

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

FEPA
 EEOC

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Dr. Johnson Varkey

Home Phone (Incl. Area Code)

Date of Birth

Street Address

City, State and ZIP Code

San Antonio, TX

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

St. Philip's College

No. Employees, Members

501+

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

1801 Martin Luther King Dr.

San Antonio, TX 78203

Name

Alamo Colleges District

No. Employees, Members

6,000+

Phone No. (Include Area Code)

210-212-5266

Street Address

City, State and ZIP Code

2222 N. Alamo St

San Antonio, TX 78215

DISCRIMINATION BASED ON (Check appropriate box(es).)

RACE COLOR SEX RELIGION NATIONAL ORIGIN
 RETALIATION AGE DISABILITY GENETIC INFORMATION
 OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

1-12-23

1-27-23

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Please see attached statement of Dr. Johnson Varkey.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

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

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

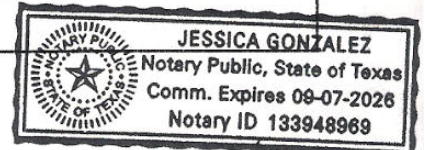
SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

(month, day, year) 07/21/2023

7-21-23

Date

Charging Party Signature



St. Philip's College discriminated against me in violation of Title VII and the Texas Commission on Human Rights Act (TCHRA), when it terminated me because of my Christian beliefs and my statements in class that reflect my study of biology and my religious beliefs.

Background

During my nineteen-year employment as a biology professor at St. Philip's College, I consistently received exemplary performance reviews and was never once subject to discipline. *See, e.g.*, Ex. A (Fall 2021 performance review). In my role as an adjunct professor, I taught Human Anatomy and Physiology to more than 1,500 students since 2004. As my performance reviews suggest, I gladly taught students of all beliefs and backgrounds. Throughout my employment, I never discussed with any student my personal views—religious or otherwise—on human gender or sexuality.

During my lecture on the human reproductive system, I stated that human sex is determined by chromosomes X and Y, and that reproduction must occur between a male and a female to continue the human species. I also explained that when a sperm (which has 23 chromosomes) joins with an egg (which also has 23 chromosomes), a zygote (which has 46 chromosomes) is formed, and it begins to divide, and after 38 weeks a baby is born. Because no information is added or deleted in those 38 weeks, life starts when the zygote begins to divide, not when the baby is born. In the course of teaching Human Anatomy and Physiology, I made these statements in every class for 19 years, without any incident or complaint. The slides that I used to teach these concepts in class, which are from the college-approved textbook I use, are attached as Exhibit B.

On November 28, 2022, four students walked out of my class when I stated, consistent with my study of human biology and my religious beliefs, that sex was determined by chromosomes X and Y. Although St. Philip's College refused to explain any details about the "complaints" directed toward me, I presume that the complaints came from these students. In two decades of teaching these basic, unremarkable concepts, no other students have ever complained.

On January 12, 2023, I received the following email from Randall Dawson, Vice President for Academic Success at St. Philip's College, enclosed as Exhibit C.

I am sending you notification that Alamo Colleges District Human Resources department is in receipt of an ethics violation complaint from JBSA-Lackland, related to your facilitation of the BIOL 2402 class, during the Flex II Fall 2022 term. On January 10, 2023, JBSA-Lackland's Chief, Education & Training and the Installation Commander Delegate for Education Oversight revoked your access to all JBSA installations, pending the outcome of the investigation.

I responded promptly and respectfully, asking, "What was the complaint? I am not aware of any violations that I committed. Please clarify. Thank you." I received no substantive response, only a statement that "[a]ny further communication regarding this matter will be addressed through our Human Resources department."

On January 27, 2023, I received a Notice of Discipline and Termination of Employment and Contract letter. The letter, which is enclosed as Exhibit D, claimed:

St. Philip's College has received numerous complaints that were submitted to Joint Base San Antonio Training and Education regarding your classroom behavior while facilitating in an official teaching capacity on JBSA-Lackland last semester, which is found to be unacceptable. The complaint contained several reports of "religious preaching, discriminatory comments about homosexuals and transgender individuals, anti-abortion rhetoric, and misogynistic banter." While some of the subject matter may be connected to class content, it was very clear, from the complaints, that you pushed beyond the bounds of academic freedom with your personal opinions that were offensive to many individuals in the classroom.

In addition, the letter claimed that I had violated Section D.4.10.1 of the Faculty Code of Professional Ethics, thus accusing me of violating "the highest standards of **academic honesty and integrity**." Ex. D (emphasis in original). St. Philip's College provided no explanation or reasoning for its accusation.

My Religious Beliefs

I am a devout Christian. My wife and I are volunteer associate pastors at International Bible Church in San Antonio. As an evangelical Christian, I believe that God created humankind male and female, that one's sex is ordained by God, that one should love and care for the body that God gave him or her, and that one should not attempt to erase or alter his or her sex, especially through drugs or surgical means. As a Christian, I also believe that God has ordained the sexual function for procreation, that children are a gift from God, and that, absent a compelling reason, one should not sterilize oneself. Although these are my religious beliefs, I never mentioned them in class. I did not preach any of my beliefs in class. Thus, the allegation that I conducted "religious preaching" is unsubstantiated. Ex. D.

Separately, my faith—as well as my integrity as an academic—forbids me from teaching or affirming statements that I believe are false. I believe that I am obligated as a Christian and as a professor to teach accurate, true concepts that comport with my many years of research and study in the field of human biology.

My Former Employer's Discrimination Against My Religious Beliefs and Exercise

St. Philip's College engaged in disparate treatment that violated Title VII of the Civil Rights Act when it terminated me because of my sincerely held religious beliefs and protected speech. The only reason the College gave for firing me was the student complaint(s) of "religious preaching, discriminatory comments about homosexuals and transgender individuals, anti-abortion rhetoric, and misogynistic banter." Ex D. While I never preached or proselytized in class, the accusation of religious preaching was clearly in connection with the fact that I serve as an associate pastor. I would mention this by way of introduction at the beginning of each semester, so my students were aware. The College assumed I was preaching rather than teaching due to

negative, discriminatory stereotypes about Christians. This perception was inaccurate and discriminatory.

If not for my beliefs about gender, sexuality, and human life, I would not have been fired. Thus, religion was clearly a but-for cause—and a motivating factor—of my termination.

The actions of St. Philip’s College also have a disparate impact on religious employees. The pattern and practice of terminating professors because of in-class statements that reflect their beliefs has a discriminatory effect on religious professors like myself.

St. Philip’s College also violated the TCHRA when it terminated me because of my religious beliefs and protected speech. When the College discharged me based on my protected speech and religious identity, it violated Section 21.051 of the TCHRA. Section 21.108 protects “any aspect of religious observance, practice, or belief,” and thus the College violated this statute when it terminated me because of my religious beliefs and identity.

Conclusion

St. Philip’s College violated Title VII and the TCHRA when it:

- accused me of violating “the highest standards of academic honesty and integrity” based on unsubstantiated student complaints;
- assumed I was preaching rather than teaching due to negative, discriminatory stereotypes about and inaccurate perceptions of Christians;
- investigated me for a potential ethics violation based on unsubstantiated student complaints;
- refused to show me the student complaints or give me an opportunity to meet with the students;
- accused me of “religious preaching” because of my Christian beliefs and identity as a volunteer associate pastor;
- disparaged my religious beliefs by calling my “classroom behavior” “unacceptable,” and “offensive”;
- terminated me because of my Christian religious beliefs;
- terminated me because of my statements in class that reflect my study of biology and my religious beliefs; and
- terminated me because of my protected classroom speech, based on a college-approved textbook.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION INTAKE QUESTIONNAIRE

Please immediately complete this entire form and return it to the U.S. Equal Employment Opportunity Commission ("EEOC"). **REMEMBER**, a charge of employment discrimination must be filed within the time limits imposed by law, within 180 days or in some places within 300 days of the alleged discrimination. When we receive this form, we will review it to determine EEOC coverage. **Answer all questions completely, and attach additional pages if needed to complete your responses. If you do not know the answer to a question, answer by stating "not known." If a question is not applicable, write "N/A." (PLEASE PRINT)**

1. Personal Information

Last Name: Varkey First Name: Johnson MI: _____

Street or Mailing Address: _____ Apt or Unit #: _____

City: San Antonio County: Bexar State: TX Zip: _____

Phone Numbers: Home: (____) _____ Work: (____) _____

Cell: _____ Email Address: _____ Date of Birth: _____

Sex: Male Female Do You Have a Disability? Yes No

Please answer each of the next three questions. i. Are you Hispanic or Latino? Yes No

ii. What is your Race? Please choose all that apply. American Indian or Alaskan Native Asian White

Black or African American Native Hawaiian or Other Pacific Islander

iii. What is your National Origin (country of origin or ancestry)? India

Please Provide The Name Of A Person We Can Contact If We Are Unable To Reach You:

Name: Kayla Toney Relationship: Attorney

Address: 1331 Pennsylvania Ave NW, Suite 1410 City: Washington State: DC Zip Code: 20004

Home Phone: (____) _____ Other Phone: (____) _____

2. I believe that I was discriminated against by the following organization(s): (Check those that apply)

Employer Union Employment Agency Other (Please Specify) _____

Organization Contact Information (If the organization is an employer, provide the address where you actually worked. If you work from home, check here and provide the address of the office to which you reported.) **If more than one employer is involved, attach additional sheets.** St. Philip's College

Organization Name: _____

Address: 1801 Martin Luther King Drive County: Bexar

City: San Antonio State: TX Zip: 78203 Phone: _____

Type of Business: College Job Location if different from Org. Address: _____

Human Resources Director or Owner Name: Randall Dawson Phone: (____) _____

Number of Employees in the Organization at All Locations: Please Check (✓) One

Fewer Than 15 15 - 100 101 - 200 201 - 500 More than 500

3. Your Employment Data (Complete as many items as you are able.) Are you a federal employee? Yes No

Date Hired: 9-21-04 Job Title At Hire: Adjunct Professor

Pay Rate When Hired: _____ per 3 credit hours Last or Current Pay Rate: _____ per 8 credit hours

Job Title at Time of Alleged Discrimination: Adjunct Professor Date Quit/Discharged: Discharged 1-27-23

Name and Title of Immediate Supervisor: Shane Kendell, Head of Department

If Job Applicant, Date You Applied for Job _____ Job Title Applied For _____

4. What is the reason (basis) for your claim of employment discrimination?

FOR EXAMPLE, if you feel that you were treated worse than someone else because of race, you should check the box next to Race. If you feel you were treated worse for several reasons, such as your sex, religion and national origin, you should check all that apply. If you complained about discrimination, participated in someone else's complaint, or filed a charge of discrimination, and a negative action was threatened or taken, you should check the box next to Retaliation.

Race Sex Age Disability National Origin Religion Retaliation Pregnancy Color (typically a difference in skin shade within the same race) Genetic Information; circle which type(s) of genetic information is involved:
i. genetic testing ii. family medical history iii. genetic services (genetic services means counseling, education or testing)

If you checked color, religion or national origin, please specify: Christian

If you checked genetic information, how did the employer obtain the genetic information? _____

Other reason (basis) for discrimination (Explain): _____

5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name(s) and title(s) of the person(s) who you believe discriminated against you. Please attach additional pages if needed.

(Example: 10/02/06 – Discharged by Mr. John Soto, Production Supervisor)

Date: 1-12-23 **Action:** I received an email from Randall Dawson, informing me I was being investigated for an "ethics violation complaint" and that my access to campus was revoked.

Name and Title of Person(s) Responsible: _____ Randall Dawson, Vice President for Academic Success

B. Date: 1-27-23 **Action:** I was terminated because of my religious beliefs and protected classroom speech.

Name and Title of Person(s) Responsible _____ Randall Dawson, Vice President for Academic Success; Nina Sosa, Director of Employee Relations

6. Why do you believe these actions were discriminatory? Please attach additional pages if needed. Without any opportunity to respond, I was fired because of my statements during my college-approved lecture on human reproduction, which is consistent with my religious beliefs. Please see my attached statement for more details.

7. What reason(s) were given to you for the acts you consider discriminatory? By whom? His or Her Job Title?
_____ Randall Dawson, VP for Academic Success, cited unsubstantiated student complaints accusing me of "religious preaching" in class, even though I was teaching basic biology from the college-approved textbook.

8. Describe who was in the same or similar situation as you and how they were treated. For example, who else applied for the same job you did, who else had the same attendance record, or who else had the same performance? Provide the race, sex, age, national origin, religion, or disability of these individuals, if known, and if it relates to your claim of discrimination. For example, if your complaint alleges race discrimination, provide the race of each person; if it alleges sex discrimination, provide the sex of each person; and so on. Use additional sheets if needed.

Of the persons in the same or similar situation as you, who was treated better than you?

Full Name Race, Sex, Age, National Origin, Religion or Disability Job Title Description of Treatment

A. _____

B. _____

Of the persons in the same or similar situation as you, who was treated *worse* than you?

Full Name Race, Sex, Age, National Origin, Religion or Disability Job Title Description of Treatment

A. _____

B. _____

Of the persons in the same or similar situation as you, who was treated the *same* as you?

Full Name Race, Sex, Age, National Origin, Religion or Disability Job Title Description of Treatment

A. _____

B. _____

Answer questions 9-12 only if you are claiming discrimination based on disability. If not, skip to question 13. Please tell us if you have more than one disability. Please add additional pages if needed.

- 9. Please check all that apply:**
- Yes, I have a disability
 - I do not have a disability now but I did have one
 - No disability but the organization treats me as if I am disabled

10. What is the disability that you believe is the reason for the adverse action taken against you? Does this disability prevent or limit you from doing anything? (e.g., lifting, sleeping, breathing, walking, caring for yourself, working, etc.).

11. Do you use medications, medical equipment or anything else to lessen or eliminate the symptoms of your disability?

- Yes No

If "Yes," what medication, medical equipment or other assistance do you use?

12. Did you ask your employer for any changes or assistance to do your job because of your disability?

- Yes No

If "Yes," when did you ask? _____ How did you ask (verbally or in writing)? _____

Who did you ask? (Provide full name and job title of person)

Describe the changes or assistance that you asked for: _____

How did your employer respond to your request? _____

13. Are there any witnesses to the alleged discriminatory incidents? If yes, please identify them below and tell us what they will say. (Please attach additional pages if needed to complete your response)

Full Name Job Title Address & Phone Number What do you believe this person will tell us?

A. _____

B. _____

14. Have you filed a charge previously on this matter with the EEOC or another agency? Yes No

15. If you filed a complaint with another agency, provide the name of agency and the date of filing: _____

16. Have you sought help about this situation from a union, an attorney, or any other source? Yes No

Provide name of organization, name of person you spoke with and date of contact. Results, if any?

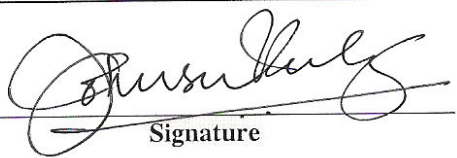
I am represented by attorneys David Hacker, Kayla Toney, and Keisha Russell from First Liberty Institute. _____

We respectfully request a Notice of Right to Sue letter as soon as possible. _____

Please check one of the boxes below to tell us what you would like us to do with the information you are providing on this questionnaire. If you would like to file a charge of job discrimination, you must do so either within 180 days from the day you knew about the discrimination, or within 300 days from the day you knew about the discrimination if the employer is located in a place where a state or local government agency enforces laws similar to the EEOC's laws. If you do not file a charge of discrimination within the time limits, you will lose your rights. If you would like more information before filing a charge or you have concerns about EEOC's notifying the employer, union, or employment agency about your charge, you may wish to check Box 1. If you want to file a charge, you should check Box 2.

BOX 1 I want to talk to an EEOC employee before deciding whether to file a charge. I understand that by checking this box, I have not filed a charge with the EEOC. I also understand that I could lose my rights if I do not file a charge in time.

BOX 2 I want to file a charge of discrimination, and I authorize the EEOC to look into the discrimination I described above. I understand that the EEOC must give the employer, union, or employment agency that I accuse of discrimination information about the charge, including my name. I also understand that the EEOC can only accept charges of job discrimination based on race, color, religion, sex, national origin, disability, age, genetic information, or retaliation for opposing discrimination.


Signature

07-21-23
Today's Date

PRIVACY ACT STATEMENT: This form is covered by the Privacy Act of 1974: Public Law 93-579. Authority for requesting personal data and the uses thereof are:
1) FORM NUMBER/TITLE/DATE. EEOC Intake Questionnaire (9/20/08). 2) AUTHORITY. 42 U.S.C. § 2000e-5(b), 29 U.S.C. § 211, 29 U.S.C. § 626. 42 U.S.C. 12117(a)
3) PRINCIPAL PURPOSE. The purpose of this questionnaire is to solicit information about claims of employment discrimination, determine whether the EEOC has jurisdiction over those claims, and provide charge filing counseling, as appropriate. Consistent with 29 CFR 1601.12(b) and 29 CFR 1626.8(c), this questionnaire may serve as a charge if it meets the elements of a charge. 4) ROUTINE USES. EEOC may disclose information from this form to other state, local and federal agencies as appropriate or necessary to carry out the Commission's functions, or if EEOC becomes aware of a civil or criminal law violation. EEOC may also disclose information to respondents in litigation, to congressional offices in response to inquiries from parties to the charge, to disciplinary committees investigating complaints against attorneys representing the parties to the charge, or to federal agencies inquiring about hiring or security clearance matters.
5) WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL FOR NOT PROVIDING INFORMATION. Providing this information is voluntary but the failure to do so may hamper the Commission's investigation of a charge. It is not mandatory that this form be used to provide the requested information.

EXHIBIT A

D.7.1.2.Ex Exhibit A

**ALAMO COLLEGES
CLASSROOM OBSERVATION**

Name: Dr. Johnson Varkey	Evaluation Period: Fall 2021 to Fall 2022
Banner ID: _____	Department: <u>Natural Sciences</u>
Rank: Instructor Assistant Professor Associate Professor Professor Full-time Temporary Non-Tenure Track (Adjunct)	Date of Employment: __
Tenure: Yes No	Dept Chair/Supervisor: <u>Dr. Shane Kendell</u>
College: SAC <input checked="" type="checkbox"/> SPC PAC NVC NLC	Date/Time: <u>11/16/2021 6.30PM-8.30PM</u>
Course-Section: BIOL 2401-106	

PERFORMANCE CHARACTERISTICS

- E** = **Exceeds Expectations:** Faculty Member's performance is clearly above average. Accomplishments are significant and above the standard of the job responsibilities.
- M** = **Meets Expectations:** Faculty Member's performance meets all essential job requirements. Accomplishments are in accordance with the standards of the position.
- D** = **Does Not Meet Expectations:** Faculty Member's performance is well below the expectation of the job and requires a specific plan of action to improve noted deficiencies.

RESPOND IN EACH CATEGORY

1. Organization of subject matter	<u>E</u>	M	D	
Comments: Dr. Varkey used the lecture slides. Logical flow of information.				
2. Mastery of subject matter	<u>E</u>	M	D	
Comments: Dr. Varkey has excellence in the mastery of subject. Gave clear explanations.				
3. Presentation of Ideas, Concepts, and Assignments	<u>E</u>	M	D	
Comments: Dr. Varkey related concepts to common examples. Dr. Varkey used examples to help students with understanding and explanations.				
4. Encouragement of Student Participation	<u>E</u>	M	D	
Comments: Dr. Varkey frequently asked questions. Encouraged questions from students and answered them.				
5. Interaction with Students	<u>E</u>	M	D	
Comments: Dr. Varkey is very respectful to everyone. Comfortable rapport with students.				
OVERALL APPRAISAL:	<u>E</u>	M	D	
Comments/Examples: Dr. Varkey is an asset to the department. He works well with the students and is well liked by them.				

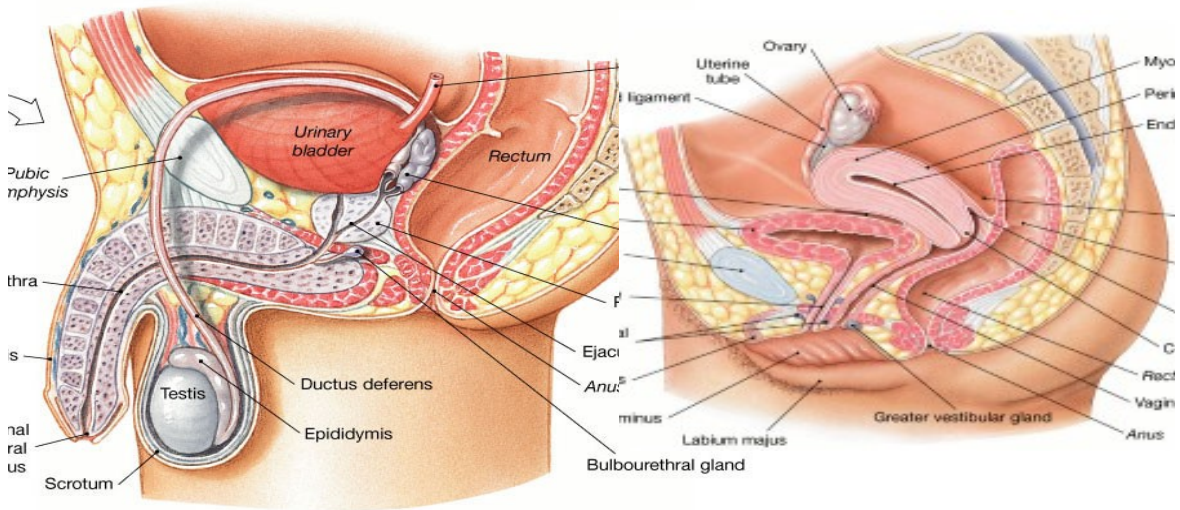
RECOMMENDATIONS/SUGGESTIONS FOR IMPROVEMENT: N/A

SIGNATURES

FACULTY MEMBER	DATE: 11/18/2021
EVALUATOR	DATE:

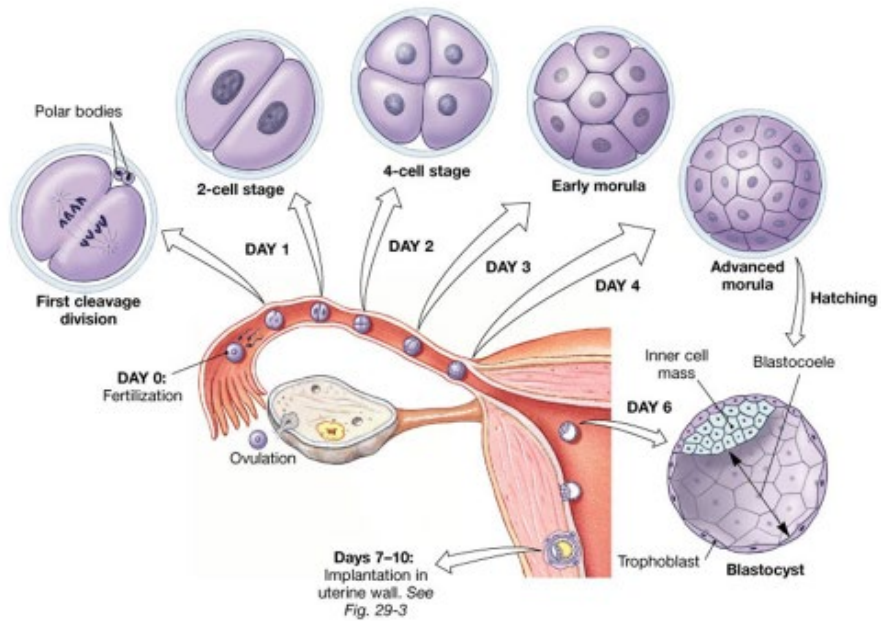
EXHIBIT B

Perpetuation of Human species



19

Prenatal Development



27

EXHIBIT C

From: Dawson, Randall N
Sent: Thursday, January 12, 2023 6:44 PM
To: Varkey, Johnson
Subject: RE: Alamo Colleges District Human Resources Ethics Violation Investigation

Dr. Johnson Varkey,
Any further communication regarding this matter will be addressed through our
Human Resources department.

Respectfully,

Randall Dawson

Randall Dawson, M.S.
Vice President for Academic Success
St. Philip's College

1801 Martin Luther King Dr., San Antonio TX, 78203

Direct: [REDACTED] | **Email:** [REDACTED]

St. Philip's College---Founded 1898
A Point of Pride in the Community

Connect with SPC: #goSPC, @goSPC



From: Varkey, Johnson <[REDACTED]>
Sent: Thursday, January 12, 2023 1:18 PM

To: Dawson, Randall N <[REDACTED]>
Subject: Re: Alamo Colleges District Human Resources Ethics Violation Investigation

Dear Dr. Dawson,
What was the complaint? I am not aware of any violations that I committed.
Please clarify
Thank you

Johnson Varkey Ph.D.
Biology Instructor
St. Philip's College,
San Antonio, TX

From: Dawson, Randall N
Sent: Thursday, January 12, 2023 9:34:42 AM
To: Varkey, Johnson
Subject: Alamo Colleges District Human Resources Ethics Violation Investigation

Dr. Johnson Varkey,
I am sending you notification that Alamo Colleges District Human Resources department is in receipt of an ethics violation complaint from JBSA-Lackland, related to your facilitation of the BIOL 2402 class, during the Flex II Fall 2022 term. On January 10, 2023, JBSA-Lackland's Chief, Education & Training and the Installation Commander Delegate for Education Oversight revoked your access to all JBSA installations, pending the outcome of the investigation.

Any further communication regarding this matter will be addressed through our Human Resources department.

Respectfully,

Randall Dawson

Randall Dawson, M.S.
Vice President for Academic Success
St. Philip's College

1801 Martin Luther King Dr., San Antonio TX, 78203

Direct: [REDACTED] | **Email:** [REDACTED]

St. Philip's College---Founded 1898
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Connect with SPC: #goSPC, @goSPC



EXHIBIT D



ALAMO COLLEGES

ST. PHILIP'S COLLEGE

Office of the Vice President of Academic Success

CONFIDENTIAL MEMORANDUM

To: Dr. Johnson Varkey, Adjunct Instructor, Biology

From: Randall Dawson, Vice President for Academic Success *Randall Dawson*

CC: Nina Sosa, Director of Employee Relations, Advocacy and Civil Rights on behalf of

Date: January 27, 2023

Re: Notice of Discipline – Termination of Employment and Contract

St. Philip's College has received numerous complaints that were submitted to Joint Base San Antonio Training and Education regarding your classroom behavior while facilitating in an official teaching capacity on JBSA-Lackland last semester, which is found to be unacceptable. The complaint contained several reports of "religious preaching, discriminatory comments about homosexuals and transgender individuals, anti-abortion rhetoric, and misogynistic banter." While some of the subject matter may be connected to class content, it was very clear, from the complaints, that you pushed beyond the bounds of academic freedom with your personal opinions that were offensive to many individuals in the classroom.

Your conduct and behavior stated above violate the following procedures:

➤ **D.4.10.1 (Procedure) Faculty Code of Professional Ethics**

1. The Professional Educator shall treat all persons with respect, dignity, and justice, discriminating against no one on any arbitrary basis such as ethnicity, creed, gender, disability, or age.
2. The Professional Educator shall strive to help each student realize his or her full potential as a learner and as a human being.
3. The Professional Educator shall by example and action encourage and defend the unfettered pursuit of truth by both colleagues* and students supporting the free exchange of ideas, observing the highest standards of **academic honesty and integrity**, and seeking always an attitude of scholarly objectivity and tolerance of other viewpoints.

You are already not scheduled for Spring 2023 classes, but the seriousness of your behavior warrants the prohibition of any further employment with the College District. In addition, your access to all Joint Base San Antonio (JBSA) installations has been

revoked, until further notice.

Please sign below to acknowledge your receipt of this memorandum. Please **return the signed copy to Randall Dawson, Vice President for Academic Success, St. Philip's College.**

Johnson Varkey

Date