Certificate of Attendance on your behalf.

We are committed to finding a solution that meets both your interests in sharing information and our requirements in terms of the document which we can certify. Therefore, we have contacted the New York Bar to see what guidance they can provide us as the certifying institution. We hope to have an answer soon and will follow up as soon as we hear something."

47. I have 30 credits on my LL.M transcript with 2 additional mistakenly transferred MBA credits to LL.M transcript from MBA transcript (course was paid with MBA tuition).

48. Also, that is clear that without 6 credits additional I was not able to qualify for NY bar exam because BOLE requires at least 24 credits on the transcript because a maximum number of credits earned during Summer semesters must not exceed 4 (§ 520.6 (b) (3) (iii)).

49. In violation of the Rules for the NY Bar eligibility Georgetown Law enrolled me in 3 unnecessary for Bar exam Summer 2021 online courses: Tax Practice & Procedure, Private Equity & Hedge Funds: Taxation and Transactions, Taxation of Intellectual Property (total 6 unnecessary for NY Bar exam credits). My total number of Summer credits is 10.

50. Christine L. Kenefick on January 4th, 2024, provided several answers from BOLE. It was explained that the maximum 2 courses (4 credits) Summer courses limit does not apply to me only because I have 30 credits total on my transcript and my additional mistakenly taken 6 Summer credits do not create ineligibility because I just need 24 credits on LL.M transcript. Otherwise,

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without 30 credits on the transcript, my additional 3 Summer courses (total 5 Summer courses 2 credits each) should have created a problem with eligibility for New York State Bar exam. Thus, I was forced to take an additional 6 credits to have 30 credits on my transcript in order to be able to qualify for NY State Bar exam. On January 4th, 2024, I had a quick phone conversation with Christine starting from 4:10 pm. I am very grateful for the conversation with Christine on January 4th and several answers. It was explained that the maximum 2 courses (4 credits) Summer courses limit does not apply to me because I have 30 credits total on my transcript and my additional 6 Summer credits do not create ineligibility because I just need 24 credits on LL.M transcript. Otherwise, without 30 credits on the transcript, my additional 3 Summer courses (total 5 Summer courses 2 credits each) could create a problem with eligibility for New York State Bar exam. Christine explained that there are no reasons to provide answers to all my questions (other questions). Also, although I did not ask, it was stated that there is no conspiracy behind it. It is so strange!

51. The Rules of the Court of Appeals for the Admission of Attorneys and Counselors at Law (Rules) in section 520.6 (b) establish certain additional requirements for LL.M degree for foreign trained attorneys, including a 24-month limit rule for the period of LL.M studies, minimum 13 weeks requirement for each course, and a minimum 700 minutes requirement for 1 eligible credit, maximum 4 credits for the courses taken during Summer Semester, etc.

52. Pursuant to the provisions of section 520.1 (b) (*Saving Clause*)¹⁴ various additional limitations do not apply to me *per se* because I studied Law in Moscow from 2000 to 2005 prior

¹⁴ § 520.1 General.

(b) *Saving Clause*. Those provisions of the rules of the Court of Appeals for the admission of attorneys and counselors at law that prescribe the qualifications for admission to the New York State bar examination, which were in effect at the time an applicant for admission commenced the study of law, to the extent that the application thereof was or would have been less restrictive or burdensome, shall determine the applicant's eligibility for admission to such examination.

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to creation of the new version of the Rules (effective May 18th, 2011). Thus, I don't really need additional 6 credits on my transcript as well other special courses for NY State Bar eligibility. That was another advising mistake that dramatically changed my education and tuition.

53. On November 29th, 2022, academic advisor Ellis Duncan wrote the following in the email in an attempt to create illusion that he advised correctly: *"Aleksei - I believe that I have done everything that I could have in order to provide you with the appropriate guidance on degree requirements, and worked with you along the way to ensure that you were able to complete both the LL.M. program and MBA program simultaneously, to make sure that you were able to register for all of the courses that you needed along the way, and to make sure that you would meet the requirements to complete the degree program and requirements for the New York bar. I have, as always, gone the extra mile here, and you seem quite unappreciative of my efforts. I'm afraid there is nothing else that I can do at this point, other than wish you the best in your studies going forward and in the remainder of your career."*

54. Other Georgetown Law students submitted their certificates through Georgetown Law without delay. Georgetown Law submitted something (or as they say a non-signed certificate about me) that contained mistakes with the purpose of hiding information and their wrongdoings. Such actions aimed misinformation about the facts. The forms of certificate of attendance are different for the years 2022 and 2023-2024. Georgetown Law was interested to conceal valuable information and to create a harm by holding for many months my transcript and certificate of attendance. It is clear that it is another example and episode of differential treatment and discrimination. I was treated differently because of my national origin. Dozens of requests were ignored (see the details in exhibits). Late submission of something (instead of my certificate) created huge problems (see exhibits). Therefore, this is a different treatment compared to other

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students. It is discrimination against me because of, *inter alia*, national origin and other grounds. Privacy rights were violated. Georgetown Law had communications about my issues with BOLE and there were problems with reference to Russia-Ukraine war and unreasonable actions (omission of action). Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

55. As you see from the exhibit when the transcript and certificate of attendance was requested for California Bar – Georgetown Law provided documents without delays for many months. The delays and problems with the transfer of my documents to New York Bar BOLE were because Georgetown Law made mistakes and decided to hide truth and relevant information. I can provide additional materials, explanations, clarifications in this respect.

Example C

56. On May 20th, 2023, Dasha N. delivered a commencement speech¹⁵. Initially she was invited as a solo speaker with the purpose of political support of the journalist (Evan Gershkovich). However, because of systematic dehumanization at Georgetown University of people with Russian national origin members of Georgetown University community and people outside of the community were not satisfied with the appearance of a 2nd sort person as their commencement speaker. Many people who signed the petition to disallow the speech and "cancel" Dasha are outsiders to Georgetown University community. Similar issues happened to many people with Russian roots, e.g. LGBTQ activist Masha (formerly Maria) Gessen conversation on free speech

¹⁵ <https://www.politico.com/news/2023/05/19/georgetown-invited-navalnys-kid-to-commencement-chaos-followed-00097954>

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in New York was canceled, it didn't even help that they were a critic of Donald Trump, and they were a journalist who theoretically must enjoy free speech rights as a special protected category. They were to resign from that free speech organization PEN America that canceled Masha. It was like the cancellation of opera diva Anna Netrebko from Met Opera scheduled work or wild incidents with satirist Mr. Shenderovich. Paraphrasing Mr. Shenderovich's opinion, it is about low-quality people with no achievements who try to create loud effects and cheap popularity through attacks on high quality people. Finally, Dasha's speech was diluted, and 2 additional speakers were invited. It was prohibited for graduated students to shake her hand and she didn't receive an honorary degree (like a 2nd sort human). Other commencement speakers and listeners at other Georgetown University (and SFS speakers before and after) were treated differently. As a dual degree MBA student, I knew other dual degree students at SFS, and it is wild that there were no students with Russian roots. Interestingly even special Georgetown University student Eastern European club had no people from Eastern Europe other than myself and a missing person from the territory of Ukraine, i.e. poor diversity at Georgetown University creates hate and inverted values. People guess on the quality of diplomats prepared by SFS for the Eastern Europe. Thus, I was forced to put on LinkedIn explanations of truth and reminder about declared values to the people because that was injustice to ban the speaker. Unfortunately, during the speech most guests were affected by misinformation, based on my observations most guests didn't stand up and/or applaud much Dasha after her speech (compared to other speakers at the commencement). Georgetown University didn't investigate obvious discrimination based on national origin because her ethnicity was the main reasons to cancel her, disrespect her speech, steal honorary degree, and disgrace in the form of a disallowed handshake like with 2nd sort human (like Jewish, Russian, Ukrainian, Roma, and other people in some views during WWII). Members of the Russian

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speaking community including myself suffered a lot in this respect. I don't understand why there were no sanctions for hate speech on Iryna Tiasko, Ruslana Kochmar, Ana Lejava, GU admin people, dean Helman, and professors who signed the petition. It is discrimination because of national origin. People with high intellect are against the war, e.g. 51 Nobel Laureates signed a letter¹⁶ to make ceasefire, based on their estimates the number of victims can grow up to 1 million by the end of this year. Based on the rationale, only the increase in military budgets is enough to solve the world hunger problem for almost a century. If we look at official UN data and projections¹⁷ in 1950 the population on the modern territory of Ukraine was 37 million people. There was an increase to 52.5 million until 1993 and a gradual decrease since then to 44 million in January 2022 (prior to the war). The decrease is because of awful policies of elites in Ukraine and because of emigration from the war and such elites. Based on UN projections in this research by 2100 the population of Ukraine will decrease to 15.3 million people (in the same Ukraine borders as in 1993). There are always solutions to make peace and agreements to prevent catastrophes, it is a matter of the willingness to negotiate. Moreover, there are always people who are responsible for wrongdoings at all sides including those who extract incremental cash flows and political scores from the wars. It is obvious that any war benefits only a few while the majority loses because this is a negative value with a huge opportunity cost. Interestingly even during the war the oil supply through the territory of Ukraine continues. The reasons for the extreme hate level are the actual Russophobia influences from Georgetown University professors for a long period of time, certain members of community, and agitators. Declared marketing Georgetown University values are not respected; policies do not work when there is harassment and

¹⁶ Letter addressed, *inter alia*, to His Holiness Pope Francis, His Holiness the Ecumenical Patriarch Bartholomew, His Holiness the Dalai Lama XIV, representatives of Islam and Judaism <https://novayagazeta.ru/articles/2024/07/13/not-to-kill-each-other-but-to-save-the-planet>

¹⁷ <https://population.un.org/wpp/Download/Standard/MostUsed/>

Alexei Klusov, CFA

Hayas have lessut values of equality respect for everyone. community in diversity and Cuta Personalis.

Iryna and Ana: few SFS students and outsiders signed a petition against Daslia because she (ri) is a daughter of Aleksi. N (ri) has no meritocratic achievements; and (ui) has a certain national origin. It is a hard period of time because free speech is restricted. it is even disallowed nowadays to wear a red tie. As you saw from Yuliyas' responses to other SFS post - Aleksi apologized for earlier words about Osetia & Crimea.

It hurts! like a stabber it that someone is passed as untrustworthy or undermanned.

A tragedy is that charismatic brave prisoner suffers while there are rumors that bad oligarchs influenced former team member to sign favorable letters. It was a mistake. Daslia was not involved.

I am naive but I wish I had at my communcations speakers who made red differences like Musk, Munger, Bezos, Bloomberg, Dalio, lawyers who created precedents; others who create value win-win solutions, inspire, and make the world a better place to live. Daslia deserves to speak.

Based on principle Ad Majorem Dei Gloriam there is a rhetorical question will banning the invited speaker better reveal God's active presence in our world?

Live (📺) Reply

So hypocritical of the SFS to give a platform to a russian whose dad did nothing but fight for power and support the imperial conquests of the Kremlin. As a Ukrainian student who is

graduating this year it makes me and all of other Ukrainian students as well as our families who are fighting for our freedom feel extremely disrespected by this institution

Like  Reply 

Ana Lejawa • 11

Juan Pastor I think the argument is that anti-Putin does mean anti-war. Navalny has had a record of being an ultra-ethnic nationalist using derogatory terms toward Caucasus, central Asian and Ukrainian people. He also supported the annexation of Crimea and the a

Like Reply

Juan Pastor • 11/1

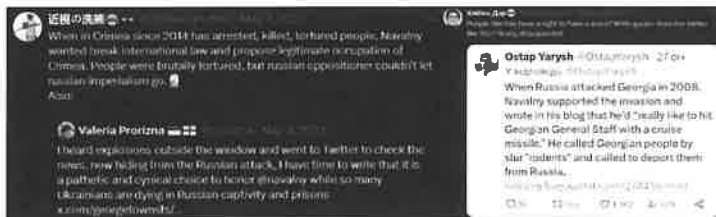
Ana Lejiva, thank you for sharing your knowledge and perspective. The insights of your post were exactly what I was hoping for -- learned something new! And yes unbelievable that Georgetown University could not find a more suitable speaker for this important occasion for all graduating students. Let's continue to raise voices for Ukraine and all the innocent people carrying the burden of this conflict. Best congrats on your graduation!

Page 3/4

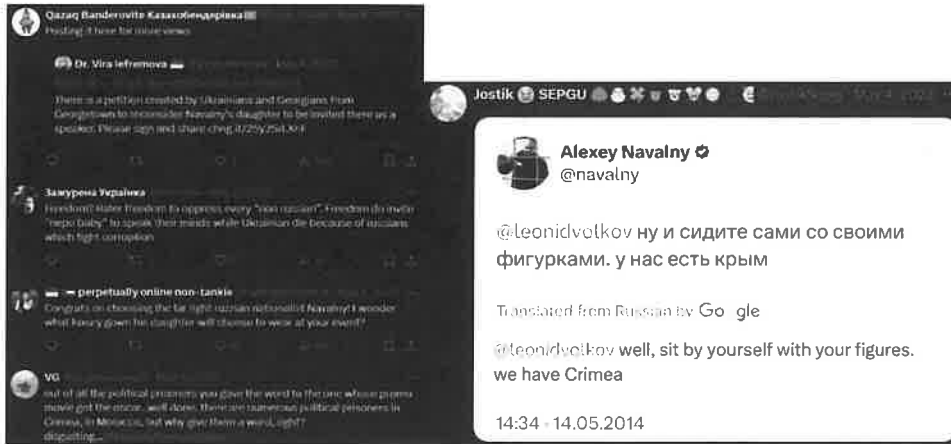
Some of you may know that a large body of graduating students are not happy that Dasha Nawalynya will speak at the commencement ceremony. We have signed a petition and are in conversation with the Dean. For context, we have nothing against Dasha and understand her struggle. However, we are concerned about the fact that her family has not openly opposed the war in Ukraine. Anti-F Putin does not mean Anti-war. However, if the school is committed to having Dasha speak to the graduating

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Martin Luther King



kitculka 57w
How can you prepare your students to "make the world safer" or "more peaceful" if you are inviting the person who is doing and believing in THE absolute reverse. And yes, I do mean Navalny. It is utterly disappointing to see an institution that calls itself "premier" to so blatantly fail to critically evaluate the speakers they are bribing for commencement.

salome_kom 57w
ua It is so unrespectable toward all Ukrainians and Georgian to invite Navalny's daughter to speak about human rights when Navalny was a person who supported the invasion of Georgia in 2008, who said that Crimea is a part of Russia and if he becomes a president will not consider returning this part to Ukraine. What is going on with you? If you really want to talk about human right and about the fight for freedom there are hundreds of Ukrainians prisoners in Russia who's family can talk about the Russian regime, for example azovstal's warriors family members. Why don't you consider inviting them????

dunaymaria 57w
Shame on you!
9 likes Reply

salome.mamuladze 57w
Giving voice to Navalnaya at the commencement means being tone-deaf to the struggles of the Ukrainians and Georgians in the face of invasions and war. Why would you disrespect and invalidate your students at their own graduation like this?

vovaabb 57w
I am in a disbelief! Blatant failure to invite the imperialistic fanatic Navalny to the event a bit safer world... shame on you
15 likes Reply

View all 2 replies

samarreads 57w
I don't see any Palestinians on the list even though 1000s are held in Israeli prisons without trial or charges and are being tortured and placed in solitary confinement for resisting Israel's colonialism.

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 alxkutovyi 57w
What a disgrace! White supremacist and Russian imperialist - seriously? How sick one has to be even to suggest that?

 tyler_kochman 56w
Not to say that there aren't Russian domestic positives to Navalny's resistance to Putin; but now is not the time to be giving a platform better deserved by those fighting for Ukraine. Navalny's imperialist past writing in many ways was a blueprint to what Putin used to justify claiming Ukraine as Russia's "rightful" domain. While this war is still going on, how about we instead platform Ukraine rather than someone who has a history of delegitimizing Ukrainian sovereignty?

 gloucesterbonsai 54w
There's a video of Navalny waving a gun in front of the camera and talking about deporting all the "non-russians". And that's just one of many things out there. No apologies have been made since because he's still a russian nationalist that the russian secret service picked as the new front for their "great new russia" without putin. The West is losing in the information war right now unfortunately if these "dashas" have an audience.

 leesapizzaa 57w
Who made this decision for sfs

2:06

LTE

twitter.com



naumenko @naumenkov · 12 ч.
Джордтаунський університет запросив на випускний доньку Олексія Навального. Під час її промови в знак протесту дві випускниці з України стояли спиною до трибуни.



58 508 8 254 145K



Ricky Nines
@RickardaRK900

В ответ @naumenkov

Орчиха рогульна, потвора роснява,
краще б виступала у батечка в тюрязі

22:20, 21 мар 22, 5 645 Прогноз

4 3



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Martin Luther King

58. As we see such statements are completely racists and are based on national origin. The behavior is dangerous for people with Russian origin as they are viewed aggressively as 2nd sort humans. In contrast to some other commencement honorary degree recipients at Georgetown University Dasha had not worked for mafia, and in substance had little chances to make evil in her life. For instance, Russian newspaper¹⁸ had contradictory observations about the commencement speech and 2nd sort human treatments without handshakes, extreme hate, and deprivation of rights to receive honorary degree (compared to other speakers at Georgetown University). Extreme hate language and shameful behavior of certain Georgetown University students (and professors – see below examples with RUSSIA SUCKS language and prohibition to speak) are not appropriate and not acceptable. It is clear that Russian students do not support war. This could be compared to the hate towards American people because of the wars, e.g. there are about 460,000 casualties as a result of the 2nd Iraq-American war, but it is clear that average American is not related to the horrible events that were happening there. There are always people who commit crimes from all sides of the conflict and derive monetary and political benefits (with real dividends). For instance, there are real consequences in the form of cash flows because of small wars happening in many places. Instead of support and help some people choose not to be open minded and select hate with evil. This is unlawful to discriminate based on national origin and other protected grounds. There were no investigations and no sanctions towards known students and unknown humble professors who signed the petition (if any). It is unclear who are all most of these people with hate speech on Campus and on internet (Facebook, Instagram, etc.) but it looks like organized campaign from groups of evil students and/or groups interested in discrimination and harassment (outsiders) who are not the members of the Georgetown University community.

¹⁸<https://meduza.io/feature/2023/05/21/dzhordzhtaunskiy-universitet-ssha-priglasil-daryu-navalnuy-na-tseremoniyu-vrucheniya-diplomov>

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59. Threats and slur language from students, professors, and even other commencement speaker are examples of dehumanization based on the national origin, i.e. not on the actions. This is an example of differential treatment based on shared ancestry and national origin. It is obvious that Jewish people are not responsible for the wars, same with Palestinians because they are not responsible for terrorist attacks. It is very disrespectful to see *"backs"* of some Ukrainian people at the commencement instead of their faces that could be open minded towards Russians. People suffered emotional distress and other consequences including medical. The campus environment was completely unsafe, it was dangerous. I can provide additional materials, explanations, and clarifications in this respect.

Example D

Threats from student to burn me like in tank in response to a festival WhatsApp video¹⁹.

60. Alexey Pustovit threatened to burn me, made inappropriate statements, offended with threats to defame with false conclusions, and made dishonest actions (see WhatsApp direct message example, one of the inappropriate actions from the western Ukrainian community). This is not a single incident. There are other incidents from some western Ukrainian activists that created unsafe dangerous environment on premises of Georgetown University. Such life-threatening direct messages were intentional commentaries because of my blood (national) origin. Hate language and threats to kill (burn like in tank) doesn't create safe campus perception. The new Ukraine is one of the largest European countries with many nations, people have different mentalities and languages, e.g. parts of Ukraine earlier were parts of eastern Slavic, western Slavic

¹⁹ https://www.youtube.com/watch?app=desktop&v=J_-r-qBB2CM&feature=youtu.be

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and non-Slavic countries (Austria, Hungary, etc.). Despite discrimination to use Russian dialect the majority of people on the territory of Eastern and central modern Ukraine feel ashamed but continue to use Russian as the home language. We observe it for non-western Ukrainians (and even Alexey Pustovit) in their immigration as well because of a period of from 40 years to 1,000 years of common history (depending on the part of Ukraine).



61. As a poor partner at Asters law firm (a large local law firm in Ukraine), he charges several times less than law firms in Eastern Europe (even less than a junior associate or a junior consultant (recent graduate) at CPA firms like BIG 4 firm). Prior to war it was like 2 hundred EUR for 1 hour of chargeable work for a partner. It is unclear where he received the money for LL.M tuition at Georgetown University and his lifestyle in DC. There is a lot of publicly available information about Ukrainian law firm Asters (his employer with a possible equity interest) involvement in possible corruption, including public accusations with the specific information available in different languages²⁰, including English and Slavic languages (Ukrainian, Russian,

²⁰ E.g. from the newspaper in Brussels neweurope.eu that works since 1993: *"...Rozhkova's main organized crime group associate is the co-partner of a law firm Alexey Didkovsky is a lawyer and co-managing partner of the Asters law firm. The media have already written that this*

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etc.). Everything depends on the quality of internal controls at Georgetown University with respect to the review of sources of tuition payments and contributions to the endowment (and other sponsorships). As a law firm partner at Asters, Alexey Pustovit was not an average employee who just collects antitrust permits from authorities and influences them to grant such permits. It is really possible that he received a portion of the firm profits from illegal activities to pay his LL.M tuition and other expenses.

62. I had a fear for my life, and it was dangerous to go to the campus, library, and events. Also, my reputation is good and clean, and I am an honest person. A part of my career contributed to the benefit of people, and I already had a chance to create a legacy (tax precedents) and make this world a better place to live. I am proud of my earlier achievements, they created a real difference and helped people. Such actions are inappropriate, dishonest.

63. This is not a single incident. Inappropriate activities from this and other students were happening in 2022 as well as in 2023. Even Yuri Gagarin have created a hate in Ukrainian students for unknown reasons. My numerous requests to meet and discuss the values and the threats with

firm provides legal services to the National Bank and is rewarded handsomely for its services. In 2019, Asters received 583 million hryvnias (€18.13 million) from the National Bank. The Ukrainian media speculated that what was included in the high fees for Didkovsky's lawyers were bribes that were then handed over to judges in exchange for favorable decisions. The press also assumed that the firm was involved in many dubious cases related to the embezzlement of budget funds. In particular, in a case involving PrivatBank, the largest commercial bank in Ukraine. Didkovsky was previously publicly accused of laundering large sums of money and having ties with NBU officials. The financial documents from the company show that for thirty-nine months (from January 2017 to March 2021), the payroll of Asters Law Firm was 808,318,747 hryvnias (€25.14 million) or more than 20 million hryvnias (€622,049) per month. In 2021, the sales of Asters law firm services amounted to 303,090,615 hryvnias (€9.42 million). This looks like a tax evasion scheme through the formation of a fictitious payroll and that the company operates as a conversion center. The evidence is further buoyed by the fact that the amount of dubious transactions, which the company took out of taxation for the last 40 months, now amounts to 386 million hryvnias (€12 million). Asters, in particular, spent 372 million hryvnias (€11.56 million) on financial documents as tax invoices from suppliers (mainly catering companies, wholesale of food products, construction, wholesale of office equipment, etc.). Most payment transactions are made through hryvnia accounts in Ukraine's Alfa-Bank and ProcreditBank. It is possible to confirm the use of Asters' JSC accounts through an official investigation by Ukraine's state authorities, possibly with the involvement of international experts in the field of money laundering. What should be noted, however, is that a well-known columnist/blogger, and a former Soviet intelligence officer, Yuri Shvets, openly accused Asters of having ties to Russia in November 2021. This accusation came from Shvets' own use of open and closed sources from the American intelligence services. This information is particularly damaging for Asters as it not only works for the state through Didkovsky, but the company's management works closely with Rozhkova. Asters is also registered in the United Kingdom as Asters Law Limited. A related party of Asters Law Limited – Matthew Spencer – the owner of Epam International Limited in London – acquired shares in the American company Global Partners LP, which then bought the debt obligations of Ukrzaliznytsia – Ukraine's state-owned railway company. Oksana Ilchenko, a long-time employee of Didkovsky, owns 20% of its shares. The remaining 80% is owned by Britain's Epam. Epam LLC, USREOU 37729756, is also registered in Ukraine and it turns out that the shares of Global Partners LP, and the debt obligations of Ukrzaliznytsia. These shares were indirectly acquired by Rozhkova and Didkovsky through front men. The movement of money through companies associated with the Rozhkova organized crime group allows us to conclude that the money stolen in Ukraine was partially placed in shares of unaffiliated individuals tied to Global Partners in the United States as part of the scheme through Asters and Epam International Limited, i.e. Matthew Spencer – for a total amount of \$314 million. Another \$15 million was placed in the Growth Credit Fund Inc. through the GML Capital scheme, or to be more specific: Stefan Pinter and Simon Milledge."

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the deans (including senior dean William Treanor) were ignored. Earlier I submitted a complaint to Diversity, Equity, and Inclusion office but no actions were taken. The goal was to ask Alexey Pustovit to offer his sincerest apologies for the inappropriate actions and to refute bad rumors. Bullying is not appropriate. He refused and neither IDEEA office nor Prof. Michael Frisch (or another investigator appointed after his impeachment) investigated violations of the Georgetown University policies, hate, harassment, and discrimination issues. That was not a single incident. Prof. Michael Frisch was impeached while serving as admin in the investigation because he was biased and was not interested in doing anything for more than a month to help with the threats, only cared about possible money laundering at Georgetown Law and the transfer to office to be in-person from the home. Moreover, the confidentiality requirements were not satisfied and there was a breach of duties at Georgetown University. My life was under threat.

64. Prof. Michael Frisch didn't investigate the sources for tuition money transfer and luxury life in DC. He messed up everything and was not aware that there were no classes with Alexey Pustovit. In the opinion of Prof. Michael Frisch threats to burn like in tank (in response to festival): *"The alleged discrimination and harassment involves an online discussion of the current situation between Russia and Ukraine. The purported harassment appears to be no more than a spirited discussion about highly charged current events."*

65. Issues were not investigated by the Diversity and Inclusion office (now IDEEA), assigned investigator Michael Frisch and Mitchell C. Bailin (after the impeachment of Michael Frisch) did nothing. Mitchell C. Bailin completely disappeared as well as IDEEA office. The remarks of investigator Michael Frisch about different opinions inside the team were incorrect because we had no team with this Pustovit. He was not willing to do his job and only was concerned with the possible money laundering because of weak internal controls and the need to travel to the

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Georgetown Law office. There was ignorance to threats to my life. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

66. Such behavior towards innocent student is a result of hyperbolic and hysterical demonization of Russia and Israel. It led to a global outbreak of violence, vandalism, and vitriol. I can provide additional materials, explanations, and clarifications in this respect.

Example E

Systematic bullying and harassment. Prohibition to wear a tie with national color (for a millennium for Slavic people red color is #1 choice because from etymology it means beautiful). Threats of boycott, systematic bullying, discrimination on different grounds.

67. Student Devvrath Arora made several times inappropriate hate and discriminatory statements and dishonest actions during our team participation in the Georgetown Law course LAW 058 International Tax & Business Planning Workshop, e.g. intentional commentaries about my national origin, beliefs, opinions, the workload, others. Since his participation in the deliverables and contribution was poor, he missed many team meetings, soke on my and other slides systematically as not being able to prepare, while being in the meetings online and in person he was doing other things (or went out from laptop during online meeting so we were not able to find him). Since he was raised in a society with certain values and beliefs (caste system with brahmins, kshatriya, and slaves; cheat and racist legacy in some bad Indian communities) he allowed inappropriate commentaries about the workload (like laughing in front of others with a request to me to not to work hard), beliefs, red ties, opinions, and threatened a boycott. It

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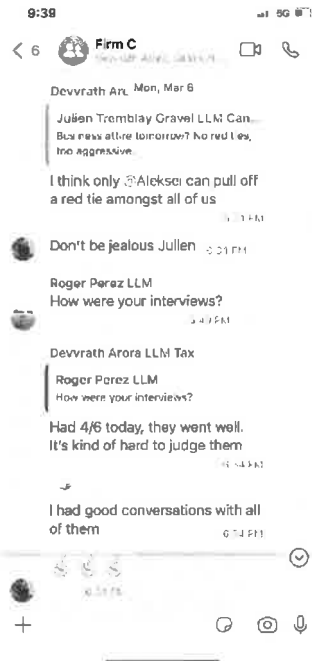
Martin Luther King

compromises integrity and destroys the trust in the team. He apologized earlier but not sincerely. He refused to meet and discuss in a civilized manner. Earlier I submitted a complaint to IDEAA office with the goal to ask Devvrath to offer his sincerest apologies for the inappropriate actions and to refute bad rumors. Bullying is not appropriate and there are elements of cheating to avoid teamwork. The purpose of his actions was to cause harm and to discriminate on national origin and other grounds. We were already the best-performing team on this course based on grades (competing with another best-performing group with slightly lower grades) and the reasons for inappropriate actions are unexplained (other than discrimination and bullying based on national origin and political beliefs). There are no rational explanations and/or motives for inappropriate behavior. Also, he disallowed wearing a red tie as being too aggressive based on his political beliefs (based on his statements and questions about Trump). To make it clear, I am far away from politics and do not understand why there is a propaganda from deans and professors about politics, why there is censorship for the questions to guests (either they are not able to answer questions or deans think that they are not able). It takes time to create opinions and implement reasonable judgement based on critical thinking, analysis, and facts. One of my MBA classmates explained that he voted for Trump because he is not a part of bureaucratic elites and makes changes. Based on my observations MBA students generally have good education and/or achievements with a track record. Bullying of people based on the color of ties either because of Russian national origin with an additional hate towards Mr. Trump is absolutely crazy and must not be supported by Georgetown University. People with national color ties (even if it is a red color) must not be bullied and treated as 2nd class people. Moreover, there were threats of boycott, ongoing bullying, e.g. when we met on campus in the presence of others he cried: *Aleksei, don't work so hard...* Such

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bullying based on work commitment is crazy. I have A grade from this number one (the best rated) course at Georgetown Law.



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68. It is clear from the picture that there are only 2 graduate students with ties. I had a fear to wear my tie in national color. I was deprived of the right to wear a tie in a national color. I was treated differently, bullied, harassed, and had a fear to wear national color tie.

69. Earlier such evil student refused to meet and discuss the issues to resolve them (while initially we agreed to meet). Inappropriate activities happened during the course repeatedly in February, March, and April 2023 (last time on Tuesday, April 25th, 2023).

70. Issues were not investigated by the Diversity and Inclusion office (now IDEAA), assigned investigator Michael Frisch and Mitchell C. Bailin (after the impeachment of Michael Frisch) did nothing. Mitchell C. Bailin completely disappeared as well as IDEEA office with a reference from Olabisi "Bisi" Okubadejo (her supervisor is Rosemary Kilkenny) that this is not their job because based on internal rules Georgetown Law deals internally. The remarks of investigator Michael Frisch about different opinions inside the team were incorrect because we had the "team charter" (internal signed documents with the rules for the team) and all the slides and submissions were agreed and approved in our team. He was not willing to do his job and only was concerned with possible money laundering because of weak internal controls and the need to travel to the office while he could do Zoom instead.

71. It is common for some students with Indian origin who were raised in racist corrupt communities to show discrimination and inappropriate behavior. People are different, some students with Indian origin are wonderfully educated and civilized while others are not... Unfortunately, numerous deans both at MBA and LL.M programs with Indian origin didn't educate and explain the values to student members. The administrator Michael Frisch was informed about examples, e.g. at that time an Indian origin student Sai Varshith Kandula with a nazi flag tried to

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seize the powers at the White House and create dictatorship²¹. Later on, he pleaded guilty and decreased the maximum possible sentence for the unlawful attempt to seize the US power²². It is common for people in the US and England (historic origin of 2 highest Indian casts) to treat others worse than their pet dogs (see examples²³²⁴). There is actually a common rule of caste discrimination in India. And some people try to bring such awful policies to the school. Lower casts²⁵ are not treated as people, there are real examples of no consequences for killing low caste people, low caste 2nd sort people don't receive actual protection, though are declared formally equal. Everything depends on people, their level of education, and other factors. For instance, at the MBA program we had about 50 students with Indian roots (out of 250 full MBA students in 4 cohorts) and most of them had good educations and culture.

72. On March 7th, 2023, I had to send the following email to attorney teaching assistant varuni.balasubramaniam@bakermckenzie.com (she helped our two attorney professors to manage group weekly tasks and presentations from team members regularly):

"Hi Varuni,

*Our team members ask about the policy for tomorrow. Specifically, for unknown reasons, a couple of team members are interested to know **whether red ties are disallowed**.*

²¹ <https://nypost.com/2023/05/30/white-house-u-haul-suspect-sai-kandulas-court-date-delayed/amp/>

²² <https://www.courthousecnews.com/nazi-flag-bearing-man-who-crashed-a-truck-into-barriers-near-the-white-house-pleads-guilty-to-felony/>

²³ <https://timesofindia.indiatimes.com/world/europe/hindujas-spent-more-on-pet-dog-than-they-paid-a-help-swiss-prosecutor/articleshow/111067559.cms>

²⁴ <https://www.ndtv.com/indians-abroad/uks-hinduja-family-prakash-hinduja-ajay-hinduja-geneva-billionaire-hinduja-family-accused-of-exploiting-staff-at-swiss-villa-report-5915321>

²⁵ <https://www.analystnews.org/posts/for-some-indian-women-caste-is-still-a-matter-of-life-and-death>

<https://www.nationalgeographic.com/pages/article/indias-untouchables-face-violence-discrimination>

<https://www.reuters.com/article/world/indias-low-caste-women-raped-to-keep-them-in-their-place-idUSKBN28509I/>

<https://www.hrw.org/reports/pdfs/g/general/caste0801.pdf>

<https://www.prospectmagazine.co.uk/politics/46922/indias-shame>

<https://thewire.in/caste/sexual-harassment-case-two-murders-mysterious-death-sagar>

https://chrismith.house.gov/uploadedfiles/2005.10.06_indias_unfinished_agenda_-_equality_and_justice_for_200_million_victims_of_the_caste_system.pdf

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Also, we have a mistake in the submission.

I would like to clarify one of the issues. Today there was another mistake in the submission. As before, a couple of slides were unavailable (missing from team members) until the last minute and we have been forced to email our submission as usual in a rush with typos and mistakes. We maintain statistics on everything in our team. For this assignment, my portion of the presentation (5 slides) was emailed several times internally, and unexpectedly it was changed despite the agreement on how we outline several critical areas and our joint work in making such changes. It was made behind the back during the last 5 minutes before the submission. It was not approved by the team and changed the meaning of several bullet points in the slide deck.

For the avoidance of any doubts and concerns, we do not provide an opinion on what is good and what is bad, what is yellow and what is dark. We do not judge Pillar I but show the implications. We provided answers to questions about the impact of several Amount A items on business lines. Our presentation addresses identified problems and humble attempts to mention possible solutions. It is critical to maintain neutrality in communication with officials, especially at such a senior level as in our assignment. Moreover, some advising could be recognized as lobbying activity...

Our team must be professional, and we are not for or against Pillar I. It was not even discussed as a team decision, we had no votes, and didn't provide dissent, majority opinion, or minority opinion. It is out of scope, and it is related solely to private views. We have genuinely international routes and are far away from the politics in the US.

In detail:

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(i) The following 2 bullet points...

- *"Or a natural evolution of tax systems and treaties?" (meaning: a possible scenario for existing systems and a solution (see the previous bullet point)*
- *"Countries have opposing interests and effectively compete for tax revenues" (statement of fact)*

...surprisingly transformed to 1 bullet point with a dramatically different meaning:

- *"Alternative is a natural evolution of tax systems and treaties: countries have opposing interests and should be allowed to compete for tax revenues" (now it is an explanation that it is because interests are opposing and an opinion that countries must have rights to compete for tax revenues – much narrow idea and a questionable statement)*

(ii) Same with a disappeared RULE OF LAW item. It completely changes the meaning.

In the attached file in red ovals, you can see what was unexpectedly changed in substance. In green ovals are the points that we agreed to change.

Ethics and professionalism are extremely important in the legal world. Lawyers must never behave like they compromise integrity. For instance, judges make unbiased decisions disregarding personal beliefs and biases based on the principle "Sine ira et studio" ... This is the reason why Femida (an allegorical personification of the moral force in judicial systems) is blindfold. Closed eyes represent impartiality, the ideal that justice should be applied without regard to wealth, power, or other status.

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The study is an opportunity to learn and grow. Everyone makes mistakes. It is better to learn from the mistakes, keep them small, and minimize adverse implications.

Earlier the professors explained that Gray and Blue colors of Georgetown University represent different views of community members participated in the civil war and to express "the feeling of unity that exists between the Northern and Southern boys of the College". Despite having different views and beliefs community members respected Georgetown University.

For centuries attorneys at law firms rarely worked in teams. The concepts of synergy and Win-Win cooperation were not understood well. But everything changes because of increasing complexity, a necessity in diverse backgrounds and different skills, and international cooperation with colleagues. Nowadays successful lawyers cooperate well. Team members must cooperate in an honest manner and be trustworthy.

Thus, I strongly believe that the students in the law firms in our course must comply with the best standards and respect the ethical requirements of the profession.

I understand that everyone is very busy. We have a lot of everything going on... It takes sometimes a lot of time to understand what is required and to do something new outside of a comfort zone. Therefore, it is critical to comply with Ethical standards and be professional, contribute to the team's performance on a best-efforts basis, and not compromise integrity.

Sorry for the inconvenience but our team has a mistake in submission, a question, and an issue... We must have transparency and fair dealing in all aspects. The purpose of this email (which is

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only a part of the course team C confidential communication) is to prevent mistakes and other issues in the future. ..."

Later I explained the meaning and translation of the national red color in Eastern Slavic cultures. I can provide additional materials, explanations, and clarifications in this respect. As I understand it the wording jealous appeared after Varuni had meetings with Devvrath Arora and Julien Temblay-Gravel, i.e. they discussed who is jealous and why (assumption).

Example F

Inappropriate statements and life-threatening threats. Insulting language and actions.

73. During the Spring Semester 2023 graduate foreign student Julien Temblay-Gravel deleted several times the finalized slides from the group deliverables (while submitting projects to the teaching assistant (TA) for Georgetown Law course LAW 058 International Tax & Business Planning Workshop and made inappropriate statements, e.g. "I will delete your shit" (in the context of the prepared slides for the submission). Behavior is dishonest and discriminatory, and it compromises integrity and breaks trust. I submitted the complaint to IDEEA office but there were no results because it was transferred to Georgetown Law. The goal was to ask Julien to offer his sincerest apologies for the inappropriate actions and to refute bad rumors. The purpose of his actions was to make harm, discriminate, and make misrepresentations in connection with Georgetown Law assignments when we were presenting the deliverables at the office of a well-known law firm with external guests (with a view of the white house).

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74. We were already the best-performing team on this course (competing with another best-performing group) and the reasons for inappropriate actions are related to the willingness to speak all the time and not to show other team members work, i.e. highly individualistic and egocentric behavior with certain discrimination based on national origin and political beliefs. There are no rational explanations and motives for inappropriate Julien's behavior other than dishonesty, bullying, and discrimination.

75. Also, he disallowed wearing a red tie as being too aggressive based on his political beliefs. That was based on my national origin (Russian and Jewish roots) because red color is a number one choice and is considered a national color for many centuries or even more.

76. For example, on March 6th we had a meeting in the Hotung building (3rd floor) and finalized together the content of the slides. For my portion we made it on my laptop and at 4:50 pm I emailed the slides to Julien for incorporation in the slide deck with the following note: "I corrected the formatting and other issues that appeared surprisingly on my slides.". At 5 pm Julien emailed the slide deck to TA. Later on I realized that there were intentional unauthorized changes (deleted "RULE OF LAW" from the slide and changed the meaning of 2 bullet points).



77. Therefore, I had to email teaching assistant Varuni early morning on March 7 about unauthorized changes and identify them on the slides. Later we submitted a corrected version. After that, we had a one-on-one meeting where he promised to stop inappropriate activities and

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explained that earlier sharing of his slides with the team 1-2 hours prior to submission was caused by his internal perfectionism reasons, i.e. he wanted to finalize them to the maximum possible extent prior to sharing.

78. Despite that, he made inappropriate changes again on April 3rd (another joint submission). I emailed another team member for consolidation early morning at 12:52 am my slides for question 4 (we jointly worked on question 4 with Julien: he was dealing with the virtual CPM/TNMM numbers for the tax purposes between \$20M and \$500M and I was answering a question about suitability of a special RPSM method for transfer pricing). I completed the slides and left them in the appropriate section of the presentation. We agreed that Lily in the morning will combine the prepared slides from team members and promised to incorporate my slides and make a header to one of them and correct typos if there are mistakes. Work was performed on Google slides and it was revealed that all my slides with 10 thesis statements and appendices were moved by Julien to the appendix (earlier they were in the slide deck). But it was a part of the answer to question 4 (we worked together on different parts of this question with Julien). This portion of work is important because it illustrates the problems that are faced by taxpayers, e.g. Coca-Cola lost already several billion dollars and disclosed in financial statements that the total amount of additional taxes with respect to this issue could be 13 billion dollars (the largest TP case so far). It was made specifically and only by Julien intentionally and inappropriately (he joined the editing process to remove my slides while it was not expected based on the teams' agreement that he will do any combining), without discussion and cooperation (like earlier "I will delete your shit"), and it is another example of dishonesty, compromised integrity and trustworthiness, inappropriate willingness to speak and present all the time during meetings with external professionals, to discriminate a team member and disallow to speak. Fortunately, I was able to

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email later the correct version. Inappropriate activities happened during the course repeatedly in February, March, and April 2023.

79. Issues were not investigated by the Diversity and Inclusion office (now IDEEA), assigned investigator Michael Frisch and Mitchell C. Bailin (after the impeachment of Michael Frisch) did nothing. Mitchell C. Bailin completely disappeared as well as IDEEA office. The remarks of investigator Michael Frisch about different opinions inside the team were incorrect because we had a team charter and all the slides and submissions were agreed and approved in our team. He was not willing to do his job and only was concerned with the possible money laundering because of weak internal controls and the need to travel to office. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

80. Pursuant to the internal "team charter" (see exhibit) our team had consensus on all submit files and presentations. Moreover, based on the team charter all conflicts and disagreements were resolved inside the team based on specially develop and updated charter. i.e. we had agreed final team submissions but it was different for a submission when 2 teams worked together on one project – we selected a team member to submit and make minor edits – the video is available on google slides where Julien was intruder and deleted slides with malice, while that was not his assignment. but apologies from Julien and Devvrath were not sincerest. There was no disagreement on any submission because otherwise (without the agreement) there is no submission. The conclusions of administrator Michael Frisch were not based on the facts and governing documents ("team charter"), he did nothing to investigate the issues and prevent discrimination while it was possible to receive sincerest apologies. The amendment after the submission was a breach of the "team charter", i.e. our internal team rule. Discrimination and differential treatments are related to

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national origin and other grounds. It is clear that hostile environment and harassment exists when someone deletes information after the submission or threats to "delete your shit" in context of slides. This is the discrimination based on national origin and other grounds. I can provide additional materials, explanations, and clarifications in this respect.

Example G

No meetings with official representatives of Georgetown Law for a half-year period despite the urgent requests and threats to my life and career. Indifference and non-willingness to resolve the issues and to listen to the problems.

81. For instance, I emailed on the following dates the requests to meet regarding many issues (discrimination, mistakes, misinformation, threats to my life and values, correction of errors, others): 1/12/2023, 1/18/2023, 1/19/2023, 2/14/2023, 3/13/2023, 3/16/2023, 3/29/2023, 3/30/2023, 3/31/2023. Then I requested numerous times in April and May to receive an update on the status of the issues, to meet, and move forward to solve problems because the issues were continuing. At the same time there were meetings with other students to resolve the issues. There are no reasons to ignore problems and threats to my life (like burn in tank threat and others issues including systematic discrimination). Despite that and clear violations and mistakes it was rejected to meet, solve the problems. It was easier for Georgetown Law to run from them. Only earlier I had a chance

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to have a quick meeting in a very disrespectful manner with dean Madhavi Sunder²⁶ during the break one day prior to exams and a meeting with dean Tiffany Joly. Both meetings were cut quickly (only part of the issues were listened).

82. Specifically, it was impossible to meet with numerous deans including senior dean William Treanor, dean Tiffany Joly, dean Madhavi Sunder, and others. At the same time other students were able to meet with the deans and discuss issues for many hours from the problem with the organization of graduation Gala event (students from year to year are not able to get tickets for their own graduation) to other issues with harmful for Afro-American students Twitter messages at Georgetown Law²⁷. For instance, for many hours senior dean William Treanor listened for hours (or made an impression of doing so...) and assured students that he was "appalled" by the "painful" nature of Shapiro's tweets and promising to "listen," "learn" and ultimately "do better." As you see promises were empty because discrimination and differential treatment continued after that with respect to students with Jewish, Russian, and Asian roots. As you see this is again discrimination and differential treatment based on national origin and shared ancestry. Hypocrisy is a special talent of senior dean William Treanor, for instance there was a bitter taste left and even no buy-buy words to the community after his activities at Fordham Law where he destroyed value (the ranking dropped from 25 to 30)²⁸. Similar damage to the Georgetown Law was created by his efforts because of numerous scandals with discrimination and again drop in ratings²⁹ that was answered by the exit from competition³⁰ at all with a reference to wrong values

²⁶ When short meeting finally took place, it 1 day prior my exam (with early cut of). They forced me to join via Zoom from the library on December 5. Subsequently, there were no further meetings for over half a year until the graduation ceremony where dean laughed at me.

²⁷ <https://www.nationalreview.com/corner/georgetown-law-students-stage-sit-in-demand-dean-fire-ilya-shapiro/>

²⁸ <https://abovethelaw.com/2010/06/fordham-students-left-with-bitter-taste-in-their-mouths-after-dean-treanors-departure-for-georgetown/>

²⁹ <https://www.lawweekly.org/april-fools/2022/3/31/georgetown-bribes-way-back-into-t14>

³⁰ <https://thehoya.com/news/campus-news/georgetown-law-withdraws-from-u-s-news-rankings/#~:text=Georgetown%20Law%20Dean%20William%20Treanor,holistic%20evaluation%20and%20public%20service.>

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and a priority to focus on public service. That was again not truthful excuse because based on available statistics only a couple students join IRS each (out of more than 2,000 students as Georgetown Law is the largest law school in the U.S.). Also, my emails in 2023 and 2024 to meet and look at the violations to the board of directors of Georgetown University³¹ (through secretaries and assistants Marie Mattson and Liz Bartlett), the President, and temporary executive – provost of GU were not answered. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. I can provide additional materials and clarifications in this respect.

Example H

While it was allowed to others it was prohibited initially (until I discussed with the deans) to transfer to Executive LL.M in Taxation because of extraordinary circumstances and incorrect academic advising program. It is a differential treatment.

83. On November 29th, 2022, academic advisor Ellis Duncan wrote the following in the email in an attempt to create illusion that he advised correctly: *“Transfers between the on-campus and online Executive Tax LL.M. program: Typically, when a student wishes to transfer from one LL.M. program to another one, the respective program directors for those programs confer and decide whether to permit the student's request. In this case, because I am the director of each program, my decision is not arbitrary, but generally based on two factors (in the case of a request to transfer from the on campus to the online program): (1) whether a student has a compelling*

³¹ <https://governance.georgetown.edu/board-of-directors/>

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need to take classes online and cannot complete those courses on campus and (2) the number of credits a student has taken on campus vs. total number of credits needed for the degree. If a student has demonstrated a compelling need (which you have not, since you are registered for all on campus this semester and next semester), I will still consider that request as long as the student is less than halfway through the on campus program. If they have completed more than half of their program in one modality (on campus or online), I deny those requests - the reason being that it does not make sense to confer an online degree to a student who has completed substantially all of their credits on campus (or vice versa). Because you have, to date, taken more than half of your classes on campus, your request to transfer into the Executive LL.M. program was denied. Dean Sunder has agreed that I exercised reasonable judgment in your case because you have completed the vast majority of your program on campus. So your appeal of my decision has been denied.

Finally, for your information, you are not eligible to sit for the New York bar if you obtain the Executive LL.M. in Taxation degree, which is an online program. Please refer to Rule 520.6 from the New York Court of Appeals Website ([here](#)). The text, in relevant part, states:

(viii) No credit shall be allowed for correspondence courses, on-line courses, courses offered on DVD or other media, or other distance learning courses.

84. However, later tax Program Director Ellis Duncan ate his words, he and the deans confirmed that I can switch the program. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

Example I

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Professor Rachel Wellhausen during the MBA course Business & Policy in Global Economy inappropriately used RUSSIA SUCKS language, violated freedom of speech rights. My appeal for the grade was declined improperly and discrimination is clear. It was not allowed to resubmit assignments while others resubmitted and received higher than initial grades. There was a bias. There was differential treatment.

85. Other students had rights to appeal while I had no rights while the professor disallowed to exercise freedom of speech rights and used negative Russia SUCKS language.

86. This is direct quotation from dean Kerry Pace email dated July 1st, 2022, in response to appeal: *"Regarding your grade appeal for STRT 560, while I acknowledge that a professor making statements such as "Russia sucks" is offensive and inappropriate (note that this issue is being addressed separately), I see no indication of an error in grading procedures or not following policies on the syllabus. Additionally, a grade appeal is not the appropriate place to communicate your disappointment with Professor Wellhausen's teaching style (again, know that we are looking into these concerns; it is unclear if she will be returning to McDonough next year."* Neither of the deans Kerry Pace and Prashant Malaviya took any actions to investigate or do something with the discriminations, targeting, and harassment.

87. My classmates asked me how I feel about the inappropriate behavior of Rachel Wellhausen and rude commentaries about my national origin and my country of birth.

88. Other students didn't receive rude sexual (or non-sexual) SUCKS language with respect to their country of national origin and were not deprived of educational opportunities, i.e. there was no prohibition to speak and express opinions, no bias and hate. Other students are able to

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appeal grades so there is unbiased review. It was not allowed to speak in this course for many classes because of the fear and commentaries, and it is another example of deprivation of rights. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. I can provide additional materials, explanations, and clarifications in this respect.

Example J

Because of discrimination my appeal for the MBA course OPIM 571 Environmentally Sustainable Operations and Business Models was not reviewed. Because of another Georgetown Law mistake with payment transfer they asked either to withdraw from the course "Corporate Income Tax Law I" or to pay immediately. While that was their mistake I was forced to withdraw and join OPIM 571 course that was in audit mode earlier. I was treated differently, and my appeal was improperly rejected. There is discrimination because other students can appeal and I cannot.

89. My appeal had both valid grounds: (i) an error in grading procedures; and (ii) inequity in the application of policies stated in the course syllabus.

90. Standards and expectations were applied differently to me compared to other students. I needed a fair and unbiased assessment of each 3 elements of my grade (participation, individual cases, group project). I have a right to fair treatment with no inequity in the application of policies. My performance for this course is compared to the performance of other MBA students with the principle of 3.5 maximum mean policy. Thus, all the elements (participation, cases submission,

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project deliverables) are measured compared to other students. Therefore, an independent review by the committee must have created a solution and remove violations of my rights (errors in grading and inequity in the application of policies stated in the syllabus).

91. It is clear that because of mistakes (or unknown issues) with the registration for the course "Corporate Income Tax Law I" and changes from audit mode for OPIM 571 to full registration mode (without access to Canvas for unknown reasons) I was in a different position (compared to other students). The length of the course and the number of assignments were different. Thus, I was treated differently compared to other students. There was inequity in the application of policies stated in the syllabus for all 3 components of grading. In violation of the syllabus policy there was no information posted on Canvas with the statistics and distribution of grades, grades for participation, and projects. As was outlined in my appeal there are obvious errors in grading for the participation section. People not visiting the classes and/or keeping silent were treated better.

92. Some people didn't like that I explained issues with child labor in cobalt mining that is used in battery (accumulators) production. But this is the truth. Other students are able to appeal grades so there is unbiased review... I was differently situated. Since I joined in full mode this course later (after withdrawal) there was a different treatment and number of submission. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

93. I can provide additional materials, explanations, and clarifications in this respect.

Example K

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Martin Luther King

Systematic mistakes and misinformation regarding the enrolments in courses that are not eligible and not required. Mistakes with loans were not corrected. Delays in processing payment for more than 4 months. Inappropriate charges including Georgetown University collections for health insurance while I had insurance coverage.

94. During the Fall 2022 because of misinformation and incorrect academic advising incorrect courses were selected, for instance, Advanced Legal and Scholarly Writing course was not applicable because I must had enrolment in seminar type course while I had no seminar course. I.e. I was not enrolled in a seminar course with a paper as a project to complete. Without such requirement it is prohibited to enroll in the course. I had to withdraw from the course because I had no seminar course and I didn't find a professor at Georgetown University who has expert opinion to create and publish a paper regarding a sophisticated issue and my precedent (tax case). Other students didn't suffer from mistakes related to incorrect advising. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

95. Similar mistakes were with other courses like Introduction to Contracts that was irrelevant and a prohibition to enroll in the Evidence course. Other students had no prohibitions to enroll in the Evidence course. I had to take this course later in the Spring Semester.

Moreover, in the Summer 2021 I was mistakenly enrolled in 3 Georgetown Law courses (6 credits total) while pursuant to section 520.6 (b) of the Rules of the Court of Appeals for the

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Admission of Attorneys and Counselors at Law to be eligible for New York Bar examination the maximum number of Summer courses is 2 (4 credits maximum). Then Georgetown Law added 2 more Summer courses (4 credits) in the Summer 2022 Semester. Therefore, there were extra unnecessary 6 credits (almost 18 thousand USD in tuition) that are not required and excessive for New York Bar, i.e. not accounted for the purposes of admission making the total requirement of 30 credits (instead of 24 as for other students). Instead, I had rights to either audit these courses or take them as a part of MBA program (13 credits outside of business school are included in tuition). Other students didn't suffer from advising mistakes and misinformation. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

96. There were mistakes and unknown charges on my account and utilization of loans for the Summer 2021 period (differences were never explained). There were unexplained delays in processing payments that affected my study, I was forced to not to visit several classes in the Summer 2021 for 4 courses (9 credits): Tax practice and procedures (admin pract), Private Equity and Hedge Funds: Taxation and Transactions, Impact of Globalization of Real Estate, Taxation of Intellectual property (see emails to professors with explanations that GU admins do not process payments). Other students had no mistakes and issues with delayed processing of payments. This is differential treatment because of national origin and other grounds. I was forced to stop studying in the Summer Semester due to deprivation from education opportunities. E.g., see a direct quotation from email to prof. Dietmar Georg:

"Starting from this Thursday (7/1) I am not visiting the classes and have no participation in the courses until all the bill related issues are resolved. 75+ days ago the process was started. I do not know if there is any plan and/or a timeline to process it, i.e. to resolve the issue. As of

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today, I do not understand when it will happen. But immediately after the processing I will join back. I have some knowledge of finance and had a chance to see several transactions during my career. Hopefully it will not affect anything.

Historical observations of how everything worked out previously.

In January 2021 I started my additional LL.M. in Taxation study at Georgetown Law and on January 24th it appeared on the bill. Finally, all the issues were resolved on March 5th and the loan with a scholarship was processed. Thus, historically it was about 2 months to do everything...

For this Summer Semester I have courses at Georgetown Law, Georgetown University, and MSB. Everything is within Georgetown University. On April 15th the process started (it appeared on the bill) but 2+ months later it is far away from finalization."

97. Same with the higher charges for the Federal Income Tax course compared to other students in the Spring 2021 because I was billed a higher LL.M fee for a lower fee JD course. Technically the admins of Georgetown Law explained that it is impossible to enroll in the JD course because I am in the LL.M program. However, they violated their internal instructions, this is another example of a mistake (see below the *void ab initio* course enrollment with more details) with the purposes to enrich because of the higher net tuition. This is a differential treatment compared to others based on national origin or other grounds.

98. The health insurance charges might represent unlawful activities because I had simultaneously several eligible insurance and Georgetown University automatically collects the

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fees without authorization. GU didn't remove their special "mandatory" United Healthcare insurance for most Semesters while such service (product) was unnecessary because I already had sufficient insurance coverage. There are special relations between Georgetown University and United Healthcare service provider. Thus, there are not approved by me and inappropriate charges on loans with respect to such health insurance sold by GU.

99. When I had a study abroad at LBS (MBA Exchange at London Business School) there were delays in processing payments and misinformation. It affected the visa issue since I created delays in visa application, and I didn't receive an educational visa invitation. Instead it was explained that I need to receive a regular visa that was not provided for many months making it impossible to travel to study. Later when there was a need to provide additional documents for travel both MSB and LBS refused to do so. All other students enjoyed in-person studies (both in DC and abroad). Other students who didn't travel before because of pandemic postponed graduation to study abroad additional semester with a physical at the foreign university to enjoy access to the campus and other facilities, professors, other students, and other vital services, i.e. they didn't suffer with online study in UK time zone. I didn't receive the services I paid for because of discrimination and forced 3rd vaccination during the exam week. I can provide additional materials, explanations, and clarifications in this respect.

Example L

Misinformation about the rules and the policy at Georgetown Law.

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100. Registrar's Office and Georgetown Law academic advisor (tax program director Ellis Duncan) enrolled me in the Basic Principles of Finance course in violation of internal policies, i.e. in my 3rd Semester and not in my 1st. Direct quotation from the Student Handbook of Academic policies (in force in 2020-2021) (page 51 of the document). Direct quotation: LL.M. in Taxation: *"In addition to the general requirements, foreign-educated students must complete 20 credits, including a minimum of 16 "specialization credits" in courses listed under Taxation in the Curriculum Guide. As part of the required 16 specialization credits, students must complete the following three courses: (1) Federal Income Taxation; (2) Corporate Income Tax Law I or Corporate Taxation; and (3) Basic Principles of Finance (an online course that must be completed in a student's first semester in residence)."* During the Fall Semester of 2022 I must had a record of study abroad based on instructions emailed to the Registrar's office at Georgetown Law. However, Georgetown Law didn't record study abroad and me enrolled in the course Basic Principles of Finance incorrectly, it is critical for the bar exam eligibility and created huge hardships and delays for me. There should be a record that I had no study period in Fall 2021 Semester on my LL.M in Taxation transcript. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. I can provide additional materials, explanations, and clarifications in this respect.

Example M

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Misinformation about the rules and the policy at Georgetown Law to enroll me in the low-quality course. Deprivation of the right to receive high quality educational services from a recommended experienced professor.

101. There was a mistake with the enrollment in the Federal Income Tax course in my 1st Semester (instead of the second Semester of studies). I fulfilled the requirement to waive the course but it was not waived. Other students had opportunity to finish the special online course while I was deprived from such opportunity despite my requests. Because of this I missed opportunities to take other good courses that were no longer offered at GU after 2021.

102. Direct quotation from the Student Handbook of Academic policies (in force in 2020-2021) (page 51 of the document). Direct quotation: LL.M. in Taxation: *"In addition to the general requirements, foreign-educated students must complete 20 credits, including a minimum of 16 "specialization credits" in courses listed under Taxation in the Curriculum Guide. As part of the required 16 specialization credits, students must complete the following three courses: (1) Federal Income Taxation; (2) Corporate Income Tax Law I or Corporate Taxation; and (3) Basic Principles of Finance (an online course that must be completed in a student's first semester in residence)."*

103. However, statements in Ellis Duncan email are not truthful, it is another lie and misrepresentation, and an intentional misinformation. The Federal Income Course must be taken during the LL.M studies but not in the first Semester. Basic Principles of Finance must be taken in the first Semester. The courses are different. Link refers to the new wording of Student Handbook of Academic policies for 2023-2024 that is different and Ellis Duncan changed the rules for other periods but falsely insisted that these rules existed earlier. Moreover, based on the outlined above rule in the Student Handbook of Academic Policies (in force in 2020-2021 and same in 2021-2022

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Rules) (page 51 of the document) I had a choice to take Federal Income Taxation course anytime during my LL.M in Taxation studies or waive Federal Income Tax requirement at all like other students (based on the instructions from tax program director Ellis Duncan provided in emails I have completed the requirement) or take a special prerecorded online course like other American students do always at Georgetown Law. Such an opportunity to have online course that is already included in my tuition was not offered, and this is discrimination and differential treatment compared to other students because low quality professor lacking experience in Federal Income Taxation was offered to me (in a contrast to a high-quality experienced professor for other LL.M in Taxation students). My Federal Income Tax course at another American University was disregarded and I was forced to join junior JD group (not a special course for LL.Ms) and professor had a limited partial 2-year experience in American Federal income taxation. Maybe she has more experience in international taxation and doing admin job, but it is a completely different. She was not able to answer the questions either during office hours or during the classes or via emails. When I joined the office hours vice dean struggled answering as well and recommended to ask an experienced professor. That is the difference between an administrator and a good professor who is an expert in the subject. My question to that experienced professor did not receive attention, probably because that was not his job (class). The canceled class was not rescheduled during a 3 month remaining period of study in that Semester. IMO there is no difference between any online prerecorded Federal tax course and that online course that was mistakenly given to me. Probably they enrolled me in this course to make statistics nicer with double counting of students and receiving extra cash flows or for another unknown reason. Because of that course it was impossible to take other highly valuable and specialized tax courses (3 of high-quality courses were removed and they were no longer available at Georgetown Law in 2022-2023). I was

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deprived from the educational and other on campus and of campus opportunities because it was impossible to visit the events and orientations because of simultaneous dual degree studies. And I never visited the referenced events and was not notified that they exist. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds.

104. Moreover, on September 15th, 2022, because of the dean William Treanor event with the external guest Ellis Duncan rescheduled the class *U.S. Tax Lega Research, Analysis, and Writing* to another time with the conflict of another class (*Advanced Scholarly Writing*). I was deprived form the opportunity to visit the class and ask the questions because there was another class simultaneously since it is impossible to visit both classes at the same time. This is a deprivation of the right to receive educational services simply because William Treanor needs crowds to visit his discussion with the external guest. This is wild and not appropriate.

105. On November 29th, 2022, academic advisor Ellis Duncan wrote the following in the email in an attempt to create illusion that he advised correctly (misinformation because he referenced to a new version of the STUDENT HANDBOOK 2022 that was not in force in 2021) (see exhibits): ***"Federal Income Tax course (Spring 2021): As you are aware, all foreign-trained students enrolled in the Tax LL.M. program must take Federal Income Taxation in their first semester in the LL.M. program (see page 48 of the Student Handbook, [here](#)). As a preliminary matter, I am sympathetic to some of the confusion that may have ensued as a result of both the pandemic and your enrollment in two programs at two different schools simultaneously. Putting aside your MBA program and focusing solely on the guidance that you were given by me and the law school, for***

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the 2020-2021 academic year, students were given the option of starting the LL.M. program either in the fall 2020 semester or the spring 2021 semester. Because providing this option resulted in various considerations that students needed to consider, I provided detailed guidance in the Course Selection Advice Guide for Foreign-Trained Tax LL.M. students (available [here](#)). This guidance was provided in my Tax Notes newsletter to all students in June 2020 and July 2020, posted on the Admitted Students website and also on the main Tax LL.M. website, and the details were discussed during my course selection webinar on July 8, 2020, at the fall Orientation program in August 2020, and at the mandatory spring Orientation program in January 2021 (which you, as a matriculating spring 2021 student, were required to attend). This information was disseminated widely, so you had ample opportunity to consider your options. As you can see on pages 1-2, students had two options - take Federal Income Tax in the fall semester with Professor Smiley, or in the spring semester with Professor Grinberg (who was replaced by Professor Faulhaber when he joined the Treasury Department). These two classes are almost identical, except that Professor Smiley's class is limited to foreign-trained LL.M. students, while Professor Faulhaber's class mostly consisted of J.D. students, it was not limited to J.D. students in the spring of 2021. Because you made the choice to matriculate in the spring of 2021, per the Student Handbook and the Course Selection guide that I linked above, you were required to take this class. If you had any issues with class, you had the option of withdrawing before the end of classes, did not do so, sat for the final exam and received a grade. Even if you would be permitted to transfer into the Executive LL.M. program (which you are not, see below), this course and your grade cannot be removed from your transcript under any circumstances.

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There was not a mistake in registering for this class because it was required in your first semester as a student and you were well aware of this fact."

106. Georgetown Law enrolled me in Federal Income Taxation course (*void ab initio*) without the meeting of minds in 2020-2021 and in violation of academic policy, i.e. in the 1st Semester of studies (instead of another Semester) and the course was a basic one with a JD code (instead of the advanced special LL.M course). LL.M students have a more advanced course with a high-quality professor who answers questions during office hours, via emails, and during classes, and doesn't cancel classes (without rescheduling). Direct quotation from Student Handbook 2020-2021 and 2021-2022 (policy rule): *LL.M. in Taxation "In addition to the general requirements, foreign-educated students must complete 20 credits, including a minimum of 16 "specialization credits" in courses listed under Taxation in the Curriculum Guide. As part of the required 16 specialization credits, students must complete the following three courses: (1) Federal Income Taxation; (2) Corporate Income Tax Law I or Corporate Taxation; and (3) Basic Principles of Finance (an online course that must be completed in a student's first semester in residence)."* Also, from page 47 of the Student Handbook: *Note: Any student who has not previously taken Federal Income Taxation may satisfy this prerequisite by taking the online course Foundations of Federal Income Taxation prior to matriculation and receiving a passing score on the final examination. It was not allowed to take it and I finished in December 2020 another Federal Income Tax course at another University (online) with a certificate KYARC4KFWAUS (based on the understanding from Georgetown people and advising from Academic advisor E. Duncan that they will waive it).*

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107. Other students had no misinformation and didn't suffer from advising mistakes. Therefore, this is a different treatment compared to other students, and it is discrimination against me.

Example N

Mistakes. Empty promises. Misinformation.

108. For unknown reasons and purposes an MBA course "Transfer Pricing: Selected Topics" (taken as a part of MBA study and paid with MBA tuition) was transferred to LLM transcript. Later the representatives of Georgetown Law Registrar's office and two deans (Tiffany Joly and Madhavi Sunder) promised to remove it but failed to do so. On my MBA transcript, I have all courses taken at different Georgetown Law schools and others (School of Continuing Studies and LBS), but someone decided to remove for no logical reason "Transfer Pricing: Selected Topics" to LL.M in Taxation transcript from my MBA transcript. Other students did not suffer from such mistakes and have transcripts without mistakes. Thus, it is a different treatment compared to other students, and it is discrimination.

Example O

Mistakes. Empty promises. Misinformation.

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109. Georgetown Law did not record academic leave during the study abroad coding in Fall 2021 and made a mistake with no LL.M studies period in the Spring 2022 Semester (when someone at Georgetown forgot to process payment and there was a mandatory withdrawal from the Corporate Income Tax Law I course). Because of the forced withdrawal for the course my graduation was postponed. Therefore, this is a different treatment compared to other students, and another example of discrimination against me because of my national origin (Russian and Jewish roots). Other students had no such issues and no mistakes on their transcript. I can provide additional materials, explanations, and clarifications in this respect.

Example P

My 4 submitted complaints in May, 2023, to Diversity, Equity & Inclusion office (now IDEAA) because of discrimination were ignored by IDEAA office, initial investigator Michael Frisch (professor and assigned investigator), and new investigator based on IDEAA message after the impeachment (Mitchell C. Bailin (Associate VP and Dean of Students) disappeared and did not investigate 4 complaints. My complaints were not investigated, and everything was messed up (see mistakes) in the response of Michael Frisch (after I impeached him). This is the discrimination and differential based on national origin (Russian and Jewish roots) and other grounds (race, color, age, gender). Breach of contract by Georgetown University and privacy.

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110. Specifically, some of the reasons to change the representative of Georgetown University who reviewed my submissions were as follows:

- He failed to provide updates, the status, links for materials, procedures, and actions taken (it was requested several times);
- He failed to provide a breakdown of 4 of my submissions you received about harassment, discrimination, issues with integrity, dishonesty, and trustworthiness;
- He shouted loudly during a quick conversation and did not provide answers to my questions;
- He is not independent and more likely than not he is biased or made an appearance of being so (based on the conversation and the facts);
- He failed to provide explanations and breakdowns so I can make reconciliations. There is no transparency and accessibility of relevant policies and facts.
- During one short meeting, he explained that the only action he made - he disclosed information to professors of the International Tax and Business Planning Course while it was not required. I didn't provide my consent for sharing such confidential information with the professors.
- Despite the empty main and Georgetown Law campuses and the full availability of other meeting rooms at the university libraries, he invited me to the room that was full of other people (as he explained to preserve confidentiality). Despite me being 6 minutes late because of issues – about 10 Georgetown people exited that meeting room. It does not look like an efficient "confidentiality strategy".
- There were no excuses during the events in the commencement week and rebatement of rumors (it was requested in complaints while that was the purpose of the complaints).
- Other reasons.

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111. After I made the impeachment of Michael Frisch I received from him the link to the following text (direct quotation): *"I have completed my investigation of the complaints that you filed against three of your classmates in International Business & Finance. The three classmates Devvrath Arora, Julien Temblay-Gravel, and Alexey Pustovit were part of a team with you that operated as a law firm in fulfilling various class assignments. In aid of my investigation, I have reviewed the complaints that you filed with IDEAA, which were referred to me as Ethics Counsel, and the attachments appended to each complaint, interviewed the course professors, and met with you in person. At our meeting, I requested that you promptly advise me of any additional information that you possessed in support of the complaint. For the reasons explained below, I have decided to dismiss these complaints. You allege that your classmates engaged in money laundering, conduct involving dishonesty, discrimination, and harassment. You have provided no evidence to substantiate the money-laundering allegation. The dishonesty allegation involves the removal of some proposed slides by Mr. Tembley-Gravel relating to a course assignment and a statement to the effect that you should not wear a red tie at a class presentation. My interview with the course professors revealed that they were aware of the disagreement concerning the removed slides and that you were able to present the information. They also confirmed that no conduct of your classmates had any impact on their evaluation of your performance and that there was no indication that any conduct of your teammates in any way inhibited your ability to express your views. The purported dishonesty appears to be no more than a disagreement between course teammates over the presentation of a course assignment. There was no evidence of concealment or a false statement. The alleged discrimination and harassment involves an online discussion of the current situation between Russia and Ukraine. The purported harassment appears to be no*

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more than a spirited discussion about highly charged current events. Accordingly, I am dismissing the complaints."

112. As was explained earlier the investigator messed up everything and did not understand my complaints. That is not truth in his text. Such actions in my opinion were aimed to conceal the violations at Georgetown University and hide inappropriate actions (omission of actions).

113. IDEAA office supervisors and employees Rosemary Kilkenny and Olabisi "Bisi" Ladeji Okubadejo did nothing to investigate 4 IDEAA complaints in May 2023 and disappeared completely with a reference that this is not their job, and that Georgetown Law is responsible for own investigations and complaints. Same as the earlier violations made by MBA professor with inappropriate SUCKS language with respect to the country of national origin (either in sexual or non-sexual meaning) and wild prohibition to speak and participate in the class activities, i.e. Georgetown University admins did nothing to prevent targeting me because of my national origin. Explanation from the assigned administrator Michael Frisch messed up everything and it is clear that he didn't act in good faith and with *bona fide* purposes as being only concern with possible weak anti money laundering systems with respect to the tuition payments from certain countries. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. I can provide additional materials, explanations, and clarifications in this respect. Dean Bailin who was named by IDEAA as a dean who will solve the issues disappeared. Frankly speaking I didn't know that he exists prior to the IDEAA appointment.

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Example Q

Systematic misinformation and misrepresentation by Georgetown University officials with the purpose to mislead and overcharge.

114. Information about the opportunities to receive courses outside of MBA program at the law school (that are included in MBA flat tuition and accounted as required credits for my MBA degree for graduation) was hidden from me when McDonough School of Business and Georgetown Law were persuading me to do both MBA and LL.M in Taxation studies simultaneously at different schools to improve their statistics and extract additional tuition money. It is obvious for any unbiased person that there is a breach of fiduciary duty, Georgetown University acted in conspiracy not in fair dealing and not in good faith. It was explained that I can probably graduate simultaneously or have almost nothing to complete in May 2022. That was not true. I was forced to graduate with my MBA in 2022 and it took 1 year to complete LL.M in Taxation studies (to be eligible for the bar exams). Please see the rules from the MBA Student Handbook (page 46):

"Registration – Outside the MBA Program

As a 1st year Full-time or Flex MBA student, you may earn up to 13.5 credits out of the 54 credits needed for the degree from classes taken outside of the MBA program. Continuing 2nd and 3rd year students may earn up to 15 credits out of the 60 needed for the MBA.

Any course taken outside the MBA program must meet the following criteria:

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- *Be graduate level*
- *Be related to and enhance the MBA curriculum*
- *Be unavailable at McDonough (exceptions may be granted for courses taken at international exchange partner programs)*
- *Be taken for credit at degree-granting institutions*
- *Meet McDonough academic standards*

Approval from the MBA Program Office is required for any course taken outside of the MBA program by the deadline your Program Advisor communicates. Since seats may not be guaranteed until the first week of classes, plan for a full MBA class schedule during registration and drop MBA electives when your outside course registration is confirmed.

If course credit hours do not match up with MBA credit hours, it is your responsibility to address any discrepancies with your Program Advisor to ensure you are on track to complete the total number of credits required for graduation.

Note that the MBA academic calendar differs from that of the host school or institution, so be sure to check all required dates, deadlines and schedules carefully for outside courses."

115. Thus, there information that I can receive Georgetown Law courses as a part of my MBA program (and MBA tuition) was hidden and not disclosed to me in 2020 when Georgetown Law and McDonough School of Business convinced me to do both programs simultaneously as an experiment. Moreover, based on MBA rules (MBA Student Handbook for 2020-2021 and other versions) I could graduate with a delay simultaneously in 2023 that could be much better for my career perspectives because it is obvious that employers are not interested in someone who is still studying and not able to work or someone who received one degree some time ago (i.e. not fresh).

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Thus, Georgetown University schools acted not in my interests and there was a differential treatment compared to other students. There were no other reasons for that than my diverse national origin (Russian and Jewish).

116. Interestingly, I had no access to MBA career services since Summer 2022 because I was deprived of such rights despite the possibilities to enjoy such rights pursuant to MBA Handbook and policies with simultaneous graduation. I.e. I had no access to MBA career center services after my MBA graduation. On June 29th, 2022, I had a meeting with Maureen Cleary (Assistant Dean, MBA Career Center) regarding employment. Earlier she was helpful with her advice and opinions. Unfortunately, she informed that I do not have access to employment services and systems anymore because of the graduation from MBA program irrespective of my continuing education at Georgetown Law to receive LL.M in Taxation degree and be eligible for the bar.

117. Based on my experience at Georgetown University admins and bureaucrats from the deans to IDEAA office try to conceal problems and mislead to deprive from legitimate rights, like in a conspiracy. Everyone at Georgetown University was interested in the maximization of cash flows, as Ellis Duncan (Tax Program Director) explained during one of the U.S. Legal Research, Analysis & Writing classes that he can speak about education, and education is a business based on his career experience at Georgetown University. It was explained in the context of our discussion during one class about the differences in the tax profession between the tax services at BIG 4 accounting (CPA) firms and the licensed tax law practice at law firms, i.e. where this is a craft and where a business... I believe that all the advising mistakes and violations were intentional, e.g. the not suitable courses selection and a mess with the periods when I need to take them aimed to create higher and earlier cash flows for Georgetown University. The fiduciary duty as well as Fair Dealing standards and good faith requirements were breached by Georgetown

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University based on the totality of circumstances and all examples provided in this complaint. At the same time other students received good support and advisory services aligned with their career goals. Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. I can provide more information and materials in this respect.

Example R

Georgetown University deprived from quality advisory services that are relevant for my programs, withdrawn from Corporate Income Tax Law I course (because they made a mistake in processing payment), enrolled in overcrowded course U.S. Tax Legal Research, Analysis, and Writing³², enrolled in other courses in violation of rules (Advanced Legal and Scholarly Writing), and unnecessary course (Introduction to Contracts), and 5 Summer courses (while only 2 are allowed for bar eligibility). All the efforts aimed to create more revenue for Georgetown University at the expense of my legitimate interests. It was prohibited to take Evidence course in the Summer 2022, and I was forced to take it in Spring 2022. GU deceived and misinformed.

118. In February 2023 there was a withdrawal from Corporate Income Tax I course while it was required for my LL.M in Taxation program (requirement to graduate). There was no time conflict with any class at the business school. After the withdrawal I was forced to join late other MBA class as a student for transcript grade. The reason for withdrawal was a mistake at

³² A course with questionable assignments related to deductibility of regalia and tuition costs as Big 4 firms do not practice law in the US.

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Georgetown Law because the loan was not processed on time (another admin issue). And people were not interested in processing it to resolve the problem quickly using the logic: let's better force the student to withdraw... Actually, it created big problems because of the additional delay in graduation from LL.M in Taxation program and late enrollment to the MBA class when part of the assignments already passed. This is a clear deprivation of educational opportunity and a malice postponement of graduation from LL.M.

119. Georgetown law made incorrect enrollments in several Fall 2022 courses that forced me to withdraw because that was against the rules of Georgetown Law and not in line with my goals. The reasons for withdrawals were stated in the documents. Specifically, there were systematic mistakes in enrollment in several tax courses and courses that are required for New York State Bar exam eligibility. It was prohibited to enroll during the Summer 2021 and Summer 2022 in Evidence and legal research & analysis courses (despite my applications to enroll in these courses). For the Advanced Legal and Scholarly Writing course there was a requirement to be enrolled in a seminar course to write a paper, such requirement was not satisfied and enrollment was unlawful though I had ideas to find knowledgeable tax professor to create and publish a tax article (it didn't happen). In the Fall Semester 2022 there were mistakes in enrollment in Advanced Legal and Scholarly Writing course (since I had no seminar course and there was no expert professor in transfer pricing to write an article) and Introduction to Contracts course that is not relevant for my career. Other courses to enroll in were full or with a long waitlist, e.g. 40+ people. Most specialized and advanced tax courses are offered in the Spring Semester because in the Fall Semester students generally have basic courses. People can receive required credits for New York State Bar exam eligibility at many law schools with relatively basic other courses and for a relatively low price. Thus, because of mistakes and incorrect selection of courses that are not

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aligned with my career goals and study plans I ended with several basic and/or non-meaningful courses in the Fall that contradicted my plans. Courses like Introduction to Contracts, U.S. Tax Research, Analysis, and Writing, Advanced Legal and Scholarly Writing, and others are very basic and not related to my career goals. There were no American-trained law students in these courses and that diluted the quality. It was a huge problem because I was not able to receive access to advanced and specialized courses – the main reason why I decided to enroll in the program.

120. The course Advanced Legal and Scholarly Writing is designed for students with the requirements to write a paper during their Fall Semester, mainly to meet certain specific needs for some programs. There were no American-trained graduate law students in this course or anyone writing an article for publishing. Although I enjoyed that course and asked for enrollment because I had an idea to write an article for publishing that is related to certain sophisticated tax issues with respect to financial guarantees. I had no courses with paper requirements in the Fall Semester. Thus, I was not eligible to enroll in that course.

121. The above-mentioned and systematic mistakes at Georgetown Law (combined with the absence of clarifications and misleading information, e.g. about change to executive LL.M. in Taxation) affected my performance dramatically and were serious significant reasons for withdrawal from the courses in the Fall Semester 2022..."

122. There were systematic attempts to deceive me and make misinformation (e.g. systematic misleading communication with deans and admins Tiffany Joly, Ellis Duncan, Madhavi Sunder). For instance, dean Tiffany Joly on May 30th, 2023, explained following:

"Transcript

Your Georgetown Law transcript has been updated as you requested. The Transfer Pricing

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course has been removed from the LLM section of your law school transcript. The Transfer Pricing course is listed on a separate page, in a separate section, with a title that clearly shows it was taken as part of your MBA. You took the class at Georgetown Law; as a result, it is part of your Georgetown Law academic record. It is listed in a separate section because you took it as part of your MBA course of study.

I reviewed the email thread "Critical issue. Urgent!" from Nov. 30 to Dec. 7 which included the sample transcript from Maryam that you attached below. I can see how the confusion arose, but please note that Maryam was very careful to say that she was removing the course from your LLM transcript. She said they would fix the non-degree section, which they did by clarifying under the non-degree section that it was taken as part of your MBA degree."

123. However, this is not true. The transcript must be on one page as it is in the email from Maryam (see email dated December 1st, 2022). It is not a sample transcript but my transcript of how it must look like without MBA course (the draft of the corrected transcript was with removed mistake on one page). It is impossible to interpret email in another way.

124. Moreover, based on the official explanation from the Registrar's office: (i) once the removal is processed I will be informed by associate Registrar (it never happened, i.e. the course was not removed (it remained in the same section of LL.M. transcript as it was before and therefore there was no notification); (ii) the correct version was emailed by Maryam (see email dated December 1st, 2022) and it is on one page; (iii) Attached Appendix is my transcript from the business school (MBA program). As you can see, I had courses at other schools at Georgetown University (see the course Impact of Globalization on Real Estate (School of Continuing Studies)) and outside Georgetown University (LBS). Everything is in the transcript except a transfer pricing

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course. Direct quotation from email dated December 2nd, 2023: *"The Associate Registrar of Registration will get back to you, once your Transfer Pricing Course is removed from your LLM transcript"*. But I received official transcripts with an old mistake – the transcript is on 2 pages with the Transfer Pricing course that was part of my MBA study and MBA tuition and must be on MBA transcript. It was promised by Madhavi Sunder and Tiffany Joly many months ago to remove the mistake in several business days (MBA course in LLM transcript)). The mistake was not corrected.

125. Same with the explanations from Ellis Duncan (admin and Tax Program Director) about the selection of courses in violation of Student Handbook (see above) and a prohibition to transfer to executive LL.M in Taxation program. In the email dated November 29th, 2022, Ellis Duncan even made jokes about my age and career. Direct quotation from the Georgetown Law representative: *"... Aleksei - I believe that I have done everything that I could have in order to provide you with the appropriate guidance on degree requirements, and worked with you along the way to ensure that you were able to complete both the LL.M. program and MBA program simultaneously, to make sure that you were able to register for all of the courses that you needed along the way, and to make sure that you would meet the requirements to complete the degree program and requirements for the New York bar. I have, as always, gone the extra mile here, and you seem quite unappreciative of my efforts. I'm afraid there is nothing else that I can do at this point, other than wish you the best in your studies going forward and in the remainder of your career."*

Therefore, this is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin, race, gender, and age.

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Example S

I was treated differently compared to other MBA students and MBA Exchange students because I was forced to visit courses online while everyone else studied in person because no student visa was provided.

126. Due to the unprecedented problems with tuition money payment (delay for many months) and UK Visa and Immigration Services, I was forced to participate in all LBS courses online via Zoom. Georgetown University and LBS didn't provide invitation for student visa and insisted to visit on regular short-term visa that is used for travel. My LBS experience is not comparable to other students (in-person vs fully online) because all MBA students in DC and abroad studied in-person while I was online. Problems first started because of processing delays with required financial documents at Georgetown University and continued via unexplained delays at the UK Visa and Immigration Services. I requested additional documents to travel from LBS as well, but it was explained that it is first time people at LBS deal with it. Due to this distance learning, I missed out on my opportunities to clarify with professors, and seek feedback. As an MBA candidate, my virtual "study abroad" experience took away from interacting in a meaningful way, pushing me into an unknown area, attending classes at special hours (due to the time difference). I had no chances to be a part of LBS community and to speak to LBS professors, I didn't receive feedback for my projects and papers, all course materials disappeared and were not provided (I only had access to materials in Fall 2021). The fall semester at LBS cost more than \$30,000 and I never had the chance to visit the Campus. I had no academic advisor and support at LBS with explanations of how everything works. Other students didn't suffer such issues. Therefore, this is a different treatment compared to other students, and it is discrimination against

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me. Moreover, didn't record study leavy on the LL.M in Taxation Transcript because of my study abroad (despite a direct instruction to Georgetown Law officials including Registrar's office from the MBA team). I can provide additional materials and information regarding this issue. Therefore, this is a different treatment compared to other students because they enjoyed in-person study and have access to study materials and communication with professors and community while I was deprived of such access. It is discrimination against me because of, *inter alia*, national origin and other grounds.

127. This is a direct quotation from the email dated May 6th from another academic advisor for MBA program Lisa Kahn who was not professional in my opinion and participated in wrongdoings against me: *"The Georgetown University Associate University Registrar for Academic & Student Records has told us that your signature and consent is not needed at this point in order for your study abroad coursework to be reflected on your Georgetown transcript. You chose to be part of a formal study abroad program as part of your Georgetown MBA, and that program is reflected on your Georgetown transcript for Fall 2021. You were aware that your study abroad coursework would appear on your Georgetown transcript when you applied to study abroad. You chose to continue your studies at LBS even though you could not be there in person."*

I didn't provide consent to make records about LBS study because it was in violation of the rules and they didn't receive my signature. I didn't receive what was expected and they didn't arrange proper visa invitation, necessary document flow, and processing of payments on time to request visa. I was deprived from in-person study, visits to campus and MBA events in London at LBS, I was unable to ask and receive answers from professors in-person and my experience was dramatically different compared to other students. Despite the time differences I just had access to online classes and I didn't even receive study materials from LBS despite my requests to provide

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them after the end of the classes, they refused to give them. I didn't receive feedback and commentaries on papers and submission. I didn't receive the service I paid for. This is differential treatment and discrimination based on national origin and other grounds. This a direct quotations from my email to dean Kerry Pace and academic advisor Lisa Kahn dated May 6th, 2022: I am a dual degree student: *“I will finish my study at Georgetown Law in December 2022. I can receive a diploma (degree) later (e.g. in August) since there are certain admin delays and procedures to complete that are outside of my control. The timing doesn't really matter. I have a right to receive documents after the resolution of all the issues and mistakes. You do not have my consent to transfer anything that is not verified or final. My will is clear, I do not agree. As I explained earlier it is a mistake (image that you have from LBS)... Moreover, from the legal standpoint and based on applicable regulations and powerful doctrines you do not have my agreement for that. In March 2021 I expressed interest in traveling to study abroad and it was conditional on traveling issues. A significant change in circumstances is really importnat. Finally, there was a lot of drama outside of my control. I am really busy now and have COVID. There is no way that my rights will be violated in a hurry or just because I am overwhelmed with some issues or I didn't receive the required information. Enjoy the weekend! Let's be professional and solve the issues on a win-win basis without harm and damage to a dual-degree student.”* This is a direct quotation from dean Kerry Pace email dated May 10th, 2022, as another example of deprivation of educational and employment opportunities and not provision of the services I paid for): *“As Lisa indicated, your LBS transcript will be part of your MSB record. We have worked with colleagues in the Registrar's Office, Graduate School, and Office of Global Studies and have confirmed that including your LBS grades is not optional. You chose to be part of a formal study abroad program as part of your Georgetown MBA, and that program must be reflected on your Georgetown transcript - as it is for*

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all MBA students that participate in a formal study abroad program at MSB. Although I appreciate your frustration that you were not able to study in person at LBS, once that information was shared with you, you chose to continue your studies virtually. As we have told you repeatedly, you are not a dual degree student, you are a student pursuing two degrees concurrently. That distinction is critically important and dictates how your academic record is handled. Therefore, once you have completed your degree requirements for the MBA, it will be conferred. We cannot postpone awarding your degree and extending your time as an MBA student. Similarly, when you complete the requirements for the LLM, that degree will be conferred. They are separate degrees and as such, you are bound to the policies that apply to each stand-alone degree. In other words, the status of your LLM and the fact that you will still be a student at GULC after May 2022 is not relevant to the fact that you have completed your MBA." Other MBA students from previous year postponed graduation because they didn't travel physically abroad, they finished in December after traveling in person, I was deprived from such educational opportunity. Moreover, it was clear that their request for permission to record the "LBS online experience" on my transcript as MBA study was not granted, they disregarded my rights and did everything against my interests (as usual). Despite my actions and explanations about violations of my rights there were again violations and all that were examples of different treatment and discrimination based on national origin and other grounds.

Example T

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My scholarships and grants as well as scholarships and grants that students with Russian national origin receive are much lower compared to other students because of systematic discrimination based on national origin and other grounds. Georgetown University experienced huge financial problems in 2020-2023 and dramatically increased its revenues from students in a form of tuition (fees) while true cost of tuition and normal profit margin are much lower (compared to other similarly situated students). It looks like there are more admin people than students and they do not work in Good Faith and based on Fair Dealing standards. No one cares even that there are different schedules for Fall and Spring breaks (I had no breaks). Allocation of scholarships created discrimination and statistical differences, negative discrimination.

128. My scholarships and grants accounted for less than 5% of tuition costs because of mistakes in advisory and enrollment in unnecessary courses, there is a breach of fiduciary duty. I have more than 3 hundred thousand dollars of student loans while at Georgetown University there are discriminations with employment support (see above), privacy issues, systematic misinformation with misrepresentation and other discrimination based on different grounds. We can see the statistics on the students with Russian national origin and find that the scholarships are much lower while tuition is much higher compared to other students. Georgetown University simply extracted above average tuition while didn't provide expected level of service and breached duties, deprived form benefits and created barriers for employment. There are too many admin people at Georgetown University who lost the drive and forgot the values and who are the clients they are working for. It can be understandable that there are lots of admin people³³ at leaders like Harvard University, MIT, Yale University, and Stanford University because they have huge

³³ <https://www.thecollegefix.com/mit-adds-12-staff-for-every-1-undergrad-over-past-decade/>

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endowments like more than 40 billion dollars and are champions in the endowment returns with competing models (see Harvard vs Yale). Admins there are involved in sophisticated machinery, medical, science, and AI research and it changes the world to a better place to live. They can afford extra expenses because sponsors trust money to create a heritage and believe that the practices at the leading universities are good and not against students. In contrast we see that at Georgetown University that there are no comparable activities, and it is more like *bureaucracy that is a death of all sound work* (Albert Einstein). *Cui prodest?* There is unprecedented inflation of tuition and college books (while libraries do not have enough books). The same value now is several times more expensive than 2 decades ago or even quadrupled if we look 4 decades ago. This is at a cost for students³⁴ who are unfamiliar with everything³⁵. Georgetown University and admins believe they are above the law because of connections in DC.

³⁴ <https://nypost.com/2024/07/04/us-news/american-student-loan-balance-tops-1-6-trillion-half-of-borrowers-havent-resumed-repayment/>
<https://www.nytimes.com/2024/07/02/business/student-loan-nonpayment.html>

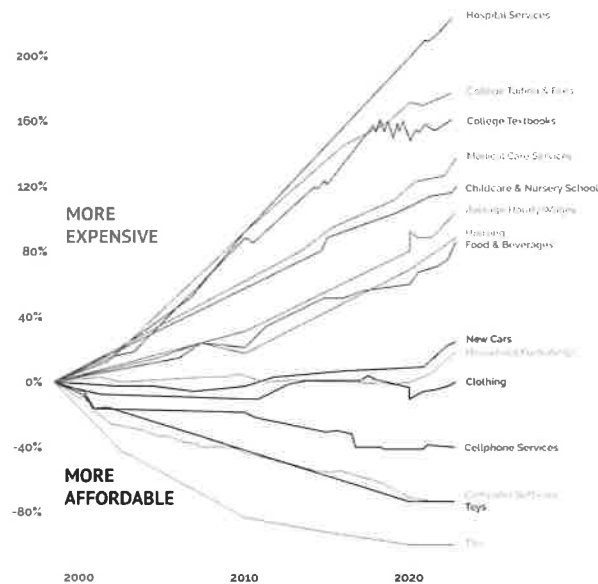
³⁵ 1982 - Present: Inflation Vs The Cost Of A College Degree | Why The Dramatic Increase? (uvaro.com)

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Price Changes: January 2000 to June 2022

Selected US Consumer Goods & Services, Wages



Source: Bureau of Labor Statistics

129. Misinformation and misrepresentations aimed to create additional incremental cash flows for Georgetown University that made mistakes with gambling with derivatives (see note 12 to the financial statements with the liquidation of SWAPs at loss measured more than 28 million dollars) and had a high debt burden. Based on the financial statements for the periods 2021-2023 and the credit opinions from Moody's and S&P credit opinions Georgetown University experienced financial difficulties and was forced to increase tuition and fee revenues from students. Even in 2023 GU terminated swaps that were mistakenly executed earlier either for speculation or as a hedging mistake with a net financial loss at fair value at 28 million dollars (see attached financial statements and notes). Interestingly during the pandemic GU officials explained that they are not able to help students because they will have credit ratings downgraded. This is a different treatment compared to other students. It is discrimination against me because of, *inter alia*, national origin and other grounds. Thus, numerous mistakes and double counting with the deprivation of

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educational and employment opportunities was not incidental. It was a policy at Georgetown University to take advantage over naïve students who are unfamiliar with the education in the US. If we look at statistics, we see that my gross tuition as well as net tuition after (grants and scholarships) is much higher compared to other students.

It was explained to me at Georgetown University by the official representative that Georgetown Law communicates with others about my admissions. There is no transparency and it is beyond the reasonable doubt that Georgetown University cooperated with others about the amount of financial aid, scholarships, grants, and admissions of students like Dartmouth (settled the lawsuit recently³⁶). On July 20, a court-approved Dartmouth’s \$33.75 million settlement proposal in a class action lawsuit accusing the College — along with 16 other universities — of violating antitrust laws and conspiring to minimize financial aid for working and middle-class families. According to the lawsuit, universities including Dartmouth and Georgetown University created a “price-fixing cartel” through the group in an effort to reduce financial aid, “artificially inflating” the price of attendance. The universities “systematically favored” wealthy applicants in the admissions process.

Statistics show my merit based and need based scholarships are much lower compared to other students because of discriminations based national origin and other grounds.

³⁶ <https://www.thedartmouth.com/article/2024/07/court-approves-dartmouth-settlement-in-financial-aid-case>

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Key indicators

Exhibit 2

GEORGETOWN UNIVERSITY, DC

	2018	2019	2020	2021	2022
Total FTE Enrollment	17,203	17,474	17,032	18,465	18,428
Operating Revenue (\$000)	1,220,225	1,325,083	1,319,368	1,252,686	1,544,074
Annual Change in Operating Revenue (%)	4.1	8.6	-0.4	-5.1	23.3
Total Cash & Investments (\$000)	1,914,123	1,921,157	1,937,637	2,651,846	3,334,191
Total Debt (\$000)	943,319	1,272,199	1,486,503	1,492,665	1,638,456
Total Debt to EBIDA (x)	12.0	12.5	23.3	19.9	8.1
Annual Debt Service Coverage (x)	1.6	1.7	1.0	1.3	2.2

2022 pro forma includes the net impact of the proposed \$300 million 2023 borrowing to total debt

Source: Moody's Investors Service

Example U

130. I join other Jewish students' complaints with respect to the awful events that happened in 2020-2023 at Georgetown University while I was a graduate student and in 2024 while I had rights to use certain employment services because they were not provided earlier. There was and there is a support and disclosure in the news about these events because of the size of the Jewish community in the US and DC specifically. My other systematic issues at Georgetown University and complaints were caused because of my mixed national origin (Russian and Jewish blood roots) and other grounds. I am like David in the ancient story with Goliath because I do not have support and help in dealing with professional law professors having powerful connections in DC. As you know similar discrimination issues are happening systematically at many universities. For instance, Columbia University is the top University in the US, and they already settled some complaints and continue

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investigations of emails and text messages with antisemitism³⁷. There are numerous incidents with the discrimination of Jewish and mixed Russian-Jewish national origin students at Georgetown University, e.g. swastika appears systematically and there are other wild incidents (see examples here³⁸). It is crazy that swastika appears frequently and there are inappropriate events and speakers. Even cafes and restaurants for Jewish and Russian people are vandalized nearby.

Example W

Incidents with unlawful disclosure of private protected information are systematic. Earlier I provided an exhibit with Madhavi Sunder email and her disclosure of the protected medical information about the family member protected medical information to her colleague. Same with the inappropriate actions by Caroline T. Springer, Michael Frisch, Cornelia Gustafson, and others. I can provide additional materials and clarifications in this respect.

³⁷ https://www.nytimes.com/2024/07/08/nyregion/columbia-university-deans-antisemitism.html?campaign_id=60&emc=edit_na_20240708&instance_id=0&nl=breaking-news&ref=headline®i_id=206413564&segment_id=171588&user_id=15340e9ab39ab5564cff8566fd4e8644

³⁸ <https://www.washingtonpost.com/education/2022/05/05/after-controversies-georgetown-law-students-call-culture-shift/>
<https://www.nationalreview.com/corner/georgetown-law-dean-defends-hosting-antisemite-citing-previous-speakers-who-find-gay-marriage-immoral/>
<https://www.foxnews.com/lifestyle/jewish-students-georgetown-law-fear-violence-amid-rhetoric-classmates-anti-israeli-groups>
<https://thehill.com/opinion/4337687-justifying-hamass-barbarism-on-the-sly-at-georgetown-law/>
<https://mosaicmagazine.com/picks/israel-zionism/2022/04/georgetown-law-school-hosts-a-notorious-anti-semite/>
<https://www.adl.org/campus-antisemitism-report-card/georgetown-university>
<https://www.jns.org/israel-hating-faculty-train-diplomats-at-georgetown/>
<https://www.algemeiner.com/list/the-40-worst-colleges-for-jewish-students-2017/georgetown-university/>
<https://www.nationalreview.com/corner/hamas-sympathizers-at-georgetown-university/>
<https://www.foxnews.com/media/jewish-college-students-scared-class-blame-universities-silence-antisemitism>
<https://www.timesofisrael.com/med-students-antisemitic-comments-after-oct-7-riots-two-prominent-de-universities/>
<https://georgetownvoice.com/2024/03/22/amid-rise-of-antisemitism-jewish-students-seek-community/>

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Example X

IDEAA and other officials of Georgetown University did nothing in 2022-2024 with respect to the violations of my legitimate rights. Internal policies are not followed when there are violations of rights of the student with Jewish and Russian national origin. Systematic violation of privacy rights.

These examples of the unlawful disclosure of private protected information are not full. There was a systematic disclosure of private protected information to the prospective employers and inside the different divisions of Georgetown University. There is no transparency in dealings of IDEAA and Georgetown University while some actions are clearly suspicious and cannot be explained to a reasonable person. Moreover, despite informing the officials of Georgetown University IDEAA office based on Caroline T. Springer advice on how to proceed with the privacy violations made by Ellis Duncan, dean Madhavi Sunder, Sunita S Iyer, and others there were no actions taken. This is a deprivation of my rights and different treatment compared to other students. In violation of internal grievance procedures, IDEAA refused to make intake meeting with IDEAA employee (I waited more than an hour at Georgetown University meeting room) and provide support. Based on the grievance policy after the intake meeting, I must make the selection between informal resolution or the investigation by IDEAA employees. It was not offered by IDEAA as well in violation of internal policy. IDEAA shared my confidential information without consent with someone in the Vermont State. See direct quotation about the internal confidentiality requirements in Georgetown Policy. It is clear that IDEAA violates rules and does not work when there is discrimination of students with Russian and Jewish national origin and other protected grounds. Such actions (omission of actions) of IDEAA are similar with earlier inactions for the

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complaints submitted in 2023 when there were no actions and support in response to threats to kill and other awful things, i.e. it doesn't matter if there is a complaint or not – IDEAA doesn't work or helps only selectively, actually discriminating students with Russian and Jewish roots and other protected grounds. I can compare such IDEAA failures with the recent extreme dissatisfaction by both democrats and republicans about inability of secret service to perform their duties. There was a bipartisan action to investigate on what is going on³⁹ while any rational reasonable person can see that in the rural area the number of buildings in 1 mile radius can be counted by the fingers and actions (omission of actions) were not professional, only a few workers saved the candidate from additional shot, including a brave female with Russian national origin. This is a direct quotation from the senator regarding the head of the service (responsible person): *"This was a 100 percent cover-your-ass briefing. ... No one has taken responsibility. No one has been held responsible. Someone has died. The president was almost killed. The head of the Secret Service needs to go,"*. During MBA study we had classmates from that service, and this is clear that omission of actions was caused by the orders and the supervisors (managers).

A direct quotation from my email about unlawful actions (omission of actions) by the IDEAA office at Georgetown University regarding, *inter alia*, the recent IDEAA complaints (the questions are not answered (see the end), IDEAA laugh at me, no intake meeting and support, IDEAA does not follow internal policies on my complaints):

"Dear, IDEAA team, its supervisors Rosemary Kilkenny and Okubadejo "Bisi" Okubadejo, and the executive of Georgetown University, the board members of Georgetown University (secretary Marie Mattson on their behalf),

³⁹<https://www.hsgac.senate.gov/media/rep/paul-and-peters-announce-bipartisan-homeland-security-and-governmental-affairs-committee-investigation-into-security-failures-and-the-assassination-attempt-on-former-president-donald-trump/>
<https://www.politico.com/news/2024/07/17/secret-service-congress-trump-shooting-00169187>

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My complaints that were submitted before were not reviewed and IDEAA made no actions with respect to the SUCKS language from the professor and targeting, threats to kill (burn like in a tank), and numerous other incidents. It doesn't matter if there is a formal submission or not because IDEAA does not act per se (based on my experience, maybe this is different for others).

Bisi emailed that all answers to my questions and requests were already provided in the following emails: June 12th, June 26, June 27, and June 30 from IDEAA, July 1, July 2, and July 9.

However, this is not true. IDEAA is laughing at me, probably with bad intentions.

Dehumanization efforts and 2nd sort human treatment continue.

Pursuant to Georgetown University internal rules for the review of complaints that were shared with me I have the right for the intake meeting to receive a general understanding of the relevant policy and this grievance procedure, as well as University support resources, as appropriate. The intake meeting may also involve a discussion of any interim or supportive measures that may be appropriate as well as information about the decisions and the outcomes.

Based on the Rules after the intake meeting, I have to make a selection on further actions that are binding for Georgetown University.

Complaints that were submitted in May 2024 are related to inappropriate disclosure of private protected information and other violations. Despite that and instead of taking the steps to protect

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information IDEAA shares my protected private information without authorization. You do not have my consent to share give my property and disclose any information.

I have very specific questions to IDEAA and its supervisors (Rosemary Kilkenny and Okubadejo "Bisi" Okubadejo). There are even no answers on when IDEAA work and when can I receive my intake meeting and clarifications from supervisors? My numerous emails and calls are not answered with information that can be considered an answer by a rational person.

We scheduled the intake meeting on Tuesday July 9th, 2024, but IDEAA people didn't visit Georgetown University meeting room. I was waiting for more than an hour.

A direct quotation from the emails that contain answers pursuant to Bisi. My list of questions is after the so called answers.

Direct quotation from email dated May 29th, 2024 (direct quotation):

Dear Aleksei,

The Office of Institutional Diversity, Equity and Affirmative Action (IDEAA) has received all of your recent communication to our office. We are currently reviewing the information that you shared and a member of our office will be in contact with you promptly.

Best regards,

IDEAA

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Direct quotation from email dated June 12th, 2024:

Dear Aleksei,

Thank you for your recent communication to IDEAA. Your complaint has been assigned to an investigator, who will be in touch with you in the coming days as part of the intake process.

Sincerely,

IDEAA

Direct quotation from email dated June 27th, 2024:

Dear Aleksei,

Thank you for your email communication. IDEAA has retained the services of Janet Faulkner to review the complaint that you submitted and assess appropriate next steps (from time to time, IDEAA uses trained, impartial, external investigators). You are invited to cooperate with her requests to speak about the complaint, to ensure that she has information necessary in her review. During this meeting, you will have an opportunity to share additional information about the concerns that you have raised and to ask questions about process and resources. There is information about IDEAA's process on IDEAA's website; you also might find it helpful to review IDEAA's grievance procedures. Your complaint is currently in the Intake stage of the grievance process (see page 6 of the grievance procedures). Ms. Faulkner is seeking to conduct an initial meeting with you on behalf of IDEAA.

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Sincerely,

IDEAA

Direct quotation from email dated June 30th, 2024:

Dear Aleksei,

Thank you for your emails. Your point of contact for this matter is the external investigator, Janet Faulkner. Please be in touch with her to discuss the complaint that you filed. IDEAA endeavors to address complaints in a prompt manner, consistent with the timeframes set forth in our grievance procedures. You are encouraged to read the grievance procedures if you have not already done so.

Sincerely,

IDEAA

Direct quotation from email dated June 30th, 2024:

Dear Aleksei,

I hope this email finds you well. I encourage you to review the information previously sent to you by IDEAA and the external investigator, including the IDEAA grievance procedures and IDEAA's information and resources page. I believe that a review of previously shared information will

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show that many of the questions you are asking have already been answered.

Some of your requests seek business confidential information, which IDEAA is unable to share.

With regard to your questions about preservation of documents, you might consider reviewing the university's Record Retention and Destruction Policy.

Best,

Bisi

Direct quotation from email dated July 1st, 2024:

Dear Aleksei,

You are invited to attend a Zoom meeting tomorrow at one of the following times: 2pm-2:30pm or 3pm-3:30pm. In attendance at this meeting will be a trained, neutral IDEAA staff member and IDEAA's trained, neutral assigned investigator, Janet Faulkner. I have taken note of your preference not to engage with an external investigator; however, the decision regarding staffing of IDEAA's matters is a discretionary decision by IDEAA. Please be advised that should you choose not to attend the meeting, IDEAA may be constrained to assess next steps in the process based on the information provided in your complaint.

Please look out for an email invitation to the meeting.

Direct quotation from the email dated July 1st:

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Martin Luther King

Dear Aleksei,

Thank you for your email. I have moved Ms. Kilkenny to the "bcc" line. As you are aware, the prior matters you filed with IDEAA were assessed through IDEAA's intake process and referred to the Law Center, consistent with the requirements of the University's Policy Statement on Harassment (Relating to Protected Categories).

IDEAA has asked Janet Faulkner to respond to the complaint that you recently filed with IDEAA. You are invited to engage with her as a next step in the process. If you would like an IDEAA staff member to be present during that meeting, that can be arranged. Please respond to one of the emails you received from Janet Faulkner to set up this meeting.

Please note that IDEAA's process is not a legal process. Instead, it is an administrative process of the University. As such, individuals who administer IDEAA's process may be, but are not required to be, lawyers. With regard to your remaining questions and requests, please refer to prior emails from IDEAA, Janet Faulkner, and me.

Direct quotation from the email dated July 9th:

Dear IDEAA team,

I still do not have answers to my questions.

This is the Georgetown University link for IDEAA staff member for the intake meeting. I am

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waiting as agreed to meet at 3 pm EST.

Join Zoom Meeting

<https://georgetown.zoom.us/j/2575759508?pwd=Nnk1Rng3c2ZwZkU4bzBxdHBEBWnNkdz09>

Best regards,

Aleksei

Direct quotation from the email dated July 11th, 2024, from Olabisi Okubadejo (direct quotation):

Dear Aleksei,

I write to acknowledge receipt of the emails that you have sent. IDEAA will be in touch with a substantive response in the coming days, as indicated in Tonya Turner's recent email to you.

Best,

Bisi

Direct quotation from the email dated July 11th, 2024, from Tonya Turner (Rosemary Kilkenny is the supervisor) (direct quotation):

Dear Aleksei,

I wanted to confirm that we have received all of the messages you have sent to our office over the last few weeks, and the external investigator has received those two emails you sent to her as well this week. Please allow us additional time as we prepare responses to your inquiries. Rest assured, we will respond to your messages and questions as soon as possible.

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We appreciate your cooperation and patience."

Any reasonable person will qualify it as laughing and not answering the questions.

My questions are clear and Bisi despite having a week to work on them (since

1. **What is the status as of today for my complaints (all the parts of my complaints regarding all the involved people)? What actions were taken to prevent unlawful disclosure of my private protected information?**
2. **Did you receive 2021-2024 email data and social media messages (WhatsApp, Instagram, LinkedIn, etc.) for the investigation related to the unlawful disclosure of my private protected information?**
3. **I hope there are no issues with disappearance, deletion, "unsending", etc. Emails are the property of Georgetown University. Amazon has special software with records to keep. As people know any destruction of evidence is prohibited and may have very serious legal consequences. Georgetown University was properly notified not to destroy or hide electronic materials.**
4. **What are the legal grounds and authority for the actions for different issues? There were different rules and procedures in 2021-2024 at Georgetown University that regulate IDEAA and its investigations.**
5. **What are the legal grounds for disclosure of my private information to third parties? Do such third parties have rights to practice law in DC? Is it a *pro bono* activity? Are the processes transparent? Did someone (like John, Jim, Jessica, or Jennifer) ask the third party to participate, or was there a tender with the proposal and a fair competition? Has the third party practical experience (e.g. list of cases)**

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with educational law, privacy, emails/social media messages, and other matters?

Can third party guarantee that there are no conflicts of interest and no monetary or other forms of payment/benefits/property/services?

**6. What do I need to do? What is the range of outcomes for the people and the reality?
How can you restore the privacy?**

7. What are the time options available for tomorrow and the next week?

8. Why no one from the Diversity, Equity, and Inclusion team introduced and authorized?

9. Lots of questions and it is fair to have transparency and understanding of the rights and liabilities of all parties involved... Why information is hidden and there are unlawful actions (omission of actions)?

10. I need to understand all the rights and liabilities for each party involved as well as intents, risks, possible issues, and scenarios. Everything must be transparent. When I will receive it?

11. How did the third party receive my personal information? Is it a scam or a fraud?

12. Please email the complaint you are referring to. We need to avoid misunderstandings. As well as have confidence that nothing was lost (as earlier).

13. Why you are not professional?

14. Is someone at IDEAA office accountable and able to answer questions outlined in this and earlier emails?

15. What actions were already taken to prevent the destruction of emails and other materials as well as to prevent additional harm because of disclosures of private protected information and inappropriate actions?

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16. Please share the legal grounds for the involvement of non-members of the community and the forensic team (the suspicious third party from Vermont). What is the authority and the right to do administrative and judicial actions in DC?

17. Please provide selection criteria, tenders, contracts, requests for proposals, and actual offers with proposals regarding the involvement of an unauthorized third party from Vermont State.

Also, I need to see what you have collected so far at Georgetown University and what you have received from me to avoid issues that again information is lost...

lease answer ASAP and stop unlawful activities. Please provide time options for the intake meeting and the meeting with the supervisors."

131. In the bottom line it may look strange that there are many violations of Georgetown Law, MSB, and Georgetown University internal policies and discriminations. In substance the main reasons are national origin (mixed Russian and Jewish roots) and other protected grounds (depending on the type of wrongdoing and episode). We know that during the awful period from 42% to 68% of victims of Auschwitz concentration camp were Jewish blood origin while the remaining victims were Soviet Prisoners of War (SOW)⁴⁰, Polish, Ukrainian, Russian, Roma, and other people. Most of the other perpetrators of the Holocaust denied their involvement and destroyed most or part of the evidence. It is obvious that evil doings at Auschwitz were because of the discrimination of people with Jewish, Russian, Ukrainian, and other blood roots. Even though it was not reflected in the official internal Nazi documents that there is holocaust based on the

⁴⁰ <https://www.auschwitz.org/en/history/categories-of-prisoners/soviet-pows/>

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totality of circumstances and evidence the World received knowledge about the truth⁴¹ including the Nurnberg trial. Internally Nazi presumed that Jewish people had no chances to survive. Therefore, at the concentration camp selected prisoners were not doing anything else other than burning photograph albums but were storing tons of glasses and shoes for new owners. Some Nazi even relocated partially to Argentina, Chile, Brazil, Canada, and other countries. Same with Georgetown University, admins can try to persuade or convince that systematic mistakes are not related to a group of similarly situated people and either there are no mistakes or not cause by belonging to national origin group or other protected category. However, based on science (Math) we know that the probability of having 111111 in the lottery ticket is extremely low. We had 250 full MBA students in 4 cohorts and about 100 LL.M in Taxation students. What is the probability that systematically there are dozens of random nondiscrimination mistakes and wrongdoings against 1 student that belongs simultaneously to several protected groups? The probability of such event is zero (or *approaches to zero* like mathematicians say). No other students started 2 programs simultaneously for no reason other than to improve Georgetown University statistics and numbers to receive more federal funds. The different treatment and hostile environment were because of my diverse national origin and other grounds (race, color, age) because there were no other reasons for the outlined above examples. That was the reason why instead of basic principles of finance and professional advanced tax courses for experienced LL.M students I was forced to join junior JDs in 4 credit course "Federal Income Taxation" where classes are canceled and not rescheduled during the whole Semester and the professor was not able to answer the questions neither during the classes nor during office hours or emails and transfers questions to others (because she had limited experience in that particular course subject) but again with no answers. Because of

⁴¹ <https://www.history.com/news/auschwitz-liberation-soviets-holocaust>

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mistakes there were adverse implications for New York Bar admission. Moreover, Ellis Duncan communicated in an insulting manner with *highly-tighty* language. Overall treatment at Georgetown University was as with 2nd sort humans while students with Russian origin are systematically treated differently and receive smaller scholarships and grants. The real motivating factor for differential treatment was the discrimination based on national origin and other grounds. For instance, Georgetown Law Constitutional law professor explained me the following: *"...the difference in treatment of Japanese Americans and German Americans during World War II raises important issues. The majority in Korematsu v. United States, 323 U.S. 214 (1944) argued that Japanese Americans were not sent to internment camps because of their race but because of the fact that the U.S. was at war with Japan. The dissents argued powerfully that the real motivating factor behind the decision was racism. In Trump v. Hawaii from a couple of terms ago, Chief Justice Roberts recognized that Korematsu had been overruled by "the court of history" and that the forcible segregation of people on the basis of race is unconstitutional."*

132. The fiduciary duty as well as Fair Dealing standards and good faith requirements were breached by Georgetown University based on the totality of circumstances and all examples provided in the Complaint. Duty of loyalty and care seems do not exist for Georgetown University that is only interested in the extraction of maximum cash flows despite double counting and non-suitability of simultaneous programs since it creates a clear deprivation of rights and opportunities. Numerous internal Georgetown University policies that were designed to protect from discrimination, wrongdoings and harassment were not applied to me because of differential treatment and shared ancestry.

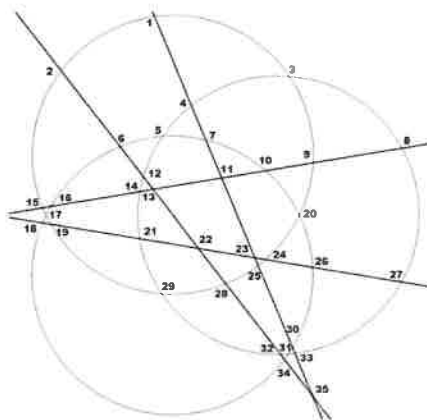
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**A. Title VI Protects Russian and Jewish Students Against Among Other Things
Russophobia and Antisemitism, As Well As Discrimination On Other Grounds**

Title VI prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives federal funding or other federal financial assistance, and protects all students, including Jewish and Israeli students, in such programs or activities.

Based on the examples I was systematically targeted and offended because of my national origin, shared ancestry, there was harassment and discrimination based on national origin and other grounds. My complaints were not properly investigated. My requests to Georgetown University officials were ignored systematically.

There are many different examples of violations that happened at Georgetown University, and they fall not only with Title VI scope because of the discrimination and differential treatment based on national origin and other grounds (depending on the example and episode) but overlap with other areas of law such as different torts, privacy, employment, contract, and other areas of law. Please see an illustration of the intersection (just a picture):



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137. As you see based on the outlined above examples both MSB and Georgetown Law have failed to take meaningful steps to address hostile discriminatory Russophobia and antisemitic climate, end the harassment, and create a safe environment. Michael Firsch, Diversity Equity and Inclusion office, numerous deans from Georgetown University and senior management did not investigate the issues, refused to meet and listen for periods like half year, disregarded complaints.

138. Specifically, Russian and Jewish students, among other things, have faced antisemitic and Russophobia harassment, have had classes and other educational opportunities disrupted, have been prevented from moving about freely on campus. Students suffered injuries including deprivation of one or more of their rights or privileges guaranteed by the Constitution and laws, medical injuries, severe emotional distress, suffered from deep humiliation resulting in a severe panic attack, and lost trust in GU propaganda and marketing. As you see from examples there are death threats because of national origin and GU does not react to them while the deans and numerous admin people laugh and refuse to meet and listen.

139. Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. 2000d⁴² et seq., prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving Federal financial assistance.

140. In accordance with the section "Commitments and Contingent Liabilities" of the Georgetown University US GAAP financial statements the University receives a substantial amount of its revenues from U.S. Government grants and contracts. The ultimate determination of amounts received under these programs generally is based upon allowable costs, which are subject to audit, and are reported to the U.S. Government. Recovery of indirect costs is based on

⁴² Direct quotation: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

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predetermined rates negotiated with the government. The University is of the opinion that adjustments, if any, arising from such audits will not have a material effect on the financial statements.

141. Georgetown Law, and MSB, has knowingly allowed a hostile environment to develop and flourish in violation of Title VI. A. Title VI protects Jewish and Israeli students who are targeted on the basis of their national origin and shared ancestry. Title VI requires educational institutions that receive federal funding to prevent discrimination and harassment that generates a hostile environment against students on the basis of their race, color and national origin.

142. For purposes of Title VI, harassment creates a "hostile environment" when, based on the totality of the circumstances, the harassment "is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the recipient's education program or activity. Georgetown University for years ignored the complaints.

143. Harassing, marginalizing, demonizing, and excluding students with Russian, Jewish, and Ukrainian roots is unlawful and discriminatory. There was bullying and harassment. Despite having complaints Georgetown University did not provide additional services to the student who was harassed in order to address the effects of the harassment, particularly if the school initially delays in responding or responds inappropriately or inadequately to information about harassment.

144. To establish a violation of Title VI under the hostile environment theory, Office of Civil Rights finds that a hostile environment based on national origin existed, the University had actual or constructive notice of a hostile environment based on national origin, and the University failed to take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effects, and prevent the harassment from recurring. Harassing

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conduct may take many forms, including verbal acts and name-calling, graphic and written statements, which may include use of cell phones or the Internet, other conduct that may be physically threatening, harmful, or humiliating. Harassment creates a hostile environment when the conduct is sufficiently severe, pervasive, or persistent so as to interfere with or limit a student's ability to participate in or benefit from the services, activities, or opportunities offered by a school. Unwelcome conduct based on shared ancestry or ethnic characteristics that, based on the totality of circumstances, is subjectively and objectively offensive creates a hostile environment. Once a recipient has actual or constructive notice, the recipient has a legal duty to take immediate steps to eliminate it and prevent it from recurring. The appropriate response to a hostile environment based on national origin must be tailored to redress fully the specific problems experienced at the school as a result of the harassment. The harassment included verbal and written acts by so called "professors" and students, including verbal and graphic and written actions. Severe and pervasive harassment is not confined to verbal and written attacks, but includes unwelcome conduct based on shared ancestry or ethnic characteristics that, based on the totality of circumstances, is subjectively and objectively offensive. Under the "totality of the circumstances," the verbal and non-verbal acts of harassment and bullying (see the examples) have created a hostile environment that leaves students with Russian and Jewish roots feeling marginalized, attacked, frightened, and alienated to the point where many feel compelled to hide the identity. It objectively limits the abilities to participate in or benefit from the services, activities, or opportunities offered by a University. Because of suffering from continual intimidation and harassment I was unable to focus based on my abilities on the studies and benefit from the education.

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145. As you see from the examples, I was deprived of education, employment, and other opportunities. While other students were able to fully enjoy such luxuries, I suffered a lot... My abilities to extract value and perform based on my abilities were limited because of hostile climate.

146. There are numerous published and shared examples of incidents with discrimination. It is obvious for any rational and educated person that Georgetown University made many violations. For instance, when we speak about Episode # 13 from examples (red tie traditional color) it is like a movie instruction for the guideline sample: *A foreign student who is a member of a renowned debate team at a university wears a traditional headscarf. She reports to the faculty head of the debate team that other students on the debate team have harassed her, called her derogatory names, put threatening notes on her debate binder, and told her she must either quit the team or not wear her headscarf because it will "be distracting for the judges" or "make her seem too foreign." The faculty member shrugs it off and takes no steps to address the issue and the student decides to quit debate. The university receives funding from DHS for its Science and Technology research programs.*

147. A recipient violates Title VI if it retaliates against a private individual who opposes a discriminatory action or participates in a matter alleging discrimination whether the underlying matter concerns intentional discrimination or disparate impact. This is completely not appropriate to create threats and false rumors, limit the time at the exam and disclose private confidential information to the students, professors, administrators, and potential employers during meetings... Georgetown University violated fiduciary duty and didn't act in good faith, I was treated dramatically different from other graduate students because of national origin. A hostile environment and differential treatment exist for many years.

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148. Georgetown University's Double Standard in Addressing Russophobia and Antisemitism. Georgetown University has failed to investigate and address the Russophobia and antisemitic incidents (see examples described above), even though such incidents violate numerous provisions of Georgetown University's policies and applicable authority. There is no freedom of speech, for instance it was prohibited to speak on campus for many classes (see above) while Georgetown University allows to make on me hate speech, discrimination, and harassment. No one cares about *SUCKS* language, threats to burn like in tank, and other discriminations and harassments against a graduate student with Russian-Jewish origin while there are dramatically different consequences for the faculty and students with respect to Asian or Afro-American slur language and discriminations. I thought opportunities were equal. For instance, on February 24th, 2022, there was email from GU official Fr. Marc Bosco with special treatment and support for students without Russian and Jewish roots, in particular: "We have reached out directly to our Ukrainian students to offer our support and solidarity. We have several resources available to assist affected community members."

149. The acts and omissions of Georgetown University and its administrators have subjected me to discrimination on the basis of actual and/or perceived Russian and Jewish shared ancestry, race, ethnic characteristics, and/or national origin.

150. Georgetown University and its administrators had actual notice that harassment, over which Georgetown University had substantial control and the authority to remediate, was so severe, pervasive, and objectively offensive that it created a hostile environment based on shared Jewish ancestry and ethnicity that deprived plaintiffs of full access to Georgetown University's educational programs, activities, and opportunities.

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151. Georgetown University and its administrators have intentionally discriminated against me because of actual and/or perceived Russian and/or Jewish ancestry, race or ethnic characteristics, or national origin, as exhibited by deliberate indifference to the abuse, harassment, and intimidation of me in violation of Title VI. Specifically, Georgetown University and its administrators failed to cure or otherwise adequately, appropriately, and meaningfully address, ameliorate, or remedy the discrimination against me, and the hostile environment that students with Russian and/or Jewish roots are forced to endure at Georgetown University. Such unlawful deliberate indifference caused plaintiffs to be subjected to a hostile educational environment.

152. The environment at Georgetown University, which has been rendered hostile as a result of my Russian and/or Jewish roots and ancestry, is sufficiently severe, pervasive, persistent, and offensive such that it has deprived me of equal access to the educational and employment opportunities and benefits that Georgetown University provides to other students.

153. Georgetown University and its administrators have actively and intentionally engaged in this pattern of severe and/or pervasive discrimination. Using the science and the math language the probability of unintentional negligence approaches zero since there are more than 10 episodes and inappropriate actions (omission of action) continued after graduation.

154. Georgetown University and its administrators also directly and intentionally discriminated against me, with my actual or perceived shared ancestry or ethnic characteristics a substantial or motivating factor in Georgetown University's actions.

155. Georgetown University has failed to act appropriately. Georgetown University's violations of Title VI were the actual, direct and proximate causes of injuries and damages. As a result, I have suffered, and continue to suffer, substantial damages.

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156. Georgetown University and its divisions are prohibited from discriminating against or permitting the harassment of students by reason of their actual or perceived race, religion, or national origin. I have been excluded from participation in and have been denied the full benefits of Georgetown University's educational, employment services, and other programs and facilities based on my national origin. As a result of Georgetown University and its administrators' actions, inactions and conduct described herein, students with Russia and/or Jewish roots were treated differently compared to similarly situated other students.

157. Georgetown University and its administrators have permitted severe and pervasive harassment, abuse, and intimidation of, and discrimination against me on the basis of race, age, and national origin, by other Georgetown University students, faculty members, officials, and staff. As a result of Georgetown University and its administrators' deliberate indifference, I have been denied the full benefits and use of Georgetown University's educational and employment opportunities and amenities.

158. Georgetown University and its administrators have failed to cure or otherwise adequately, appropriately, and meaningfully address, ameliorate, or remedy the discrimination and the hostile environment that students like me are forced to endure.

159. The hostile environment at Georgetown University is sufficiently severe, persistent, and pervasive that it can be said to deprive students with Russian and/or Jewish roots of equal access to the educational opportunities and benefits provided by Georgetown University.

160. Georgetown University has not acted in accordance with, and has not followed through on, its statements against discrimination, abuse, and harassment, and has instead knowingly engaged in the false acts or practices that are deceptive or misleading in a material way,

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that were aimed at the consumer public (i.e. students), and that were likely to mislead a reasonable student acting reasonably under the circumstances. Same with the promises to help with employment opportunities and other rights (denial of benefits). Georgetown University acted against the interests of the selected student breaching the duties of good faith, loyalty, care, and fair dealing. The reasons for such conduct were discrimination on different grounds. It is impossible to fool people, people can see the truth and when there is discrimination.

161. By falsely causing me to believe that if students pay fees Georgetown University, then GU and its schools would uphold, adhere to, abide by, and comply with its stated rules and policies, and the commitments contained therein, to foster, ensure, maintain, and create an environment free of discrimination, abuse, harassment, and intimidation, and provide an adequate and appropriate setting and environment in which all students, of whatever ancestry, race, ethnic characteristics, religion, national origin, citizenship, or immigration status (as well as other protected grounds) could freely express their identity and ancestry, could learn and grow, and could participate fully and meaningfully in Georgetown University's educational, employment, and other programs. GU people in contrast acted against me and created numerous conflicts of interest while at the same time boosted tuition and fee revenue.

162. Georgetown University and its administrators also directly discriminated against me based, *inter alia*, on actual or perceived race, age, or national origin and other grounds.

163. Georgetown University's actions or conduct had, and continue to have, a differential or disparate impact.

164. In applying its policies, Georgetown University and its administrators failed to act or acted with leniency and/or delay when a known or reported incident involved Russophobia and/or

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antisemitism or the victim was a student with Russian and/or Jewish roots. Discrimination, based on my actual or perceived shared ancestry, race or ethnic characteristics was a substantial or motivating factor in Georgetown University's actions.

165. I am and identify as Russian and Jewish because I have diverse national origin.

166. I want to believe that there are fundamental civil rights protections for students, including students who face discrimination and harassment at school based on national origin or creed.

167. It was not allowed to participate in the employment opportunities (see example with TIP above and non-willingness of graduate career center to help with employment because "*we are not a placement agency*"). It was not allowed to enjoy special educational opportunities with trips to Europe because such options were hidden by my advisor. There were mistakes in academic advising. I was like a 2nd class citizen within the Georgetown University community.

168. I have been robbed of my graduate study experience. The University must compensate for the hostility I have been forced to endure as a consequence of Georgetown University's unlawful conduct.

169. Georgetown University made false representations and promises to me while I relied on them when enrolled and paid above average tuition compared to other graduate students.

There are different Georgetown University, Georgetown University McDonough School of Business, and Georgetown University Law policies that were not applied or were applied selectively.

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As you see there were many incidents when I was bullied and harassed, excluded from certain opportunities because of my national origin and other grounds. People were aware that I have Russian and Jewish national origin, I have specific accent and name, and too some extent limited English proficiency. There were no other reasons for numerous incidents, inappropriate actions, omission of action, and systematic intentional mistakes. There was no insult, mistakes, dehumanization, breach of confidentiality, and other wrongdoings against other students. Direct causation of troubles is my national origin. There were threats to my life and career, I was targeted and had a fear for my life. For example, inappropriate **"sucks" language with respect to my national origin (either in sexual or non-sexual meaning) from a so-called "professor" or a burn like in tank commination from student in response to a BM festival information** (like October 7th attack) and other threats to my life... Disallowance to wear national color tie and removal of Rule of Law from the slide. Even highly ranked officials like Georgetown Law deans were indifferent to the wrongdoings and failed to take appropriate actions (while it was requested for many months to meet and resolve). They refused to meet and to listen while other students were treated differently, not discriminated.

177. Georgetown University campuses became viciously **hostile environments for Russian and Jewish students**. In recent years Georgetown University suffered many times because of racist and corruption scandals. Based on the outlined above examples there was and there is a suppression of my civic rights because based on shared ancestry and my national origin. As you see in the episodes there was a differential treatment.

Georgetown University has violated Title VI of the Civil Rights Act of 1964, breached its duties it agreed to protect, and made plain that the representations and promises it made to me (on which I relied in enrolling) were false. Faced with pleas for help and protection, fearing for safety

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and unable to escape relentless harassment, Georgetown University has continued to do nothing and created larger problems with failures to protect private information. In fact, shockingly, Georgetown University has done the opposite—it has deliberately ignored the complaints and requests to meet to receive protection, made leaks of protected private data, and made the environment even more hostile and toxic.

181. Fearing for lives and sickened by the virulent hate speech that is part of their daily life at college, I tried to reach for almost eternity out for help from GU numerous times in 2021-2024, including from, among others: IDEEA office (Diversity, Equity & Inclusion office), Ellis Duncan, Tiffany Joly, Madhavi Sunder, Sunita S. Iyer, Caroline T. Springer, William Treanor, executive body of GU and Board of Directors (through secretaries), Michael Frisch, deans and administrators of McDonough School of Business. Rather than implementing urgently needed protective and disciplinary measures to restore campus order and safety, to solve the problems and correct the mistakes, stop wrongdoings and provide feasible solutions, these administrators and bureaucrats gaslighted me, insisting that my fears were exaggerated and that they didn't make the mistakes, while that was not true and a lie.

182. As a result of Georgetown University's brazen disregard for its obligations to protect its students like Aleksei, they have suffered severe injury to themselves and their educational experience. I was targeted with verbal and physical threats, and Georgetown University made me feel unsafe on campus. No student should be forced to endure such outrageous, demoralizing, and life-threatening treatment anywhere. I was deprived of the benefits that those other students enjoy at Georgetown University and was forced to pay higher total tuition (compared to other students based on statistics because my scholarships were smaller).

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183. The Russophobia and antisemitic events and incidents described above (examples) have devastated my ability to participate in Georgetown University's educational, employment, and other programs. Georgetown University's actions and inactions concerning abuse, intimidation, harassment, and discrimination, have created and fostered a hostile environment that has traumatized me and made my life at Georgetown University unbearable.

184. Despite all the dehumanization instances and based on some of the facts (partially outlined above) and reasons, I kindly request the Office of Civil and Human Rights to initiate an unbiased investigation of Georgetown University (including but not limited to its divisions: Georgetown Law and MSB), a recipient of federal funding, for violations of Title VI and the statute's implementing regulations. I understand that there are about a hundred of ongoing investigations, but we must see Justice and hypocrisy, double standards, incompetence, dishonesty, misinformation, and fraud must properly investigated in the symbolic heart of the United States. Thus, for all the above-mentioned reasons, I urge Office of Civil Rights to investigate the compliance with Title VI of the Civil Rights Act of 1964.

185. It may look like Georgetown University made many systematic mistakes that are not related to a standard group of similarly situated people. As you see in the complaint there are routine and non-routine violations. Georgetown University can try to explain/convince/persuade that either there are no mistakes or they are not caused by belonging to a national origin group or other protected category. However, based on science (Math) we know that the probability of having something like 111111 in the lottery ticket is extremely low. We had 250 full MBA students in 4 cohorts and about 100 LL.M in Taxation students at Georgetown Law in 2020-2023. What is the probability that systematically there are dozens of random mistakes and wrongdoings against 1 student with Russian-Jewish roots (that belongs simultaneously to several protected groups) or

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Russian students or Jewish students? Any rational and reasonable person will say that the probability of such an event is zero. Based on the holistic helicopter view and the totality of circumstances there are violations because of discrimination. Some issues overlap with different areas of law but it is beyond reasonable doubt that there are simultaneously discrimination and multiple other violations.

COUNT II

Chapter 14 of the Code of the District of Columbia – Human Rights (§ 2–1401.01 et seq.).

I repeat and reallege the allegations of the preceding paragraphs and the Facts section as though fully set forth herein.

Educational institutions like Georgetown University are prohibited, under Chapter 14 of the Code of the District of Columbia (§ 2–1401.01 et seq.), from discriminating against or permitting the harassment of students, even in part because of their actual or perceived religion, race, color, marital status, sexual orientation, national origin, sex, age, personal appearance, political affiliation, matriculation, source of income, genetic information and others.

I am and identify as Russian and Jewish male of above average age at the educational institution with a non-traditional personal appearance, and my status and such identification brings me within the scope of Chapter 14 of the Code of the District of Columbia protections.

Every individual shall have an equal opportunity to participate fully in the economic, cultural and intellectual life of the District and to have an equal opportunity to participate in all aspects of life, including, but not limited to, in employment, in places of public accommodation, resort or

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amusement, in educational institutions, in public service, and in housing and commercial space accommodations. § 2–1402.01. "Unlawful discriminatory practice" includes harassment engaged in for discriminatory reasons specified in § 2-1402.11(a). § 2–1401.01.

Pursuant to § 2–1402.41 it is an unlawful discriminatory practice for an educational institution:

(1) To deny, restrict, or to abridge or condition the use of, or access to, any of its facilities, services, programs, or benefits of any program or activity to any person otherwise qualified, wholly or partially, for a discriminatory reason, based upon the actual or perceived: race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, political affiliation, source of income, disability, or homeless status of any individual; or

(2) To make or use a written or oral inquiry, or form of application for admission, that elicits or attempts to elicit information, or to make or keep a record, concerning the race, color, religion, or national origin of an applicant for admission, except as permitted by regulations of the Office.

COUNT III

(42 U.S.C. § 1986)

I repeat and reallege the allegations of all the preceding paragraphs above as though fully set forth herein.

Jews and Russians are a protected class for purposes of 42 U.S.C. § 1985.

"Injustice anywhere is a threat to justice everywhere"

Martin Luther King

Certain Georgetown University students, admin people staff, and faculty, as well as others, including, but not limited to, those mentioned above, engaged in an anti-civil rights conspiracy within the meaning of 42 U.S.C. § 1985(3) which was antisemitic and/or russophobic threatening, deprivation of rights and property (including various educational and employment opportunities as well as benefits) and which created a hostile and discriminatory environment for me based on different grounds.

The Co-Conspirators plotted and executed a common plan, with an agreement and understanding, to engage in, promote, and incite harassment, threats, inappropriate actions (as well as omission of action), deprivation of rights and opportunities, and intimidation against Jewish and Russian national origin members of the Georgetown University community, including me.

This meeting of the minds is evidenced in the close collaboration among them, and their co-organization, co-sponsorship, and/or co-promotion of different actions (as well as omission(s) of action(s)), as described above. The Co-Conspirators include individuals such as Georgetown University students, staff, admins, faculty, and other people not directly affiliated with Georgetown University. Additional co-conspirators whose identities are not known committed numerous additional acts in furtherance of the conspiracy to violate my rights, including those alleged herein.

In furtherance of a conspiracy to violate the rights of Jewish and Russian national origin students the Co-Conspirators committed numerous overt acts designed to create an environment of intimidation, harassment, and hostility for the purpose of depriving them of their constitutional rights to the equal protection of the laws and their equal enjoyment of the privileges and immunities that are, *inter alia*, guaranteed by the Constitution of the U.S.A. and applicable laws, and to the full and equal benefit of the laws and proceedings for the security of persons, including those under

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42 U.S.C. §§ 1981 and 1982, the Thirteenth Amendment right to be free from racial violence, because of the national origin, race, ethnicity, and/or religion.

The actions of the Co-Conspirators violated 42 U.S.C. § 1985(3).

I am setting forth the conspiracy and its particulars as the basis for the claim against Georgetown University brought pursuant to 42 U.S.C. § 1986, which requires an underlying violation of 42 U.S.C. § 1985.

Georgetown University possessed actual knowledge of the Section 1985(3) anti-civil rights conspiracy described in the Complaint that was planned and undertaken against me.

This knowledge came, *inter alia*, through multiple reports and emails, requests for the meetings and clarifications, to Georgetown University's administration and others. I repeatedly begged and pleaded with Georgetown University, but Georgetown University refused to help and instead placed the burden on Jewish and Israeli students to keep themselves safe.

Georgetown University had advance knowledge of the Section 1985 violations.

Georgetown University has direct oversight and disciplinary power over the students, faculty, and groups of the same who committed the Section 1985 violations.

Although Georgetown University had the power to intervene and prevent violations of my civil rights, Georgetown University neglected and/or refused to prevent or aid in preventing the commission of this conspiracy or any of the overt acts committed in furtherance of the conspiracy so as to stop the above-described injuries that occurred to me since I was the target of the anti-civil rights conspiracy.

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I suffered the injuries as a result of Georgetown University's failure to stop the described conspiracy.

Other claims based on supplemental jurisdiction over plaintiff's various related state-law claims under 28 U.S.C. § 1367(a) because those claims arise out of the same case or controversy as the federal claim. In particular: Columbia District privacy torts, breach of contract, premises liability, misrepresentation, § 28–3904 of DC Code (unfair or deceptive trade practices) § 31–2231.04, etc.

VIOLATIONS

Title VI of the Civil Rights Act of 1964 and a supplemental jurisdiction over plaintiff's various related state-law claims under 28 U.S.C. § 1367(a) because those claims arise out of the same case or controversy as plaintiff's federal claim. Grounds for other claims on supplemental jurisdiction: Chapter 14 of the Code of the DC (human rights § 2–1401.01 et seq.), DC privacy torts, Breach of contract, Misrepresentation, § 28–3904 of DC Code (unfair or deceptive trade practices) § 31–2231.04, 42 U.S.C. § 1986, and others.

JURY TRIAL DEMANDED

Plaintiff hereby demand a jury trial for all issues so triable.

PRAYER FOR RELIEF

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WHEREFORE, plaintiff pray and request that a judgment be entered in my favor, and against Georgetown University:

- A. Compensatory, consequential, and punitive damages in amounts to be determined at trial;
- B. Statutory penalties, including treble damages;
- C. Reasonable attorneys' fees, the costs of suit, and expenses;
- D. Pre-judgment interest and post-judgment interest at the maximum rate allowable by the law;
- E. Correction of mistakes in the transcripts; and
- F. Such other and further relief as the Court deems just and proper.

Aleksei Klusov

A handwritten signature in black ink, appearing to read 'Aleksei Klusov', with a long, sweeping horizontal stroke extending to the right.