

First attempt: On August 27, 2007, a draft of my termination letter by Cary Groth contained the following language:

If you are wanting to be on campus..., you are to notify the Athletic Director...for approval prior to your arrival.

Second attempt: On October 3, 2007, then-interim Soccer Coach Antoinette Marjanovic conspired with Executive Associate Athletic Director Cindy Fox to solicit *manufactured* complaints from student-athletes so they could ban me from campus:

In the Fall of 2007, I [student-athlete's name redacted] was contacted by a UNR athletic department employee [Antoinette Marjanovic]. She asked me if I would send in a written complaint about Terri Patraw. The employee said that Cindy Fox stopped in her office and said **if you can get the student athletes to write complaints** that Terri's presence makes them uncomfortable **we can use those statements to get her banned from campus.**

Third attempt: On October 17, 2007, UNR General Counsel Mary Dugan sent a settlement offer to my then-counsel Marc Picker. The offer contained the following:

No appearance on campus

Fourth attempt: On December 17, 2007, after previous attempts failed, Marjanovic and Assistant Soccer Coach Graeme Abel filed a false incident report against me with the UNR Police Department (UNRPD). Both had received temporary promotions due to my termination and were fighting for their future job prospects at UNR. At the time they filed the false report, Marjanovic was attempting to secure an interview for the Head Soccer Coaching position. The 2007 soccer team had an unsuccessful season under her leadership and this was her chance to please the administration. **Two days** after she filed

this report she received an interview for the head position.

According to a witness who testified *under oath*:

Q Did Nettie [Antoinette Marjanovic] say that they wanted to ban Ms. Patraw from campus?

A **I had heard Nettie and Graeme [Abel] talking about trying to get Terri banned from campus, yes.**

Q Okay. And so you can't tell us whether this declaration accurately reflects that phone call or not, can you?

A **...She [Marjanovic] had told me at one point that they were trying to get Terri banned**, so I don't remember if that phone call specifically said, If you write this down, we can get her banned.

The false reports reveal conflicting accounts to what is *alleged* to have occurred:

According to Abel's account:

Miss Marjanovic and I continued to **walk towards the exit** without response. Ms. Patraw then stepped towards Miss Marjanovic and **placed her hands around** Miss Marjanovic's shoulder and neck and pulled Miss Marjanovic towards her. Miss Marjanovic . . . said "**Get your fucking hands off me**"

According to Marjanovic's account:

We were **walking back to the arena** . . . I felt a **hand and arm** grab me around my shoulder/neck area trying to yank me back. It was Terri Patraw and I told her "**don't fucking touch me**" and pulled away while continuing to walk back to the main court . . . **Marjanovic feels that if the University does not issue a trespass to Patraw**, she may then pursue the TPO . . .

Comparison of Marjanovic's statement to Abel's shows contradicting statements.

Abel and Marjanovic could not have been telling the truth. *Were they walking back to the arena or towards the exit? Was it two hands or an arm and hand? Which of the two vulgar*

statements did Marjanovic actually utter? It is clear that at least one of them is lying *under oath*. If the *alleged* incident is serious enough to file an incident report, *why didn't Abel and Marjanovic press charges?* Their motive was to please the administration and to achieve their goal of banning me from campus. Marjanovic even stated this goal in her report.

UNRPD never contacted me to verify the validity of this report. I knew nothing about this report until UNR General Counsel submitted this *manufactured evidence* in discovery for my lawsuit 6 months later. To prove that these allegations are false, I requested the video records of this *alleged* incident via UNR's extensive video surveillance system. UNR General Counsel admitted it cannot produce it, because it did not happen.

Marjanovic and Abel were directed by the UNR administration to file this incident report. **UNR lawyers admitted this in a recent court hearing.** This is the same *modus operandi* used for the incident report that Groth filed on me at the whistleblower hearing; where UNR General Counsel directed the filing of a similar report. Groth also did not want to press charges. Not so surprisingly, we have a third such *manufactured* incident report that Cindy Fox filed on me. Same *modus operandi* that was run through the UNR General Counsel's office. She too did not want to press charges! Unbelievable that they just all felt compelled to tell someone at the UNRPD days after these *alleged* incidents. Once again, to prove that all of these incident reports are false, I requested the video records of these *alleged* incidents. Once again UNR General Counsel admitted it cannot produce this evidence.

On December 15, 2008 I filed a criminal complaint with the UNRPD against Marjanovic, Abel, Fox and Groth for filing false incident reports against me. I offered to

take a polygraph test to prove that these individuals were all lying in their reports. While admitting it was a viable option, UNRPD did not take me up on this offer.

President Glick has admitted *under oath* that he is aware that I filed a criminal complaint against these individuals for their false reports. Yet, he has not released my ban from campus. Interestingly enough, the subsequent UNRPD investigation revealed that Marjanovic contradicted her first report in her recent interview with Officer Warren Conley. Cindy Fox too contradicted her original report and Abel “cannot remember but he thinks...”

On December 19, 2007, two days after UNR General Counsel secured the manufactured evidence from Abel and Marjanovic, Glick banned me from campus:

I am withdrawing consent for you to be on campus...I take this action to protect life, limb and property...Your presence on campus as of this date will constitute trespass.

To further harass me, Glick sent UNRPD outside its jurisdiction to deliver his illegal ban to my home. Glick cited the NSHE Code (6.5.1 and 6.18) to support the ban. However, the Code provisions cited do not apply to me. **Code 6.5.1** refers to employees on Administrative Leave. **Code 6.18** allows the President to direct a person to leave the campus if they engage in prohibited conduct. UNR has not produced any *true* evidence that I had engaged in prohibited conduct. Even if they had, the Code does not authorize the UNR President to permanently ban a citizen from the public campus. It simply allows the President to direct a citizen to leave the premises if prohibited conduct is established.

If Glick’s justification (“to protect life, limb and property”) was truthful, he would have banned other employees and students who have engaged in actions that endanger life, limb, and property. For example, Head Basketball Coach Mark Fox **repeatedly**

vandalized UNR property in Lawlor Events Center due to his uncontrollable temper. UNR basketball player Brandon Fields **physically assaulted his girlfriend**, a UNR female athlete. The female athlete left the team in mid-season, quit school, and had to re-start her life out of state. Former **Golf Coach Rich Merritt also physically hit one of his student-athletes**. Glick did not ban these individuals from campus. He knowingly singled me out as retaliation for blowing the whistle on corruption in the UNR athletic department.

On June 12, 2008, I addressed you, the Board of Regents, in the presence of Glick:

Chancellor Rogers and the Board of Regents, I respectfully ask for a release of my ban from campus. President Glick is in violations of the law by this Abuse of Power and Oppression Under the Color of Office. **By banning me and issuing a false and defamatory statement from his office that I was involved in an incident on campus, President Glick has exposed NSHE to further liability.**

To date, I have not received a response.

On November 24, 2008, my lawyer wrote a letter to Charles Hilsabeck:

It is time for President Glick to call off the ban against Terri Patraw from UNR campus. On August 11, 2008, you forwarded to Wayne Fazzino sections of the NSHE Handbook, in particular from the Code, Chapter 6.5.1 and 6.18, which your client contends support the ban. **Please provide an explanation for how President Glick believes that a ban is authorized under one or both of these provisions, because my client and I do not see it.**

To date, there has been no response.

All exhibits/evidence are available to you upon request. UNR General Counsel will likely alter the evidence if you request it through them.