

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

5:25-CV-244

KEVIN N. BASS, Ph.D., §
§
Plaintiff, §
§
v. § Civil Action No. 5:25-cv-00270-H
§
TEXAS TECH UNIVERSITY HEALTH §
SCIENCES CENTER, et al., §
§
Defendants. §

PLAINTIFF'S OBJECTIONS TO THE MAGISTRATE JUDGE'S
FINDINGS, CONCLUSIONS, AND RECOMMENDATION REGARDING
PRELIMINARY INJUNCTIVE RELIEF, AND BRIEF IN SUPPORT
(FED. R. CIV. P. 72 & 28 U.S.C. § 636(b)(1))

TO THE HONORABLE DISTRICT JUDGE HENDRIX:

Plaintiff Kevin N. Bass, Ph.D. ("Plaintiff"), proceeding pro se, respectfully submits these objections to the Magistrate Judge's Findings, Conclusions, and Recommendation ("FCR") recommending denial of preliminary injunctive relief. These objections are filed under Federal Rule of Civil Procedure 72(b), 28 U.S.C. § 636(b)(1), and Local Civil Rule 72.2, and are supported by the Verified Complaint, Plaintiff's unsworn declaration under 28 U.S.C. § 1746 ("Bass Decl."), and Exhibits 1–7 and W.

I. INTRODUCTION AND OVERVIEW OF CLAIMS

1.

This case challenges an ongoing combination of state-created stigma and status change that functions as a quasi-official declaration that Plaintiff is unsafe and unfit to participate in medicine. TTUHSC has (a) dismissed Plaintiff from its M.D./Ph.D. program on alleged "non-academic" grounds; (b) placed an "Administrative Dismissal Effective 01-11-2024" notation on his official School of Medicine and Graduate School transcripts; and (c) used emergency-removal, campus-ban, and threat-assessment paperwork—plus internal broadcasts telling students they were "one student lighter" and to "check his Twitter"—to frame him as a dangerous, sexually inappropriate student whose dismissal was justified by safety concerns.

2.

The Verified Complaint asserts six counts, all aimed at forward-looking relief:

* **Counts 1–2 (ADA / § 504).** TTUHSC allegedly misused “direct threat” rhetoric while denying effective-communication and process accommodations documented by Plaintiff’s neuropsychological evaluation and by TTUHSC’s own disability-services policy.

* **Count 3 (procedural due process).** TTUHSC allegedly imposed an extreme status change (emergency suspension, campus ban, and eventual dismissal) without meaningful pre-deprivation conversation or transparent procedures.

* **Count 4 (stigma-plus / name-clearing).** TTUHSC’s transcript notation, CTW/threat paperwork, and related publications are alleged to satisfy the Fifth Circuit’s seven-factor “stigma-plus-infringement” test and to require a name-clearing hearing.

* **Counts 5–6 (First Amendment and ADA/§ 504 retaliation).** Plaintiff alleges that controversial but protected Twitter commentary and internal grievances about discrimination were used as a trigger for the “threat” narrative, suspension, and dismissal.

3.

The FCR recommends denying preliminary injunctive relief primarily because (a) the Magistrate Judge did not see proof of Rule 65(a)(1) notice, and (b) on the complaint-only record, the harms were characterized as “past” or purely reputational and therefore compensable by damages. Plaintiff now offers a sworn declaration and targeted exhibits that substantially change the record on irreparable harm and clarify how each count supports narrow, forward-looking relief.

4.

Plaintiff is **not** presently asking the Court to order full reinstatement. The immediate request is narrower: (1) interim relief to stop TTUHSC from further non-required dissemination of the stigmatizing transcript notation and “threat” narrative; and (2) an ADA-compliant, neutral name-clearing hearing (and related transcript annotation) that addresses the continuing stigma-plus injury at the heart of Counts 3–4, with accommodations necessary to vindicate Counts 1–2 and guard against further retaliation under Counts 5–6.

5.

At a minimum, Plaintiff asks that the Court **not** adopt the FCR’s irreparable-harm analysis as law of the case. Instead, the Court should (a) recognize that service and notice defects are now being cured; (b) hold that Plaintiff has plausibly alleged, and now evidences, ongoing, non-compensable injuries tied to each count; and (c) preserve Plaintiff’s ability to obtain preliminary relief on a fuller, adversarial record after Defendants appear.

II. PROCEDURAL POSTURE AND SERVICE / NOTICE

6.

Plaintiff filed his Verified Complaint and embedded Rule 65 section on November 6–7, 2025, before Defendants had been served or appeared. The Magistrate Judge treated that embedded section as an operative preliminary-injunction motion and ruled on the complaint-only record.:contentReference[oaicite:9]{index=9}

7.

On the same day these Objections are filed, Plaintiff is ****serving the summons, Verified Complaint, and this Rule 65 briefing (including Exhibits 1–7 and W) on all named Defendants**** by methods permitted under Rule 4. Plaintiff will file proofs of service as soon as they are available. He does ****not**** seek ex parte injunctive relief, and any temporary relief he ultimately obtains would follow notice and an opportunity for Defendants to respond.

8.

This approach satisfies Rule 65(a)(1)'s notice requirement and cures the procedural concern identified in cases where courts deny preliminary relief solely because the movant had not yet provided notice or a certificate of service. Plaintiff respectfully requests that, to the extent the Court denies interim relief at this stage, such denial be expressly ****without prejudice**** to a renewed motion after service and a short adversarial schedule.

III. PRELIMINARY-INJUNCTION STANDARD (SHORT STATEMENT)

9.

The familiar four-factor test applies: Plaintiff must show (1) a substantial likelihood of success on at least one claim; (2) a substantial threat of irreparable injury if preliminary relief is denied; (3) that the threatened injury outweighs any harm to Defendants; and (4) that an injunction will not disserve the public interest. An injury is irreparable if it “cannot be undone through monetary remedies.”

10.

Courts in this Circuit have repeatedly held that ongoing constitutional violations, loss of unique educational or professional opportunities, and structural barriers to pursuing one's chosen profession can constitute irreparable harm—particularly where the defendant is a sovereign immune from damages. That principle is especially salient where, as here, a medical student alleges a state-created stigma-plus condition that blocks access to the only pipeline into his chosen profession.

IV. OBJECTION NO. 1 – RULE 65 NOTICE IS NOW BEING SATISFIED

11.

The FCR correctly noted that Plaintiff had not yet proved notice to Defendants when the Magistrate Judge ruled on the embedded Rule 65 request. But that defect is now being cured: Plaintiff is contemporaneously serving the summons, Verified Complaint, this brief, and all supporting exhibits via Rule 4. See *supra* ¶ 7.

12.

Because the purpose of Rule 65(a)(1) is to ensure that preliminary injunctions are not issued without notice and an opportunity to be heard, not to bar relief forever based on a curable timing issue, Plaintiff respectfully objects to any reading of the FCR that would preclude renewed preliminary-injunction practice after service.

13.

Plaintiff therefore asks the Court to (a) treat the FCR's Rule 65 notice discussion as limited to the pre-service record, and (b) expressly state that Plaintiff may seek preliminary relief again—on proper notice and with full adversarial briefing—if the Court concludes that immediate relief is not appropriate at this juncture.:contentReference[oaicite:16]{index=16}

V. OBJECTION NO. 2 – THE FCR MISAPPREHENDS IRREPARABLE HARM AND THE SIX COUNTS

A. Counts 3–4: Ongoing stigma-plus and denial of a name-clearing hearing

14.

Plaintiff's declaration and exhibits now show a ****continuing**** stigma-plus condition:

a. ****Transcript notation and republication.**** TTUHSC's official SOM transcript—most recently issued on October 16, 2025—contains the notation "Administrative Dismissal Effective 01-11-2024." Every time TTUHSC, through Parchment, issues that transcript to a medical school, residency, or fellowship program, it republishes a disciplinary dismissal label that *medical-education gatekeepers understand as a serious, non-academic infraction.*

b. ****Threat narrative, CTW, and broadcast emails.**** TTUHSC's emergency-removal and CTW paperwork, plus internal broadcasts and residency/GME messaging, describe Plaintiff to campus and hospital gatekeepers as someone who cannot be allowed on campus or in clinical facilities because of "threat" concerns and "harassing" behavior.

c. ****Public echo in the medical community.**** Third-party physicians, residents, and students now tell national audiences that Plaintiff was "kicked out of medical school for sexual harassment and threats of physical violence," is "only allowed on campus with a police escort," and was expelled after TTUHSC "made flyers." These posts explicitly tie their claims to

TTUHSC's dismissal and threat-assessment actions, and some even boast "we are the reason he was expelled."

15.

Plaintiff's October 19, 2025 email to TTUHSC (Exhibit 6) formally ****invokes his liberty interest and requests a name-clearing hearing and interim transcript relief****—including a neutral transcript annotation, identification of prior transcript recipients, and a pause on non-required dissemination of the stigmatizing narrative. He also requests ADA/§ 504 accommodations for that hearing and an ongoing interactive process with Student Disability Services.

16.

TTUHSC has ****not**** scheduled such a hearing, has not identified a neutral presider, and has not provided interim transcript relief despite follow-up emails asking for confirmation and a schedule. Plaintiff remains ready and willing to participate in an ADA-compliant name-clearing process.
process.:contentReference[oaicite:25]{index=25}

17.

Under Fifth Circuit law, a stigma-plus claim arises where the government (1) makes stigmatizing charges, (2) in connection with an altered legal status, (3) disseminates them to third parties, and (4) refuses a requested name-clearing hearing. Texas courts applying similar principles in the medical-education context have recognized that a disciplinary dismissal record may render it "virtually impossible" for a student to gain admission elsewhere or enter the profession, and have ordered new hearings as the appropriate remedy.

18.

Plaintiff's evidence fits that paradigm: the *****plus***** is not just loss of a single position; it is a formal label on state-controlled transcripts and threat-assessment paperwork that state actors continue to issue and rely on, combined with TTUHSC's refusal to provide the requested, ADA-compliant name-clearing hearing. The injury is therefore ****ongoing and constitutional****, not a one-time reputational bruise.

19.

Because money damages years from now cannot erase the trail of official transcripts, CTW/threat directives, and derivative online posts that will have already circulated through residency programs, employers, and background checks, this stigma-plus injury is irreparable absent forward-looking relief under Counts 3–4.

B. Counts 1–2: ADA / § 504 "direct threat" and effective-communication failures

20.

Plaintiff's neuropsychological evaluation documents a combination of [REDACTED] and [REDACTED] conditions that substantially limit his ability to concentrate, think, and communicate efficiently in time-pressured, adversarial settings. The evaluator recommended standard accommodations such as extended or flexible time for complex questioning, scheduled breaks, and options for written questions.

21.

TTUHSC received timely ADA notice. A December 8, 2023 email from Plaintiff's counsel informed TTUHSC that a formal evaluation had been completed, that it identified significant [REDACTED] conditions, and that the report would be provided so decision-makers could consider diagnosis and accommodations at the December 11, 2023 hearing.

22.

Yet the hearing officer: (a) treated ADA compliance as someone else's responsibility ("normally we go through Student Disability Services"); (b) limited "accommodations" to water, snacks, and unscheduled breaks; (c) barred Plaintiff's counsel from directly questioning witnesses, allowing only written questions through the presider; (d) withheld the accommodations section of the evaluation from the Board; and (e) excluded the neuropsychologist's testimony.

23.

These choices violated TTUHSC's own ADA policy, which describes the ADA and § 504 as civil-rights statutes that obligate TTUHSC to make "adjustments and accommodations" and "offer to persons with disabilities the opportunity to participate fully in all institutional programs and activities," including high-stakes disciplinary processes.

24.

Plaintiff's October 19, 2025 name-clearing request explicitly asks TTUHSC to treat a future hearing as part of an **ongoing ADA/§ 504 interactive process**, identifies specific communication-related accommodations (equal time; scheduled breaks; neutral presider managing turn-taking; option for written questions; real-time captioning if needed; and the ability to consult notes), and states that SDS intake can proceed in parallel without delaying the hearing.

25.

TTUHSC's refusal to provide *any* process that integrates those accommodations—while continuing to operate its professionalism and threat-assessment systems in the same way—creates an ongoing Title II / § 504 violation. Courts recognize that where a public entity's

policies and practices deny disabled individuals meaningful access to official proceedings, injunctive relief is an appropriate and often necessary remedy. The FCR's suggestion that Plaintiff's injuries are purely retrospective does not account for the prospective, process-oriented nature of Counts 1–2.

C. Counts 5–6: Retaliation and continuing chill of protected speech

26.

Exhibit W (meeting with Senior Associate Dean Simon Williams) shows that a key decision-maker has “never sensed threat or danger” from Plaintiff, characterizes the tweet at issue as “free speech,” and describes TTUHSC's response (suspension and campus ban) as “pretty extreme” and something he has seen only once before.

27.

Williams repeatedly tells Plaintiff that “people shouldn't overreact to your tweets,” acknowledges that the tweet was “misinterpreted,” and agrees that the institution's response links the tweet to generalized concerns rather than any concrete threat. Plaintiff, for his part, explicitly disavows violence and anchors his conduct in “big dreams” and long-term goals.^{contentReference[oaicite:38]{index=38}}

28.

The same internal communications that fuel Count 4's stigma-plus theory also support Counts 5–6: the “we are one student lighter... check his Twitter” class email and related broadcasts explicitly invite students and residents to view Plaintiff's controversial speech as the cause of his removal. Online posts catalogued in Exhibit 4 reiterate that narrative to thousands of viewers, often in direct response to Plaintiff's ongoing public commentary.

29.

In the First Amendment context, the Supreme Court has made clear that even short-lived loss or chilling of protected speech can constitute irreparable injury. Here, Plaintiff alleges that TTUHSC's actions have already chilled his willingness to speak about public-health and institutional issues, and that continued dissemination of the “dangerous, sexually-misconducting student” label will deter him from exercising his rights going forward.

30.

The FCR's irreparable-harm analysis did not have the benefit of Exhibit W, the ADA documentation, or the name-clearing correspondence. Those materials now show that the “threat” narrative was internally recognized as an overreaction to speech, that TTUHSC nonetheless imposed an exceptional sanction, and that it continues to leave the speech-linked

stigma in place while denying Plaintiff any effective forum to contest it. That combination of retaliation and ongoing chill is classically irreparable.

D. Aggregated, ongoing harm across all six counts

31.

Plaintiff's declaration explains how these strands combine: state-controlled transcripts with a disciplinary dismissal notation; CTW and threat-assessment paperwork; a medical-community rumor mill that repeatedly attributes "sexual misconduct" and "threats of violence" to Plaintiff; and the loss of time-sensitive opportunities to transfer, obtain clinical experience, or secure fellowships.

32.

For example, Plaintiff's correspondence with St. Matthew's University School of Medicine (Exhibit 3) shows that as early as February 2024 he was trying to transfer, that SMUSOM required an official TTUHSC transcript and Dean's letter, and that his dismissal notation had to be provided as part of that process. Plaintiff attests that each new transcript order and each new application cycle "renews the damage" and further constricts his career path.

33.

These injuries cannot be fully "unwound" at the end of the case with money. A delayed damages remedy cannot reconstruct a lost medical-school transfer cycle, restore a missed match season, or erase the accumulated effect of official transcripts and threat narratives that have already been transmitted to programs and employers. The FCR's conclusion that Plaintiff's harms are purely past and compensable underestimates both the structure of medical training and the ongoing nature of the alleged violations.

VI. OBJECTION NO. 3 – THE FCR SHOULD NOT BE TREATED AS LAW OF THE CASE

34.

Given the limited record before the Magistrate Judge and the new evidence now presented (Exhibits 1–7 and W), Plaintiff respectfully asks that the Court not adopt the FCR's irreparable-harm reasoning as binding law of the case. Instead, the Court should clarify that:

a. the FCR's notice discussion addressed only the pre-service posture and does not bar renewed preliminary-injunction practice after service;

b. Plaintiff has plausibly alleged, and now substantiated, ongoing, non-compensable harms tied to each of the six counts; and

c. any denial of interim relief at this time is ****without prejudice**** to a future, fully briefed motion supported by live testimony or additional evidence as appropriate.

VII. REQUESTED RELIEF

35.

For these reasons, Plaintiff respectfully requests that the Court:

(a) ****Sustain**** these objections in part by declining to adopt the FCR's irreparable-harm analysis as law of the case;

(b) Clarify that Plaintiff may pursue preliminary injunctive relief again after service and adversarial briefing, and, if the Court finds it useful, treat these Objections (together with Exhibits 1–7 and W) as a renewed motion for preliminary injunction on a more complete record;

(c) In connection with any renewed motion, consider granting ****narrow, restorative relief**** tailored to the six counts, including:

- Interim transcript relief (a neutral notation in place of “Administrative Dismissal Effective 01-11-2024,” no re-imposition without lawful process, and identification of prior transcript recipients so that corrective notices can be issued if appropriate);
- A pause on non-required dissemination of stigmatizing statements to external third parties (students, donors, media, clinical affiliates) pending a name-clearing hearing;
- An ADA/§ 504-compliant name-clearing hearing before a neutral presider, with the accommodations and procedural safeguards outlined in Exhibit 6, and written findings suitable for public release;
- Prospective relief to ensure that any future professionalism, threat-assessment, or disciplinary processes involving Plaintiff are conducted in compliance with the ADA/§ 504 and the Constitution, and that Plaintiff is not retaliated against for requesting accommodations or seeking to clear his name.

36.

Plaintiff further requests all other relief to which he may be justly entitled, at law or in equity.

Respectfully submitted,

—

Kevin Norris Bass, Ph.D.
Plaintiff, pro se

[REDACTED]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

KEVIN N. BASS,
Plaintiff,

v.

TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER, et al.,
Defendants.

Civil Action No. 5:25-cv-00270-H

DECLARATION OF KEVIN NORRIS BASS

(28 U.S.C. § 1746 - Unsworn Declaration)

I, Kevin Norris Bass, declare under penalty of perjury that the following is true and correct:

1. My name is Kevin Norris Bass. I am over 18 years of age, of sound mind, and competent to make this declaration. I am the plaintiff in this action, and I have personal knowledge of the facts stated here unless otherwise indicated.

2. I was enrolled in the M.D./Ph.D. program at Texas Tech University Health Sciences Center ("TTUHSC"). I completed my Ph.D. in March 2023 and resumed clinical clerkships in May 2023. In late 2023, TTUHSC imposed an emergency removal and campus ban and later dismissed me from the School of Medicine.

3. This declaration describes the ongoing harms I continue to suffer from TTUHSC's actions, including (a) the "Administrative Dismissal" notation on my official transcripts, (b) the continuing effects of TTUHSC's "threat" and Criminal Trespass Warning paperwork, (c) online stigma tied to TTUHSC's actions, (d) lost transfer and training opportunities, (e) financial pressures, and (f) disability-related issues and future processes.

A. Transcript notation and continuing republication

4. My official TTUHSC School of Medicine and Graduate School of Biomedical Sciences transcripts now carry an "Administrative Dismissal Effective 01-11-2024" notation under Spring 2024.

5. In my experience as a student and academic, that phrasing is understood in the medical-education context to mean a non-academic, disciplinary dismissal--not a neutral academic withdrawal or leave.

6. TTUHSC uses an electronic system (Parchment) to issue official transcripts. I cannot alter the contents of those transcripts. Any medical school or residency program that requires an official transcript receives exactly what TTUHSC provides.

7. On or about October 16, 2025, I requested an official School of Medicine transcript through Parchment. The transcript I received contained the notation "Administrative Dismissal Effective 01-11-2024." I am not aware of any official version of my TTUHSC

transcript that does ****not**** include this dismissal notation.

8. In 2025, I began the process of applying to transfer to St. Matthew's University School of Medicine ("SMUSOM"). SMUSOM required my official TTUHSC transcripts as part of its admissions review. To move my application forward, I had no choice but to provide the TTUHSC transcript bearing the "Administrative Dismissal" notation.

9. Each time TTUHSC, through Parchment, issues an official transcript containing this language, TTUHSC republishes a stigmatizing, non-academic dismissal notation to third parties who control access to my chosen profession.

B. Threat narrative, CTW, and access restrictions

10. On November 4, 2023, TTUHSC imposed an "Emergency Removal/Interim Suspension" based on a social-media post and alleged "threat" concerns. That same morning, TTU campus police issued a Criminal Trespass Warning ("CTW") to me.

11. The CTW barred me from "ALL TEXAS TECH PROPERTY" for a period of one year unless otherwise stated in writing by a Texas Tech Police Department official. While it was in effect, I could not enter TTUHSC buildings or affiliated facilities without risking arrest.

12. As part of the same response, TTUHSC officials circulated communications to multiple recipients--including personnel associated with TTUHSC clinical sites--directing that I not be allowed into certain offices and that I not be badged into hospitals pending further notice.

13. These emergency-removal, campus-ban, and CTW documents describe me as an ongoing safety risk and connect that risk to alleged sexual-misconduct and threat behavior. To my knowledge, TTUHSC has never sent a corrective communication to those same recipients stating that I am not a danger or that the threat assessment was mistaken or overstated.

14. The formal one-year term of the CTW has expired. However, I have never received written confirmation that the underlying "threat" classification, CTW records, or "do not badge" instructions have been removed or corrected in TTUHSC or affiliated-hospital security systems. I remain concerned that these records continue to affect how hospitals and training sites view me.

C. Online stigma and reputational harm

15. I have had a public presence on social media for several years, including Twitter/X, Bluesky, and other platforms, where I discuss medicine, science, and health policy.

16. After TTUHSC's emergency removal and dismissal, I began noticing an increasing number of public posts by physicians, residents, medical students, and others discussing me and my situation.

17. I have personally collected and archived many posts that describe me as, for example, "kicked out of medical school for sexual misconduct," "expelled for sexual harassment complaints and threats of violence," "posting mass-shooter-vibes threats," or "only allowed on campus with a police escort," and that reference TTUHSC "making flyers" or "warning the hospitals."

18. Several of these posts repeat distinctive internal phrases from TTUHSC's own documents and communications--for example, references to a "medical committee vote to expel," an emergency removal based on "threats" and "harassing residents," and email instructions not to allow me onto campus.

19. From my review of engagement statistics on these platforms, many of these posts have tens of thousands of views; collectively, the set of posts I have tracked has been seen hundreds of thousands of times and continues to be recirculated whenever my name appears in public discussions.

20. I have no practical way to force these third parties to retract or delete their posts. As long as TTUHSC maintains its dismissal notation and threat paperwork, those posts are effectively backed by official university records and continue to damage my reputation in the medical and scientific community.

D. Lost transfer opportunities and training cycles

21. My primary professional goal now is to build a public-health technology company that works in partnership with mainstream public-health and medical institutions--health systems, academic medical centers, public-health agencies, and other organizations that serve patients at scale.

22. To enter that space, I will repeatedly have to undergo institutional due-diligence and vetting. Hospitals, universities, and public-health agencies typically require background checks and academic records when they consider someone for a leadership, advisory, or co-founder role, especially if that person will be working with data, patients, or trainees under their brand.

23. In every one of those settings, TTUHSC's records are the first thing evaluators will see: an "Administrative Dismissal Effective 01-11-2024" on my official SOM and GSBS transcripts, coupled with emergency-removal, threat-assessment, and Criminal Trespass Warning paperwork that frames me as a danger to campus and affiliated hospitals. Those documents function as a quasi-official statement that I am unsafe and unfit to be in clinical environments.

24. For a public-health technology startup that depends on trust and collaboration with mainstream institutions, that kind of dismissal and threat narrative is close to disqualifying. It makes it much harder to secure pilot sites, institutional partners, or advisory roles, and it gives risk-averse general counsel and compliance officers a ready reason to say "no" before they ever reach the merits of the product.

25. I also want to preserve the option of returning to medical training in the future if that becomes realistic and compatible with my startup work. Because TTUHSC has dismissed me, my only realistic path to an M.D. would be through transfer or re-entry into another medical program. As my interactions with St. Matthew's University School of Medicine and other institutions already show, the TTUHSC dismissal notation and threat narrative severely undermine that possibility and will continue to do so as long as they remain in place.

26. Even if I ultimately never re-enter formal training, the same record will follow me into non-clinical roles that normally would be open to someone with my education--public-health research positions, faculty and advisory appointments, and leadership roles in collaborations between academia and industry. The combination of TTUHSC's transcript notation and threat paperwork permanently alters how future partners and employers will view me, in ways that cannot be undone simply by awarding money damages la

ter.

27. Based on my own experience in higher education, I believe the TTUHSC "Administrative Dismissal" notation and threat narrative were significant negative factors in SMUSOM's decision. A non-academic dismissal for alleged threats and sexual misconduct is an extreme red flag in medical education. SMUSOM made clear that they considered my application incomplete without the TTUHSC transcripts and only reached a final decision after those transcripts were received.

28. Medical-school and residency admissions work on fixed, annual cycles. Because of the TTUHSC dismissal and its continuing effects on my record, I have already missed at least one full transfer cycle and face the risk of missing others. Each missed cycle is gone forever and becomes another gap in my training history that makes re-entry more difficult.

E. Financial pressures

29. Following my dismissal, TTUHSC reversed financial-aid transactions that had been planned for Spring 2024. On February 12, 2024, TTUHSC notified me that I owed a balance of \$24,316.56 for the Spring 2024 semester, which I did not attend, after the return of \$3,524.00 from a Federal Direct Unsubsidized Loan and the cancellation of a \$20,118.11 scholarship.

30. At present, I owe approximately \$250,000 in student loans from my combined graduate and medical education. While my medical education has been halted, those loans have continued to accrue interest and capitalized charges.

31. Because of TTUHSC's dismissal notation and threat narrative, I have been unable to secure a position in another medical program that would allow me to continue progressing toward a physician's income. Instead, I am attempting to support myself and my family with non-physician work while servicing large debts originally incurred to become a doctor.

32. The longer I remain unable to re-enter medical training, the more the interest, fees, and opportunity cost accumulate. These financial harms are ongoing and are directly tied to the obstacles created by TTUHSC's records and narrative.

F. Disability, ADA/§504, and future processes

[REDACTED]

[REDACTED]

It also recommended specific academic and testing accommodations, such as:

- * testing in a distraction-free environment;
- * extra time (e.g., 1.5x) and additional breaks;
- * permission to record and use visual aids; and
- * clearer, more structured instructions and supports during complex tasks.

35. Through my attorney, I provided TTUHSC with this evaluation shortly before the De

December 11, 2023 Student Conduct Board hearing and requested accommodations for the hearing consistent with the report, including modified questioning format and additional time.

36. TTUHSC produced a heavily redacted version of the evaluation for the hearing, treated parts of the report as "outside the scope," and did not meaningfully engage in an interactive process about the accommodations I needed for that high-stakes proceeding.

37. During the December 11 hearing, I struggled to track rapid questioning and to organize my thoughts under the time limits imposed. The restrictions on my counsel's ability to speak directly also made it harder for me to compensate for my processing and communication limitations. I did my best to explain and respond, but I was often overwhelmed and felt that I could not fully present my side of the story.

38. Because TTUHSC remains my record-holder and continues to publish the dismissal notation and threat narrative, I have sought an opportunity to clear my name in a process that accounts for my disabilities. On October 19, 2025, I sent TTUHSC a written request for a name-clearing hearing and for neutral interim transcript language, copying Student Disability Services and counsel. In that request, I expressly asked for an ADA/§504-compliant process, including appropriate accommodations.

39. As of the date of this declaration, TTUHSC has not scheduled a name-clearing hearing, has not offered any meaningful alternative forum for me to contest the allegations in public, and has not provided any interim changes to my transcripts beyond the existing "Administrative Dismissal" notation. I have not been provided with an identified ADA coordinator or a structured interactive process for discussing the accommodations I would need in future proceedings.

40. I remain willing and ready to participate in a properly structured, ADA-compliant hearing or process that would allow me to contest TTUHSC's accusations, address the threat narrative, and work toward restoring my ability to pursue medical training.

G. Aggregated, ongoing harm

41. TTUHSC's actions have created a continuing combination of stigma and status change for me: (a) a formal, non-academic dismissal notation on my official transcripts; (b) threat-assessment and CTW records disseminated to campus and hospital gatekeepers; and (c) an external narrative, repeated by members of the medical community, that I was expelled and banned from campus for threats and sexual misconduct.

42. These harms are not confined to the past. Each new transcript order, each background check that queries TTUHSC, and each application that forces me to disclose the dismissal and "threat" story renews the damage to my reputation and professional prospects.

43. Because of my age, the amount of training I have already completed, and the structured nature of medical-school and residency cycles, additional delay has outsized consequences. Lost clerkship opportunities, missed transfer cycles, and damaged reputation cannot be fully repaired later, even if I were eventually to receive money damages.

44. For these reasons, I believe that the harms I am suffering from TTUHSC's ongoing publications and refusal to provide a meaningful name-clearing opportunity are concrete, continuing, and irreparable absent injunctive relief.

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

Executed on _____, 2025, at _____, Texas.

Kevin Norris Bass

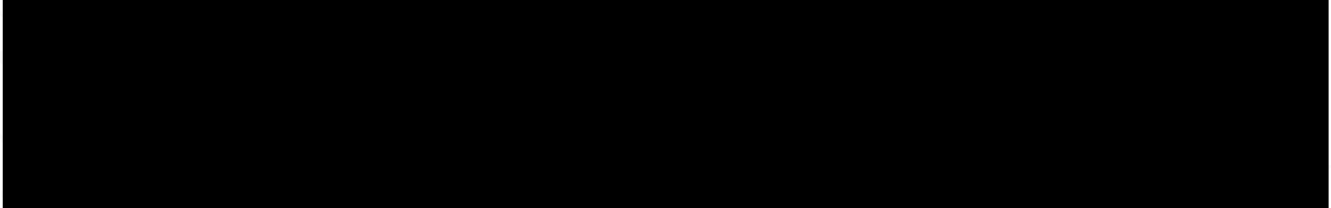


EXHIBIT — OFFICIAL TRANSCRIPT

Texas Tech University Health Sciences Center School of Medicine

Note on Medical School Grading

This transcript is from a pass/fail curriculum. Texas Tech University Health Sciences Center School of Medicine uses the following grade designations rather than traditional letter grades:

- HO — Honors
- HP — High Pass
- PA — Pass

Numeric GPA fields are not used in this grading system and display as 0.000 by default. This does not indicate failing grades or poor academic performance.

Key Information on This Transcript:

- Administrative Status: Administrative Dismissal Effective 01-11-2024
- Total Credit Hours: As shown on transcript

(See following pages for official transcript)

TRANSCRIPTS

Texas Tech University Health Sciences Center

Office of the Registrar, Lubbock, Texas 79430

SSN: [REDACTED]

Date of Birth: [REDACTED]

Date Issued: 16-OCT-2025
HSC Graduate Professional Ofcl

Record of: Kevin Norris Bass
Current Name: Kevin Norris Bass
Issued To: KEVIN BASS

Page: 1

Course Level: Medicine

Current Program
Doctor of Medicine
Program : Medicine
College : School of Medicine
Major : Medicine

SUBJ NO.	COURSE TITLE	CREDGRD	PTS	R	C	SUBJ NO.	COURSE TITLE	CREDGRD	PTS	R	C
INSTITUTION CREDIT:											
Fall 2014	Medicine-Lubbock					Fall 2015	LBK Med and GSBS				
IPMD 5101	Interprof Collab	0.000	PA	.000		MSCI 6106	Basic Medical Spanish	0.000	PA	.000	
MSCI 5101	Clinically Oriented	9.000	PA	.000		MSCI 6107	Gpin Multistays	6.000	HO	.000	
MSCI 5102	Anatomy	6.000	HO	.000		MSCI 6108	Disorders & Can	9.000	HO	.000	
	Biology of Cells and						Integrated				
	Tissues						Neurosciences				
Current	AHRS	15.000				Current	AHRS	15.000			
Cumulative	15.000	15.000				Cumulative	15.000	15.000			
Spring 2015	Medicine-Lubbock					Spring 2016	LBK Med and GSBS				
MSCI 5103	Structure & Funct Maj	6.000	HO	.000		MSCI 6103	System Disorders I	7.000	HO	.000	
MSCI 5104	Host Defense	8.000	HO	.000		MSCI 6104	System Disorders II	5.000	HP	.000	
MSCI 5106	P3/DOCS 1	6.000	PA	.000		MSCI 6109	P3/DOCS 2	5.000	PA	.000	
Current	AHRS	20.000				Current	AHRS	17.000			
Cumulative	35.000	35.000				Cumulative	17.000	17.000			
***** CONTINUED ON NEXT COLUMN *****											
Fall 2016	LBK Med and GSBS					Fall 2016	LBK Med and GSBS				
Leave of Absence Effective 07-01-2016						Leave of Absence Effective 07-01-2016					
Fall 2023	Lubbock Medicine					Fall 2023	Lubbock Medicine				
MOBG 7101	OB/GYN JR Clerkship	8.000	PA	.000		MOBG 7101	OB/GYN JR Clerkship	8.000	PA	.000	
MPED 7101	Pediatric JR Clerkship	8.000	FA	.000		MPED 7101	Pediatric JR Clerkship	8.000	FA	.000	
MPSY 7101	Psychiatry JR Clerkship	8.000	PA	.000		MPSY 7101	Psychiatry JR Clerkship	8.000	PA	.000	
Current	AHRS	24.000				Current	AHRS	16.000			
Cumulative	91.000	83.000				Cumulative	91.000	83.000			
***** CONTINUED ON PAGE 2 *****											


Amanda McSweeney, Registrar

Texas Tech University Health Sciences Center

Office of the Registrar, Lubbock, Texas 79430

SSN: [REDACTED]

Date of Birth: [REDACTED]

Date Issued: 16-OCT-2025
HSC Graduate Professional Ofcl

Record of: Kevin Norris Bass
Level: Medicine

Page: 2

SUBJ NO.	COURSE TITLE	CREDGRD	PTS	R	C
----------	--------------	---------	-----	---	---

Institution Information continued:

Spring 2024 Lubbock Medicine
Administrative Dismissal Effective 01-11-2024
***** TRANSCRIPT TOTALS *****
INSTITUTION EhRs: 83.000 QPts: 0.000
GPA-Hrs: 0.000 GPA: 0.000

TRANSFER EhRs: 0.000 QPts: 0.000
GPA-Hrs: 0.000 GPA: 0.000

OVERALL EhRs: 83.000 QPts: 0.000
GPA-Hrs: 0.000 GPA: 0.000
***** END OF TRANSCRIPT *****


Amanda McSweeney, Registrar

Gmail - You've Received A Document: [REDACTED]



Kevin Bass [REDACTED]

You've Received A Document: [REDACTED]

1 message

Parchment <noreply@mail.parchment.com>
Reply-To: noreply@mail.parchment.com
To: Kevin Bass [REDACTED]

Thu, Oct 16, 2025 at 9:28 PM

You've received a Transcript

Texas Tech University Health Sciences Center has sent you a Transcript with the Parchment Delivery ID (DID) [REDACTED] on behalf of **Kevin Bass**. This Transcript is available for you to download for 30 days, so your prompt attention is requested. The requestor of this document will receive an email notification once you access the Transcript.

Access the Transcript

If the button above does not work, copy and paste the following URL in a browser window:

[https://receive.parchment.com/delivery?token=5a2fb5c5-6081-49da-9d64-0151643f7224&email=\[REDACTED\]](https://receive.parchment.com/delivery?token=5a2fb5c5-6081-49da-9d64-0151643f7224&email=[REDACTED])

Thank you,
The Parchment Team

Gmail - You've Received A Document: [REDACTED]

Turn Credentials into Opportunities

Please do not respond to this message. This notification has been sent to you by Parchment on behalf of the Requestor noted above.

We're here if you need us

Explore the [Parchment Help Center](#) for comprehensive articles, FAQs, and support resources.

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Withheld: correspondence with another university

Exhibit 4

Third-Party Defamatory Publications

Social media posts containing false and defamatory statements about Plaintiff's dismissal from medical school.

Bass v. Texas Tech University Health Sciences Center

- Selected Third-Party Publications

Date	Author Handle	Content Snippet	Claim Tags	Category
2025-08-11	ryanmarino.bsky.social	States that Plaintiff had sexual-harassment complaints and had made threats of violence before being 'kicked out' of medical school; frames dismissal as unrelated to 'woke' politics.	Alleges sexual harassment and threats of violence; claims he was kicked out.	Expulsion/Dismissal
2025-09-07	ryanmarino.bsky.social	Describes Plaintiff as unemployed and not a physician because he was 'kicked out of med school for sexual harassment and threats of physical violence,' while highlighting an HHS account retweet.	Alleges sexual harassment and threats of physical violence; says he's not a physician; cites official amplification.	Expulsion/Dismissal
2025-08-28	panaccindex.bsky.social	States that Plaintiff was expelled from medical school for sexual misconduct and labels him a 'eugenicist creep.'	Alleges expulsion for sexual misconduct; labels him a 'eugenicist creep.'	Expulsion/Dismissal
2024-09-19	mementomorty.bsky.social	Says Plaintiff was kicked out of medical school, calling him a 'right-wing grifting [expletive]' and 'creepy to female nurses.'	Says he was kicked out; calls him creepy to female nurses.	Expulsion/Dismissal
2025-04-30	panaccindex.bsky.social	Claims credit—'we are very happy'—for getting Plaintiff expelled from med school.	Takes credit for getting him expelled from medical school.	Expulsion/Dismissal
2025-10-02	quackdetector.bsky.social	States that Plaintiff was 'kicked out of medical school 2 years ago' and accuses him of 'cosplaying doctor.'	Says he was kicked out; accuses him of 'cosplaying doctor'.	Expulsion/Dismissal
2025-08-04	panaccindex.bsky.social	Says 'I am the reason' Plaintiff was expelled from medical school.	Claims 'I am the reason he was expelled' from med school.	Expulsion/Dismissal
2023-05-15	mcbazacophd.bsky.social	Speculates that Plaintiff wants to get himself kicked out of medical school so he can 'cash out' on controversy.	Accuses him of trying to get kicked out to cash out.	Expulsion/Dismissal
2025-02-13	blitelhecheese.bsky.social	Imputes harassment of nurses in response to Plaintiff's posts.	Imputes harassment of nurses.	Misconduct (Sex/Threats)
2025-09-13	panaccindex.bsky.social	Says that after being expelled for sexual misconduct and being quote-tweeted by HHS, Plaintiff is now 'posting physical threats' on social media.	Alleges expulsion for sexual misconduct and posting physical threats.	Misconduct (Sex/Threats)
2024-02-04	zappit.bsky.social	Calls Plaintiff a 'notorious disinformation peddler' and 'dismissed medical student,' claims he 'got kicked out of school,' and asserts he is only allowed on campus with a police escort due to threats, saying 'the school made flyers.'	Says school only allows campus access with police escort due to threats.	Expulsion/Dismissal
2025-10-02	fugekgs.medsky.social	References 'the rumor why he was expelled from med school' in context of alleged doxxing attempt.	Rumor context: 'NOT Kevin BASS'—references expulsion rumor.	Expulsion/Dismissal

Exhibit 4A - Reddit Evidence (H-37)

Evidence Metadata

Evidence Id: H-37

Platform: Reddit

Subreddit: r/medicine

Thread Title: Kevin Bass Discussion Thread

Canonical Url: <https://www.reddit.com/r/medicine/comments/...>

Capture Date: 2025-12-01

Description: Reddit thread containing defamatory statements about Plaintiff's medical school dismissal.

Chain of Custody

Captured and preserved using ArchiveWeb.page and replayed via WACZ/PDF with SHA-256 hashing. Canonical URLs and hash values are maintained in a manifest and authenticated in the Digital Evidence Custodian declaration. All timestamps in this re UTC.

Medical School COMMENTS

All Step I/II and ERAS related discussion should be posted in the respective stickied thread. [Read the rules here.](#)

Welcome to Reddit,
the front page of the internet.

BECOME A REDDITOR
and join one of thousands of communities.

Shitpost He had so many opportunities to just stop tweeting.

Manoj_Malhotra **M-2**
312 comments share save hide report

Want to add to the discussion?
Post a comment!

CREATE AN ACCOUNT

You are viewing a single comment's thread.
[View the full thread of comments.](#)

Desmitty9 **DO-PGY3** 226 points
One of my buddies matched at a residency program at Texas Tech. He actually told me they got a vague email about not letting this student onto campus because of threats he made on Twitter to the school.
Edit - I just asked them about it again. So maybe not threats to the school but general threats with a history of harassing resident(s) and an attending.

bearybear90 **MD-PGY1** 52 points
What the fuck

Spetzfoos **MD-PGY1** 42 points
This guy sounds unhinged and who knows how many people now listen to his "opinions" to validate their viewpoints

Flappy_Penguin **M-4** 30 points
He was saying something to the effect of, "everyone will die, some sooner than others" which put the school on high alert.

MikiLove **DO** 14 points
Wait was he actually a student there or just pretending to be?

Desmitty9 **DO-PGY3** 35 points
He was on rotation and got pulled.

MikiLove **DO** 20 points
Omg I can't imagine this guy being on a rotation with me

can-i-be-real **MD-PGY1** 13 points
Just imagine how great your evals would be when they compared you to him!

slytherinOMS **DO** 2 points
Thanks for the laugh. Needed it.

794 points (97% upvoted)
shortlink: <https://redd.it/1r9gyn>

Get an ad-free experience with special benefits, and directly support Reddit.
Get Reddit Premium

Medical School

Don't want to see memes and shitposts?

Only want to see memes and shitposts?

See ALL the content!

RULES

- 1. Don't be an asshole**
Be respectful to your fellow medical students. Rude and/or aggressive behavior will not be tolerated on this sub. All forms of racism, sexism, homophobia, transphobia, etc. will be removed, possibly resulting in a ban.
- 2. No pre-med content**
Please keep all topics relevant to current medical students. All pre-med related content belongs on [r/premed](#).
- 3. No Medical Advice Questions**
This forum is not a place to ask for personal medical advice. Any posts asking for second opinions, diagnoses, interpretation of personal labs/imaging, etc. will be immediately removed. A more appropriate subreddit is [r/AskDocs](#).
- 4. No filesharing**
Filesharing is prohibited in this subreddit. This includes discussion of filesharing or sources of pirated or copyrighted materials. Anki-related discussion belongs on [r/medicalschooloranki](#) or [r/Anki](#). Discussion related to other resources belongs on [r/Step1](#) or another related sub.
- 5. No Troll posts/comments**
Trolls will not be tolerated. Previous examples of troll posts involved users seeking "help" on mundane

Ex. H-37 —

-  **slytherinOMS** DO 2 points
 Thanks for the laugh. Needed it.
-  **Bauermeister** 1 point
<https://www.panaccindex.info/p/what-you-can-learn-from-kevin-bass>
-  **Bauermeister** 1 point
 Yes <https://www.panaccindex.info/p/what-you-can-learn-from-kevin-bass>
-  **sssmorgann M-3** 3 points
 There was a bolo for him and he was banned from the hospital after he posted vague threats (mass shooter vibes tbh) on twitter
-  **Bauermeister** 1 point
 Here <https://www.panaccindex.info/p/what-you-can-learn-from-kevin-bass>
-  **Jorge_Santos69** 1 point
 I'm just now reading about all this and giggling. Fuuuuuuck this guy and his embarrassing downfall is completely deserved.
-  **Bauermeister** 1 point
 I can help with that <https://www.panaccindex.info/p/what-you-can-learn-from-kevin-bass>

5. No Troll posts/comments

Trolls will not be tolerated. Previous examples of troll posts involved users seeking "help" on mundane or sensitive personal issues. These posts often include an immature or sophomoric subtext. Moderator discretion is used to determine and remove posts of this nature.

6. No off-topic posts or comments

Overtly off-topic posts and comments will be removed. While we enjoy humor, please keep your memes relevant to medical school. Keep your personal politics off our sub.

7. No advertising/self-promotion

Do not share your blog, vlog, YouTube channel, website, Discord channel, business, etc. Should you wish to advertise a service or product, consider buying a sponsored link from reddit. If you have a **free** product you believe would really help medical students, message the mods for prior approval to posting.

8. No AMA-style posts without moderator approval

AMA-style posts are not allowed without prior moderator approval.

9. No research/surveys without moderator approval

At this time, research and/or surveys are not allowed on our sub. There are no exceptions to this rule. If we ever decide to lift this rule, the normal rules regarding recruitment for research studies can be found on [this page](#).

10. Use the stickied posts

Please limit posts concerning USMLE Step 1 or 2 to their respective stickied threads. Posts not following this rule will be deleted.

11. Karma/Account Age requirement

In order to help reduce spam on our subreddit, users must have at least 10 comment karma in order to participate on [r/medschool](#), and all accounts must be at least 72 hours old. To gain karma, post comments on other subreddits and gain upvotes. Check out [r/FreeKarma4You](#) if you're really desperate.

12. IRC and Chat Channels

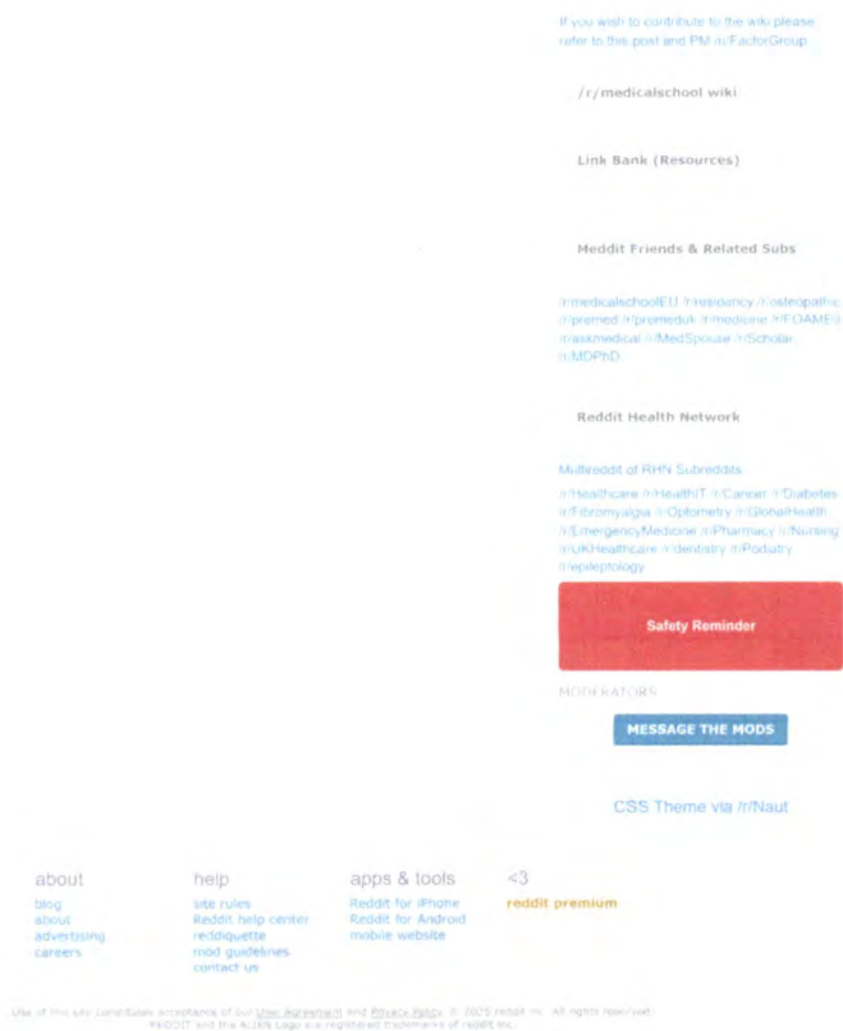
Moderation issues related to the IRC channel should be directed at the mods of the respective channel. The moderators of the [r/medschool](#) subreddit do not officially sanction/endorse any channel or take responsibility for any happenings within any channel.

IRC Channel: [irc.snoonet.org port 6667 #medschool](#), or click [HERE](#)

This IRC channel is an entity that is independent of this subreddit listed here for the convenience of the community. The moderators of [r/medschool](#) do not endorse/sanction said channel or bear any responsibility for any happenings within said channel. For moderation issues that arise there contact the moderators of the channel and not the moderators of [r/MedicalSchool](#).

If you wish to contribute to the wiki please refer to [this post](#) and PM [u/FactorGroup](#).

Ex. H-37 —



Demonstrative Enlargement — Ex. H-37 (cropped from Page 1; scaling only; no pixel-level edits)

You are viewing a single comment's thread.
[view the rest of the comments →](#)

Desmitty9 **DO-PGY3** 226 points · 1 year ago · 1 reply · 1 vote · 1 reply

One of my buddies matched at a residency program at Texas Tech. He actually told me they got a vague email about not letting this student onto campus because of threats he made on Twitter to the school.

Edit - I just asked them about it again. So maybe not threats to the school but general threats with a history of harassing resident(s) and an attending.

Ex. H-37 —

Exhibit 4B - Bluesky Evidence (H-50 Set)

Evidence Metadata

Evidence Set: H-50 (Bluesky Posts)
Platform: Bluesky
Capture Date: 2025-12-01
Posts Count: 3 posts (B2, B3, B12, B13)

Chain of Custody

Captured and preserved using ArchiveWeb.page and replayed via WACZ/PDF with SHA-256 hashing. Canonical URLs and hash values are maintained in a manifest and authenticated in the Digital Evidence Custodian declaration. All timestamps in this re UTC.

Posts in This Set

H-50-B2

Handle: panaccindex.bsky.social
Date: 2025-08-04
Categories: Expulsion/Dismissal, Taking Credit
Content (sanitized): Says 'I am the reason' Plaintiff was expelled from medical school.

H-50-B12

Handle: ryanmarino.bsky.social
Date: 2025-09-07
Categories: Sexual Harassment, Threats of Violence, Not a Physician
Content (sanitized): Asserts that Plaintiff was 'kicked out of med school for sexual harassment and threats of physical violence' and is not a physician, while highlighting an HHS account retweet.

H-50-B13

Handle: ryanmarino.bsky.social
Date: 2025-08-11
Categories: Sexual Harassment, Threats of Violence, Expulsion
Content (sanitized): States that Plaintiff had sexual-harassment complaints and had made threats of violence before being 'kicked out' of medical school; frames dismissal as unrelated to 'woke' politics.

Platform: Bluesky

Type: Bluesky Publication (Post)

Author: Zappit (@zappit.bsky.social)

Posted: February 04, 2024 at 00:04:15 UTC

URL: <https://bsky.app/profile/zappit.bsky.social/post/3kkkgez2w2t2j>

Engagement: 3 likes

Categories: Threats/Violence, Professional Incompetence, Police/Security, Institutional Pressure

Content Preview:

"Wow. Notorious disinformation peddler and now dismissed medical student Kevin Bass is not only got kicked out of school and likely blew up his own career, but he's only allowed to set foot on campus with a police escort due to threats he's made online and in person. The school made flyers!"

Source File:

File: H-50-B3_fullpage.png

Type: PNG

Generated: 2025-12-08 00:35:56

Draft Exhibits - Publication/Defamation Suggest Claims



Exhibit 4 - Page 13 or 17

Platform: Bluesky

Type: Bluesky Publication (Post)

Author: Ryan Marino, MD (@ryanmarino.bsky.social)

Posted: September 07, 2025 at 06:10:19 UTC

URL: <https://bsky.app/profile/ryanmarino.bsky.social/post/3ly7zqj7xvs2z>

Engagement: 294 likes, 67 reposts

Categories: Threats/Violence, Sexual Misconduct, Professional Incompetence, Institutional Pressure

Content Preview:

"Here's our official Health & Human Services account retweeting an unemployed perverted loser, who is not a physician because he was kicked out of med school for sexual harassment and threats of physical violence, while he makes fun of a woman for the way she talks about her own, very real, expertise"

Source File:

File: H-50-B12_fullpage.png

Type: PNG

Generated: 2025-12-08 00:35:56

Draft Exhibits - Publication/Defamation Stigma Claims

ADULT CEMENT

Here's our official Health & Human Services account reuniting an unemployed perverted loser, who is not a physician because he was kicked out of med school for sexual harassment and threats of physical violence, while he makes fun of a woman for the way she talks about her own, very real, impotence.



PHS 2003-1001



Follow-up

Never again.



Merlin Batus PhD MS

Mandy Cohen, former CDC Director, talking and laughing about how she made policy decisions during COVID.

How big is it?



11.0307

Platform: Bluesky

Type: Bluesky Publication (Quote Post)

Author: Ryan Marino, MD (@ryanmarino.bsky.social)

Posted: August 11, 2025 at 04:27:46 UTC

URL: <https://bsky.app/profile/ryanmarino.bsky.social/post/3lw3xgbeaac2y>

Engagement: 588 likes, 119 reposts

Categories: Threats/Violence, Sexual Misconduct, Professional Incompetence, Institutional Pressure

Content Preview:

"It's always the same story when they blame 'woke.' Kevin Bass received sexual harassment complaints and had made threats of violence before he was kicked out of medical school. It wasn't anything to do with his right-wing science denialism or his underlying scientific illiteracy and pick-me behavior"

Source File:

File: H-50-B13_fullpage.png

Type: PNG

Generated: 2025-12-08 00:35:56

Draft Exhibit: Publication/Defamation/Stigma Claims

58 Richard Brinsley Peart's Experiences in the 1910s
Chronic Illnesses of Richard Peart's Childhood and the 1910s

Richard Peart

Ryan Marlow, MD

9

It's always the same story when they blame "wolves." Even Bass
received sexual harassment complaints and had made threats of
violence before he was kicked out of medical school. It wasn't
anything to do with his right-wing science denialism or his
underlying scientific illiteracy and pick me behavior.

Aug 11, 2023 at 04:27 AM EDT
All rights reserved. All rights reserved.

EXHIBIT 4 - Page 17 of 17

Exhibit F

Exhibit F - Publication Crosswalk

Mapping of internal TTUHSC communications to external public statements, providing evidence that officials leaked stigmatizing information.

(See following pages)

Exhibit F - Publication Crosswalk - Data Table

Internal Source Date	Internal Phrase (exact quote)	External Appearance (where/when+URL)	Access-limited Insiders	Why Officials Are the Source
2023-12-27	"Board unanimously recommends a Non-Academic Dismissal of Dr. Bass for violating the Code of Conduct, in accordance with Part II.G.2.g. In addition, the Board unanimously recommends Dr. Bass be dee..."	Discord post by @ModelAyshaMirza on 2024-01-01 10:20 AM: "we did it, Kevin Bass' medical committee voted to expel him." Preserved as Discord_ModelAyshaMirza_2024-01-01_Medical_Committee_Vote_to_Exp...	Student Conduct Board; Interim Dean (SOM); Student Conduct Administrator; Dean's designees; Office of General Counsel; limited SOM administration.	The dismissal recommendation was non-public and circulated to a small group on 12/27/23. Within 5 days, a public post repeated the distinctive procedural phrasing ('medical committee voted to expel...
2023-12-27	"Based on input from the Threat Assessment Team, Simon Williams, PhD, Senior Associate Dean for Academic Affairs, determined that Dr. Bass's behavior justified his emergency removal from the TTUHSC..."	Reddit (r/medicalschoo) comment: "a buddy at Texas Tech residency received a vague email about not letting the student onto campus due to threats made on Twitter; upon follow-up, clarified as gene..."	Threat Assessment Team; Senior Associate Dean; Security/Police; Student Conduct Administrator; Dean's Office; GME leadership; Office of General Counsel.	'Emergency removal' and Threat Assessment Team involvement are insider-only terms. The public comment describes a residency-wide 'do not let onto campus' email, matching the non-public campus-restr...
2023-12-27	"Dr. Bass is alleged to have engaged in unprofessional conduct during his Psychiatry clerkshi towards Resident A Psychiat , a resident in Psychiat	Reddit (r/medicalschoo) comment: "general threats with a history of harassing resident(s) and an attending."	Psychiatry Clerkship leadership; Student Conduct Administrator; Student Conduct Board; Dean's Office; OGC; interviewees in the conduct process.	The internal allegation references repeated contact with a Psychiatry resident; a public post echoes 'harassing residents and an attending' shortly thereafter. Overlap in actors and conduct, combin...
2024-01-07 07:46 (email header local time)	"we are one student lighter than last week ... if anyone has any further questions, just check his Twitter; I am sure he will update everyone." (Mass broadcast from Assistant Vice Dean, Student Affal...	Official Student Affairs broadcast email itself sent to 'Class of 2025 Lubbock COV' and 'Class of 2024 Lubbock COV', cc: 'Jennifer Wilson'. Preserved as Exhibit_G_Forbes_Ema il_VACATION_and_other_stu...	Assistant Vice Dean, Student Affairs (sender); Student Affairs list owners; Class lists; Pediatrics leadership (cc).	Direct official dissemination: Student Affairs broadcast the dismissal status to two class lists and directed recipients to Plaintiff's Twitter; system shows a recall request. Confirms institutiona...

Exhibit F Crosswalk (Card Format, Clean)

Rows: 6 | Columns: 5

One row per page with wrapped text and generous spacing.
Continuation pages are added automatically for long rows.

Row 1 of 6

Internal Source Date:

2023-12-27

Internal Phrase (exact quote):

"Board unanimously recommends a Non-Academic Dismissal of Dr. Bass for violating the Code of Conduct, in accordance with Part II.G.2.g. In addition, the Board unanimously recommends Dr. Bass be deemed unfit to continue the study of medicine pursuant to Section 10 of the SOM OP 40.04 and dismissed from the SOM." (Determination Excerpts)

External Appearance (where/when+URL):

Discord post by @ModelAyshaMirza on 2024-01-01 10:20 AM: "we did it, Kevin Bass' medical committee voted to expel him." Preserved as Discord_ModelAyshaMirza_2024-01-01_Medical_Committee_Vote_to_Expel.png/pdf.

Access-limited Insiders:

Student Conduct Board; Interim Dean (SOM); Student Conduct Administrator; Dean's designees; Office of General Counsel; limited SOM administration.

Why Officials Are the Source (timing/unique language):

The dismissal recommendation was non-public and circulated to a small group on 12/27/23. Within 5 days, a public post repeated the distinctive procedural phrasing ('medical committee voted to expel'), which mirrors the internal action and would be known only to that limited circle at that time.

Row 2 of 6

Internal Source Date:

2023-12-27

Internal Phrase (exact quote):

"Based on input from the Threat Assessment Team, Simon Williams, PhD, Senior Associate Dean for Academic Affairs, determined that Dr. Bass's behavior justified his emergency removal from the TTUHSC campus under the Code of Conduct because 'the physical or emotional well-being of a student or other members of the University community could be endangered or the presence of the student could significantly disrupt the normal operations of the university.'" (Determination Excerpts)

External Appearance (where/when+URL):

Reddit (r/medicalschoo) comment: "a buddy at Texas Tech residency received a vague email about not letting the student onto campus due to threats made on Twitter; upon follow-up, clarified as general threats with a history of harassing resident(s) and an attending."

Access-limited Insiders:

Threat Assessment Team; Senior Associate Dean; Security/Police; Student Conduct Administrator; Dean's Office; GME leadership; Office of General Counsel.

Why Officials Are the Source (timing/unique language):

'Emergency removal' and Threat Assessment Team involvement are insider-only terms. The public comment describes a residency-wide 'do not let onto campus' email, matching the non-public campus-restriction rationale and audience.

Row 3 of 6

Internal Source Date:

2023-12-27

Internal Phrase (exact quote):

"Dr. Bass is alleged to have engaged in unprofessional conduct during his Psychiatry clerkship by expressing romantic feelings towards Resident A, while Dr. Bass and Resident A were working together and then refusing to respect Resident A's lack of interest by repeatedly contacting Resident A."

External Appearance (where/when+URL):

Reddit (r/medicalschooll) comment: "general threats with a history of harassing resident(s) and an attending."

Access-limited Insiders:

Psychiatry Clerkship leadership; Student Conduct Administrator; Student Conduct Board; Dean's Office; OGC; interviewees in the conduct process.

Why Officials Are the Source (timing/unique language):

The internal allegation references repeated contact with a Psychiatry resident; a public post echoes 'harassing residents and an attending' shortly thereafter. Overlap in actors and conduct, combined with limited access, supports inference to officials.

Row 4 of 6

Internal Source Date:

2024-01-07 07:46 (email header local time)

Internal Phrase (exact quote):

"we are one student lighter than last week ... if anyone has any further questions, just check his Twitter; I am sure he will update everyone." (Mass broadcast from Assistant Vice Dean, Student Affairs, subject "VACATION and other stuff"; recall requested.)

External Appearance (where/when+URL):

Official Student Affairs broadcast email itself sent to 'Class of 2025 Lubbock COV' and 'Class of 2024 Lubbock COV', cc 'Jennifer Wilson'. Preserved as Exhibit_G_Forbes_Email_VACATION_and_other_stuff_Combined_v2.pdf.

Access-limited Insiders:

Assistant Vice Dean, Student Affairs (sender); Student Affairs list owners; Class lists; Pediatrics leadership (cc).

Why Officials Are the Source (timing/unique language):

Direct official dissemination: Student Affairs broadcast the dismissal status to two class lists and directed recipients to Plaintiff's Twitter; system shows a recall request. Confirms institutional publication and supports injunctive relief.

Exhibit G

Exhibit G - January 7, 2024 Forbes Email (VACATION and other stuff)

Class-wide broadcast from Assistant Vice Dean stating 'we are one student lighter' and directing recipients to 'check his Twitter.'

(See following pages)

Forbes, Rachel would like to recall the message, "VACATION and other stuff".



Forbes, Rachel

Sun 1/7/2024 7:46 AM

To: Class of 2025 Lubbock COV; Class of 2024 Lubbock COV

Cc: Wilson, Jennifer E

Reply all

Action Items

Good Morning,

As many of you know, I am heading out on a much-needed vacation, but I realized that I had not updated many of you on a few things, so here are all the things.

First, I am sure everyone is aware by now, but we are one student lighter than last week, and I hope we can all breathe a sigh of relief. Obviously, this has been trying on us all, and I want to thank everyone who stopped by, texted, and called to check in on me—I can honestly say that this past year has been the most difficult of my career thus far (I sure hope I do not have another year like that again). If anyone has any further questions, just check his Twitter; I am sure he will update everyone.

Second, as of December 1st, Dr. Nunez is no longer the Assistant Vice Dean on our campus. While I appreciated his tenure, I am extremely excited to announce Dr. Jennifer Wilson has replaced him!! She has already been digging in and I know she will be a huge asset to me and each of you. Her office hours will vary until she transitions out of the million shifts she covers at the hospital but she is always available via cell or email. She will remain as the Pediatrics Clerkship Director, and she is a City of Lubbock Councilwoman, so she is very busy but very organized. Please congratulate her and exciting things to come!

MS3's

I trust everyone is overwhelmed with figuring out your MS4 schedule and what you want to do with your life—take a deep breath and hang on. It will only get rougher, BUT you know we are walking this together! If you have not signed up to have your meeting with Christina or me, then you need to ASAP. I know many of you are still undecided on your career path, but that is OK. Listen to Christina; she has done a few rodeos and will provide you with guidance on how to move forward if you are unsure. I will see each of you when I get back.

MS4's

I know many of you are either finished or finishing your residency interviews—YAY! We have a meeting scheduled delivered via Dr. Cobbe, and I usually have a small one for just us I have not scheduled that yet, but I will soon. If

 All Inboxes**Siri Found a Contact**

Forbes Rachel

rachel.forbes@ttuhsc.edu

Add**Forbes Rachel**

Sunday

To: Class, Class Cc: Jennifer >

VACATION and other stuff

Good Morning,

As many of you know, I am heading out on a much-needed vacation, but I realized that I had not updated many of you on a few things, so here are all the things.

First, I am sure everyone is aware by now, but we are one student lighter than last week, and I hope we can all breathe a sigh of relief.

Obviously, this has been trying on us all, and I want to thank everyone who stopped by, texted, and called to check in on me—I can honestly say that this past year has been the most difficult of my career thus far (I sure hope I do not have another year like that again). If anyone has any further questions, just check his Twitter; I am sure he will update everyone.



Exhibit C - Page 2 of 4



< All Inboxes **VACATION an...**

Second, as of December 1st, Dr. Nunez is no longer the Assistant Vice Dean on our campus. While I appreciated his tenure, I am extremely excited to announce Dr. Jennifer Wilson has replaced him!! She has already been digging in and I know she will be a huge asset to me and each of you. Her office hours will vary until she transitions out of the million shifts she covers at the hospital but she is always available via cell or email. She will remain as the Pediatrics Clerkship Director, and she is a City of Lubbock Councilwoman, so she is very busy but very organized. Please congratulate her and exciting things to come!

MS3's

I trust everyone is overwhelmed with figuring out your MS4 schedule and what you want to do with your life—take a deep breath and hang on. It will only get rougher, BUT you know we are walking this together! If you have not signed up to have your meeting with Christina or me, then you need to ASAP. I know many of you are still undecided on your career path, but that is OK. Listen to Christina; she has done a few rodeos and will provide you with guidance on how to move forward if you are unsure. I will see each of you when I get back.



Exhibit 5

ADA / Section 504 Documentation

Neuropsychological evaluation summary, ADA notice to TTUHSC, and disability accommodation policies.

Bass v. Texas Tech University Health Sciences Center

Withheld: medical information

Withheld: medical information

- ADA Notice & Hearing Quotes (D-1, D-2)

— Hearing Statements (ADA/§504 & SDS Process)

Source: Notes + firsthand recollection of statements made during the hearing on December 11, 2023. I do not possess the official audio or transcript. If and when the University produces the official record, I will conform page/line or timestamps.

Purpose: Show (i) ADA routing to SDS; (ii) redaction of disability evidence; (iii) exclusion of a disability witness; (iv) limits on questioning (written-only via presider); and (v) statements by University-affiliated personnel. These points support my requested guardrails (neutral presider, 7-day exchanges, time parity, recording) and admission of disability evidence (unredacted evaluation under protective order; neuropsychologist testimony).

SDS is the official ADA channel

I recall the Chair stated: "Our process is normally to go through Student Disability Services; that office makes these decisions."

Speaker: Hearing Officer/Chair

Session: Day 1 – Morning

ADA request "no attachment" comment

I recall the Chair stated: "I have not seen that... you emailed me an email that does not have an attachment."

[Notice: SDS received the evaluation on Friday (Ex. D-1).]

Speaker: Hearing Officer/Chair

Session: Day 1 – Morning

Breaks/snacks offered; no communication/process accommodations

I recall the Chair stated: "We have water in the room... there are snacks... if you need any breaks, please ask."

Speaker: Hearing Officer/Chair

Session: Day 1 – Morning

No active attorney questioning (written questions only)

I recall the Chair stated: "Advisors cannot ask questions of witnesses directly... you may provide questions in writing to me." [See Hearing Rules (Ex. D-3).]

Speaker: Hearing Officer/Chair

Session: Day 1 – Morning

Neuropsych evaluation withheld/redacted

I recall the Chair stated: "A redacted portion of the healthcare provider's document will be provided to the panel before deliberations." [See also Determination excerpts (Ex. B).]

Speaker: Hearing Officer/Chair

Session: Day 1 – Morning

Neuropsychologist testimony excluded

I recall the Chair ruled: "I'm not going to allow that testimony."

Speaker: Hearing Officer/Chair

Session: Day 1 – Morning

Context – Statements by University-affiliated personnel

I recall the Professionalism Coach said: "[Psychologist] you are probably [REDACTED] you lack political intelligence about how your behaviors and words impact others."

Speaker: Professionalism Coach

Session: Day 1 – Afternoon

Authentication request: If any wording is disputed, please produce the official audio/stenographic record or written transcript within 3 business days, and I will conform page/line.

- Student Disability Services Policy & Technical Standards

TTUHSC policies governing ADA/Section 504 accommodations and medical school technical standards.

Only those pages directly addressing ADA/§504 accommodations and technical-standards expectations are included here.

(See following pages)



TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER

Operating Policy and Procedure

HSC OP: 77.14, **Establishing Reasonable Accommodations for Students with Disabilities**

PURPOSE: The purpose of this Health Sciences Center Operating Policy and Procedure (HSC OP) is to outline the procedures for establishing reasonable accommodation for students with disabilities.

REVIEW: This HSC OP will be reviewed by November 1 of even-numbered years (ENY) by the Office of General Counsel and the Director of Student Disability Services, with recommendations for revision forwarded to the Associate Provost for Student Affairs by December 1.

POLICY/PROCEDURE:

1. Background

- a. The Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. § 12101 *et seq.*, as amended) mandates equal opportunities for persons with disabilities in all public facilities, programs, activities, services, and benefits derived from them. Title V, Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794 *et seq.*), as amended, mandates equal opportunity for qualified persons with disabilities in all programs, activities, and services of recipients of federal financial assistance. Both ADA and Section 504 of the Rehabilitation Act are civil rights statutes that prohibit discrimination on the basis of disability, if applicable, obligate colleges and universities to make certain adjustments and accommodations and offer to persons with disabilities the opportunity to participate fully in all institutional programs and activities. Texas Tech University Health Sciences Center (TTUHSC) adheres to these laws and regulations as well as the Texas Commission on Human Rights Act.

2. Faculty Notice

- a. Faculty members are encouraged to insert the following statement into each course syllabus:

Any student who, because of a disability, may require special arrangements in order to meet course requirements should present a Letter of Accommodation from Student Disability Services to the course instructor (or program director). Please note that instructors are not allowed to provide classroom accommodation to a student without appropriate verification from Student Disability Services. For additional information, please contact _____ lity Services in Academic Classroom Building 2C400 (Lubbock), by telephone [redacted phone] , or by email disabilityservices@ttuhsc.edu.

3. Eligibility and Procedures for Establishing Reasonable Accommodations

- a. A student must register with Student Disability Services and file appropriate documentation in order to be eligible for any disability benefits and services described in this operating policy.
- b. The university-approved mechanism for establishing reasonable accommodation is written notification in the form of a Letter of Accommodation (LOA) from the Student Disability Services.

The LOA indicates to faculty that the student has provided proof of their disability and that the accommodation noted is considered appropriate and reasonable. Accommodations are considered reasonable as paired with the essential functions in each program and students should be aware of the specific nature of the curriculum within the various schools at TTUHSC. No further proof of disability should be required of the student. Students presenting other kinds of verification should be referred to the Student Disability Services for the appropriate identification.

No requirement exists that accommodation be made prior to completion of the approved university process. Classroom accommodations should be implemented within 1 week (5 business days) of the student and faculty discussing implementation.

- c. A list of service providers that conduct assessments, render diagnoses, and make recommendations for accommodations for students can be found on the Student Disability Services website or requested from the staff. Student Disability Services at TTUHSC does not endorse any particular service provider. Addresses and phone numbers are subject to change.

Before selecting a qualified professional, ask what their credentials are, what experience they have working with adults with learning disabilities and/or [REDACTED] and if they have worked with Student Disability Services at TTUHSC. If they have not, you may want to provide them the Documentation Guidelines found on the Student Disability Services website.

After the assessment has been completed, request a written copy as well as make an appointment to discuss the results and recommendations with the professional. Be sure to request additional resources if needed, and always keep a personal copy for your records.

In order to obtain accommodations at TTUHSC, a copy of the report (documentation) along with an application, should be provided to the Student Disability Services. Please allow up to two weeks to process a complete file.

- d. Faculty members are not required to provide accommodation for a student's disability needs unless the student provides a Letter of Accommodation from Student Disability Services. Ideally, Letters of Accommodation should be presented to instructors at the beginning of the semester; however, Letters of Accommodation may be submitted at any point during a semester. If an LOA is presented after a semester begins, the accommodation applies only from the date the LOA is presented to the faculty member. If the accommodation(s) are not implemented within 1 week (5 business days), the student shall immediately contact the Student Disability Services.
- e. Student Rights and Responsibilities is a document discussed with each student during the initial intake meeting. The Rights and Responsibilities document details the student's right to choose to use accommodations, the right to request adjustments at any time, and the right to have accommodations provided to them free of charge. This document also outlines the student's responsibility to follow the Code of Conduct regardless of disability, the responsibility to discuss accommodations with faculty in order to implement said accommodations, the responsibility to report any issues with accommodations back to Student Disability Services during the semester in which the issue arises, and the responsibility to request a Letter of Accommodation for each semester enrolled.
- f. Student Disability Services will maintain the confidentiality of all medical and ADA information concerning students. These records will be kept separate from personnel files and student educational records, and will be accessible only to authorized personnel.
- g. Temporary accommodations are extended to students with temporary disabilities only for the duration of their functional limitations associated with their disability.

The eligibility process is the same for a temporary disability as it is for a permanent disability. After reviewing documentation, Student Disability Services will determine appropriate accommodations dependent on temporary limitations the student has in the academic setting. Student Disability Services may also grant temporary services to a student who is working to obtain relevant documentation. Student Disability Services will review their file at the end of each semester in order to seek appropriate documentation or to substantiate further need for services.

4. Appeals Process for Denial of Services or Accommodations

Students who are denied services or denied a specific accommodation request by Student Disability Services may appeal the decision to the Associate Provost for Student Affairs. The decision of the Associate Provost for Student Affairs is the final ruling.

5. Right to Change Policy

TTUHSC reserves the right to interpret, change, modify, amend or rescind this policy in whole or in part at any time without the consent of employees, faculty or students.



TEXAS TECH UNIVERSITY
HEALTH SCIENCES CENTER

School of Medicine
Operating Policy and Procedure

- SOM OP:** 40.11 Technical Standards for Admission, Retention, and Graduation
- PURPOSE:** The purpose of this School of Medicine (SOM) Operating Policy is to explain the nonacademic standards of the SOM.
- REVIEW:** This SOM Operating Policy will be reviewed each odd-numbered fiscal year by the Curriculum and Educational Policy Committee. Revisions will be forwarded to the Office of the Dean for approval and publication.

POLICY/PROCEDURE:

1. **General.** The School of Medicine faculty has developed minimum standards for entry into and progression through the medical curriculum. These standards provide guidance to achieve the Doctor of Medicine degree in preparation for licensure as a practicing physician and for postgraduate training. Throughout the medical education process, patient safety is of primary consideration.

LCME Element 10.5: Technical Standards

A medical school develops and publishes technical standards for the admission, retention, and graduation of applicants or medical students in accordance with legal requirements.

2. **Definition:**
 - The term *technical standards* refers to all nonacademic requirements a medical school applicant or enrolled medical student must possess or be able to acquire, with or without reasonable accommodation, in order to be admitted to, be retained in, and graduate from any SOM program.
 - The term *student* refers to all medical school applicants or enrolled medical students of any SOM program.
3. **Technical Standards:**
 - a. As a component of the Texas Tech University Health Sciences Center (TTUHSC), the SOM is committed to equal educational opportunity and nondiscrimination consistent with [HSC OP 77.14](#).
 - b. Because graduation with an M.D. degree signifies the recipient is a physician prepared for entry into the practice of medicine within the U.S. graduate medical education and licensure framework, students in any of the SOM M.D. degree programs are expected to acquire a broad foundation of medical knowledge and skills that generally supports and facilitates this progression. According to the LCME, technical standards for admission, retention, and graduation of applicants or medical students are 1) essential academic and non-academic abilities, attributes, and characteristics in the areas of intellectual-conceptual, integrative, and quantitative abilities; 2) observational skills; 3) physical abilities; 4) motor functioning; 5) emotional stability; 6) behavioral and social skills; and 7) ethics and professionalism that a medical school applicant or enrolled medical student must possess or be able to acquire, with or without reasonable accommodation, in order to be admitted to, be retained in, and graduate from that school's medical educational program (Element 10.5). In addition, as students interact with patients throughout their medical education program, the SOM has an ethical responsibility for the safety of the patients with whom students and graduates will come in contact. Patient safety and well-being are, therefore, major factors in establishing

nonacademic requirements for admission, promotion, and graduation. As such, all students must meet or acquire certain technical standards with or without reasonable accommodations (Standard 10: Medical Student Selection, Assignment, and Progress; LCME, April 2022):

- **Observational skills:** A student must be able to demonstrate functional use of sensory systems, including vision, hearing, touch, and smell to be able to obtain a medical history and perform a complete physical examination in order to integrate findings based on these observations and to develop an appropriate diagnostic and treatment plan.
- **Communication:** Students should be able to communicate with patients, their families, colleagues, and all members of the health care team in order to elicit information, to detect changes in mood and activity, and to establish a therapeutic relationship. Students should be able to communicate via English effectively and sensitively with patients and all members of the health care team both in person and in writing.
- **Intellectual-conceptual, integrative, and quantitative abilities:** A student must be able to problem-solve effectively and rapidly, learn, reason, calculate, formulate and test hypotheses, memorize, process, analyze, rapidly integrate and synthesize information and apply information in an environment of high stress and distraction. A student must be able to make critical judgments based on evidence and experience.
- **Examination, Diagnostic, and Procedural Skills:** Candidates must possess the capacity to perform all medical and diagnostic procedures considered essential for the area of practice, including physical examinations and diagnostic maneuvers. They must be able to respond to emergent or urgent situations in a timely manner and provide general and emergency care. They must adhere to universal precaution measures and meet safety standards applicable to inpatient and outpatient settings and other clinical activities.
- **Behavioral and social skills:** Students should possess the emotional health required for full utilization of their intellectual abilities, the exercise of good judgement, the prompt completion of all responsibility's attendant to the diagnosis and care of patients, and the development of mature, sensitive, and effective relationships with patients, fellow students, faculty and staff. Students should be able to tolerate physically taxing workloads and to function effectively under stress. They should be able to adapt to changing environments, to display flexibility, and to learn to function in the face of uncertainties inherent in the clinical problems of many patients. Compassion, integrity, concern for others, interpersonal skills, professionalism, interest, and motivation are all personal qualities that are expected during the education processes.
- **Ethics and professionalism:** A student must exercise professional judgment and promptly complete all responsibilities attendant to their academic work, teamwork, and patient care. A student must respond appropriately and professionally under stressful situations, and maintain safe practice and sound clinical judgement. A student must accept formative feedback from others, and take personal responsibility for making appropriate positive changes. A student must demonstrate compassion and respect for human dignity and rights and safeguard patient confidences and privacy in accordance with HIPAA. A student should disseminate medical information that provides benefit to the patient first, without allowing competing considerations, beliefs or interests to take precedence.

4. Acceptance of Technical Standards

- a. If a candidate accepts an offer of admission, the candidate must then sign a form acknowledging that they have read this policy and that they are aware that the program's technical standards must be met with or without reasonable accommodation.

- b. All students must re-confirm their understanding of the expectations of this policy prior to beginning clinical rotations in Phase 2 of the curriculum.

5. Requests for Accommodations

- a. Requests for accommodation(s) must be submitted to the TTUHSC Student Disability Services. Requests for accommodations may be submitted at any point during a semester, including requests by students related to disabilities identified and/or acquired following matriculation. Requests are otherwise evaluated and managed according to [HSC OP 77.14](#).
- b. Requests for accommodation by external organizations (such as, but not limited to, the National Board of Medical Examiners) for any exams or assessments administered under their auspices are independent and additional processes for which the school is not responsible. Such requests, and any related expenses, are the responsibility of the student, and the TTUHSC Student Disability Services will support the student in the process.

Technical Standards for Admission, Retention, and Graduation

I certify that I have read and that I understand the **Technical Standards for Admission, Retention, and Graduation**.

I understand that I can meet the standards with or without reasonable accommodation.

I understand that I can request in writing any desired accommodation in order to meet these standards, including accommodation for a physical or mental impairment that substantially limits one or more major life activities, and must follow any specified procedures for evaluation in order to be considered for and receive accommodation ([Student Disability Services](#)).

I understand that while requests for accommodations may be submitted at any point during a semester, including requests related to disabilities identified and/or acquired following matriculation, they must be submitted in a timely manner to allow time to adequately coordinate accommodation services.

Signature _____

Printed Name _____

Date _____

This form will be completed online

Exhibit 6

Name-Clearing Evidence

Documentation supporting Plaintiff's request for a name-clearing hearing.

Bass v. Texas Tech University Health Sciences Center

Case No. 5:25-cv-00028-H

Exhibit 6

10/29/25, 1:26 PM

Gmail - Request for Name-Clearing Hearing, Interim Transcript Relief, ADA/Section 504 Accommodations, and Preservation



Kevin Bass <kbassphiladelphia@gmail.com>

Request for Name-Clearing Hearing, Interim Transcript Relief, ADA/Section 504 Accommodations, and Preservation

Kevin Bass <kbassphiladelphia@gmail.com>

Sun, Oct 19, 2025 at 2:35 AM

Reply-To: kbassphiladelphia@gmail.com

To: registrar@ttuhsc.edu, disabilityservices@ttuhsc.edu, eric.bentley@ttu.edu, John.DeToledo@ttuhsc.edu,

somosa@ttuhsc.edu, LubbockGME@ttuhsc.edu

Cc: rachel.forbes@ttuhsc.edu, lauren.cobbs@ttuhsc.edu

Bcc: [personal recipient], Kevin Bass <kbassphiladelphia@gmail.com>

Please reply 'Received'.

Dear Officials,

I request a NAME-CLEARING HEARING to address stigmatizing statements the University made and disseminated in connection with my dismissal. Some allegations were aired during internal proceedings and then repeated publicly, even when not reflected in a final decision letter. *These statements are false and continue to cause ongoing harm to my reputation, training, and career.*

Why a separate name-clearing hearing is required. The earlier student-conduct proceeding did not provide a meaningful opportunity to clear my name regarding the stigmatizing statements later disseminated: accommodations were treated as "outside the scope" despite ADA notice to SDS, key defense witnesses were not permitted, and cross-examination was curtailed (Ex. B; Ex. D-1/D-2). In particular, the hearing officer admitted my neuropsychological evaluation but redacted the accommodations section as not within the Board's scope, and the Board stated the diagnosis was not a basis for retroactive leniency and claimed it was not disclosed until the morning of the hearing—contrary to my December 8, 2023 ADA notice (Ex. B; Ex. D-1). A name-clearing hearing is distinct and narrowly addresses the public statements.

Public repetition underscores urgency. Within days of the non-public committee action, two public/official publications circulated: (i) on January 1, 2024, a public post stated that my medical committee voted to expel me (see Exhibit F, Row 1), and (ii) on January 7, 2024 at 7:46 a.m., the Assistant Vice Dean for Student Affairs sent a class-wide broadcast stating "we are one student lighter than last week" and instructing recipients to "check his Twitter" for updates; the system shows a recall request for that message (Exhibit G). In the same period, Exhibit F (Rows 2–4) documents residency/GME messaging that described campus-access restrictions (e.g., do not let [student] onto campus, "BOLO," site bans, "rotation pulled") and insider phrasing about "harassing resident(s) and an attending," confirming broad, stigmatizing dissemination.

Continued reuse. Public reuse of insider phrasing— including August 2025 posts repeating "sexual harassment complaints," "threats of violence," and "sexual misconduct"— continues as of October 2025 (see Exhibit F, Rows 5–6 and preserved screenshots).

Practical, ongoing harm. I am presently pursuing professional and funding opportunities where reputation and official academic records

Exhibit 6 - Page 3 of 9

10/29/25, 1:26 PM

Gmail - Request for Name-Clearing Hearing, Interim Transcript Relief, ADA/Section 504 Accommodations, and Preservation

transcripts or equivalent educational documentation. Because my TTUHSC records currently reflect a dismissal notation and the circumstances are public, this impairs my ability to secure such opportunities and constitutes ongoing, concrete harm. For example, in April 2024 I was *required to transmit an unofficial transcript that displayed a dismissal notation in an application process (Exhibits C-4 and C-5; and H-1/H-2/H-3)*. The need for immediate transcript relief (clean transcript/no re-imposition and corrective notices) is therefore continuing and non-speculative.

REQUEST

Please confirm by Tuesday, October 21, 2025, 5:00 p.m. Central Time (CT) that you will convene a name-clearing hearing within 14 days with these minimum features:

Neutral presider. Independent and not previously involved.

Seven-day advance notice of the specific statements and evidence to be addressed; the University's notice will identify each challenged statement verbatim, the speaker, date/time, audience/channel (e.g., class broadcast, listserv, media), and the documents the University will rely on.

Mutual, simultaneous exchange of exhibits and witness lists (with brief summaries) seven (7) days in advance; no undisclosed evidence absent good cause and presider approval.

Time parity and order. Equal total time for each side; scheduled breaks; no stacking many hours of adverse witnesses before my presentation; a neutral presider will manage turn-taking and questions (live questioning or written questions via the presider).

Complete record. Either the University provides audio or a court reporter; or I may retain a certified court reporter at my expense. Written findings issued within seven (7) days and suitable for public release with necessary redactions.

No retaliation for requesting or participating in the hearing.

Confidentiality and privacy. I agree to reasonable confidentiality protections for third-party PII/PHI and to redactions required by FERPA/health privacy. I will not agree to any restriction that prevents me from sharing my own statements, my redacted exhibits, the final written findings, or submitting the record to a court/regulator/law-enforcement. If broader confidentiality is needed, please propose a narrow protective order with those carve-outs. No NDA or release of claims will be required as a condition of receiving the hearing.

One-time extension (conditions; no tolling). If you need a brief extension, I can agree to a one-time extension of the response deadline to Friday, October 31, 2025 at 5:00 p.m. CT, only if by the current deadline (Tuesday, October 21, 2025) you confirm in writing: (i) the neutral presider (not previously involved); (ii) a hearing date to occur between November 4–11, 2025; (iii) mutual, simultaneous 7-day advance exchanges; (iv) time parity with scheduled breaks and no stacking; (v) a complete record (University audio or a court reporter, or I may retain a reporter at my expense); and (vi) the interim transcript relief below. This extension does not waive, toll, or extend any statute of limitations or other rights; I expressly reserve the right to file suit on or before Tuesday, November 4, 2025.

10/29/25, 1:26 PM

Gmail - Request for Name-Clearing Hearing, Interim Transcript Relief, ADA/Section 504 Accommodations, and Preservation

- (a) Transcript relief. Issue an official transcript without any disciplinary notation/hold and confirm in writing: no re-imposition absent lawful process; production of the audit log of notation history (codes; applied/removed dates); and the list of prior recipients of any transcript reflecting a notation/hold so that corrective transcripts or notices can be issued after the hearing if appropriate.
- (b) Dissemination pause. Refrain from any non-required dissemination of the stigmatizing statements to third parties (including students, donors, media, and external programs) until the hearing is complete and written findings are issued; provide advance notice of any legally required disclosure.
- (c) Recipient identification. Identify recipients who previously received any transcript containing a notation/hold, and (after the hearing) cooperate in issuing corrective notices where appropriate.

ADA / SECTION 504

[REDACTED] It recommended standard accommodations (e.g., equal time, scheduled breaks, written questions). (See Exhibit A: functional-limitations and recommendations excerpt.) The University already has the full evaluation.

Requested accommodations for the hearing: equal presentation time; scheduled breaks for 10 minutes every 30 minutes; neutral presider managing turn-taking; seven-day exhibit/witness exchange; ability to submit written questions; real-time captioning (CART) if needed; permission to consult notes; no stacking many hours of adverse witnesses before my presentation; and an option to participate remotely if required.

SDS parallel process. Any SDS intake or updated evaluation may proceed in parallel and will not delay the hearing.

PRESERVATION

Please take immediate steps to preserve all potentially relevant information, including: (i) Residency/GME broadcasts and listserv messages; (ii) Security/Police or Threat Assessment Team communications (including any BOLO, no-trespass, or campus-access restrictions); (iii) Rotation/site communications (including Covenant Health communications); (iv) Student Affairs mass broadcasts to classes, including the message titled "VACATION and other stuff" sent on 2024-01-07 at 7:46 a.m., its drafts and approvals, the distribution lists used, and any recall/replace logs or metadata; (v) Registrar transcript/notation audit logs and policies; and (vi) any communications to third parties (programs, hospitals, donors, media) that convey stigmatizing statements about me.

IDENTIFICATION (non-discovery; for planning)

- (1) Identify the official (name/title) who can schedule/order the hearing; (2) provide the transcript/notation history (codes; applied/removed dates); and (3) provide a list of recipients who previously received transcripts reflecting a notation/hold.

Please confirm receipt and provide a written response by Tuesday, October 21, 2025, 5:00 p.m. CT so that a hearing can be scheduled promptly. This request is made without waiving any rights, claims, or defenses. I remain willing to cooperate in good faith to finalize procedures and accommodations that ensure an effective opportunity to

10/29/25, 1:26 PM

Gmail - Request for Name-Clearing Hearing, Interim Transcript Relief, ADA/Section 504 Accommodations, and Preservation

Sincerely,
Kevin Bass
(redacted phone)

17 attachments

-  **Exhibit_A_Excerpt_Dx_Functional_Accommodations.txt**
2K
-  **Exhibit_B_Excerpt_Rules_Time_Scope.txt**
2K
-  **Exhibit_C-2_Transcript_2025-10-16.pdf**
400K
-  **Exhibit_C-3_Transcript_Email_Delivery_2025-10-16.pdf**
209K
-  **Exhibit_C-3_Transcript_Portal_Status_2025-10-16.pdf**
124K
-  **Exhibit_D-1_Americans_with_Disabilities_Act_Notice_Email_2023-12-08.pdf**
244K
-  **Exhibit_D-2_Hearing_Quotes.txt**
3K
-  **Exhibit_E_Student_Disability_Services_Policy.pdf**
238K
-  **Exhibit_E_Technical_Standards.pdf**
148K
-  **Exhibit_F_Crosswalk_Publication_Proof_FINAL_v3.csv**
6K
-  **Exhibit_G_Forbes_Email_VACATION_and_other_stuff_Combined_v2.pdf**
642K
-  **Exhibit_C-4_SOM_Transcript_Admin_Dismissal_2024-01-11.pdf**
135K
-  **Exhibit_C-5_GSBS_Transcript_Issued_2024-04-12.pdf**
441K
-  **Exhibit_H-1_SMUSOM_Admission_Requirements_Transcript_Requirement.pdf**
3932K
-  **Exhibit_H-2_SMUSOM_We_Can_Use_Unofficial_Transcripts_2024-04-11 - Copy.pdf**
249K
-  **Exhibit_H-3_SMUSOM_Email_Transcripts_Received_2024-04-12.pdf**
249K
-  **Exhibit_F_Crosswalk_CardFormat_v2.pdf**
47K

10/29/25, 1:26 PM

Gmail - Receipt confirmation — Name-Clearing Hearing Request (Oct 19, 2025)



Kevin Bass <kbassphiladelphia@gmail.com>

Receipt confirmation — Name-Clearing Hearing Request (Oct 19, 2025)

Kevin Bass <kbassphiladelphia@gmail.com>

Mon, Oct 20, 2025 at 8:00 AM

Reply-To: kbassphiladelphia@gmail.com

To: eric.bentley@ttu.edu, registrar@ttuhsc.edu, somosa@ttuhsc.edu

Bcc: disabilityservices@ttuhsc.edu

Hello,

Please confirm receipt of my Oct 19, 2025 Name-Clearing Hearing Request and identify the official who will schedule and manage the hearing procedure.

Kindly provide the next step and a timeline. I preserve all rights.

Thank you,

Kevin Bass PhD MS

Phone: [redacted phone]

10/29/25, 1:26 PM

Gmail - Receipt & Scheduling Contact — Name-Clearing Hearing (Kevin Bass)



Kevin Bass <kbassphiladelphia@gmail.com>

Receipt & Scheduling Contact — Name-Clearing Hearing (Kevin Bass)

Kevin Bass <kbassphiladelphia@gmail.com>

Mon, Oct 20, 2025 at 8:00 AM

Reply-To: kbassphiladelphia@gmail.com

To: registrar@ttuhsc.edu, disabilityservices@ttuhsc.edu, eric.bentley@ttu.edu, somosa@ttuhsc.edu, LubbockGME@ttuhsc.edu

Hello all. Please confirm receipt of my Oct 19 request and identify the official who can schedule the name-clearing hearing and finalize procedures (including ADA accommodations) by Tue, Oct 21, 2025, 5:00 p.m. CT. Thank you. Kevin

10/29/25, 1:27 PM

Gmail - Name-Clearing Hearing — 10/21/2025 deadline lapsed; schedule now



Kevin Bass <kbassphiladelphia@gmail.com>

Name-Clearing Hearing — 10/21/2025 deadline lapsed; schedule now

Kevin Bass <kbassphiladelphia@gmail.com>

Wed, Oct 22, 2025 at 8:00 AM

Reply-To: kbassphiladelphia@gmail.com

To: registrar@ttuhsc.edu

Cc: eric.bentley@ttu.edu, disabilityservices@ttuhsc.edu

Note: This follows my 10/21/2025 5:00 p.m. CT deadline, which passed without confirmation.

On Oct 19, 2025 I requested a name-clearing hearing and set a response deadline of Tue, Oct 21, 2025 at 5:00 p.m. CT to confirm you would convene the hearing within 14 days (by Nov 4, 2025). That deadline has passed without confirmation.

Please identify the scheduling official and provide a proposed date/time for the hearing by 12:00 p.m. CT on Wed, Oct 22, 2025. If you contend I do not qualify for a name-clearing hearing, please state the reasons and controlling authority in writing by that same time. The ADA/§504 interactive process I opened with SDS remains active. This notice is without waiver of rights.

Kevin Bass PhD MS

Phone: [redacted phone]

EXHIBIT W November 5, 2023 Meeting with Dr. Simon Williams (Transcript Excerpts) Bass v. Texas Tech University Health Sciences Center, et al., Civil Action No. 5:25-cv-00270-H (N.D. Tex. - Lubbock Division)

Source and format. These are selected verbatim excerpts from an approximately two-hour recorded meeting on or about November 5, 2023, between Plaintiff Kevin N. Bass ("Bass") and Dr. Simon Williams ("Williams"), Senior Associate Dean at TTUHSC School of Medicine (source audio file: Audio_11_05_2023_11_41_40).

The transcript refers to "Speaker A" (Williams) and "Speaker B" (Bass); for clarity, this Exhibit uses "Williams" and "Bass." Brackets and ellipses reflect only minor, non-substantive edits for readability. Time stamps in square brackets show the approximate position in the audio file. Citations in the briefing use the short form "Dean Meeting Tr. [timestamp] (Speaker)."

From Plaintiff's perspective, these excerpts are especially relevant to:

Count 4 (stigma-plus / name-clearing): alleged false "threat/dangerousness" narrative tied to an extreme status change and continuing publication.

Counts 5-6 (First Amendment and ADA/§ 504 retaliation): institutional reaction to Bass's Twitter speech and grievances; grievance + tweet → discipline pattern.

Count 3 (procedural due process): lack of pre-deprivation conversation, opaque professionalism process.

Counts 1-2 (ADA/§ 504 "direct threat" and effective-communication): admissions that Bass is not dangerous and statements about risk and process.

I. Williams States He Has Never Perceived Bass as a Threat or Danger

Transcript excerpt [01:48:59-01:49:19] - Bass and Williams

Bass: "Can I say Dr. Williams seems to believe that I'm not homicidal?"

Williams: "I... I have said that. I don't think you are. I don't think there's-- I've never sensed threat or danger or anything like that, but I think that that is not universal."

Relevance. A senior decision-maker expressly states that he has "never sensed threat or danger" from Bass, despite the emergency suspension, campus ban, and Criminal Trespass Warning. This supports falsity/exaggeration of the "dangerous student" narrative (Count 4) and undercuts any "direct threat" theory under ADA/§ 504 (Counts 1-2).

II. Tweet Characterized as Free Speech; Misinterpretation and Overreaction

Transcript excerpt [00:35:39-00:36:07] - Williams

"And you know, free speech is free speech. We've actually had [meetings] with the lawyers about [that]... when you're in a position that's such a trusted position in society."

Transcript excerpt [01:05:47-01:05:55] - Williams

"Why is it that that tweet, which is free speech, absolutely, but [the perceived risk] is just such an incredibly high level that this is the response?"

Transcript excerpt [00:53:15-00:53:32] - Williams and Bass

Williams: "I mean, I think all you can do [in the appeal] is say that your perception is: that was misinterpreted, that was not what you meant... People shouldn't overreact to your tweets."

Bass: "That's 100% the truth."

Transcript excerpt [00:30:41-00:31:00] - Bass

"This is not a threat and I don't think that would stand up as a threat... That's not a threat on Twitter."

Relevance. Williams repeatedly calls the tweet "free speech" and says it was "misinterpreted" and that "people shouldn't overreact" to Bass's tweets. Bass denies that the tweet was a threat. Together, these excerpts support the position that the tweet was protected speech, not a true threat, and that TTUHSC's response was an overreaction (Count 4; First Amendment and ADA/§ 504 retaliation, Counts 5-6).

III. Extreme and Rare Sanction: Suspension and Campus Ban

Transcript excerpt [00:03:22-00:03:36] - Williams

"So you tweeted a couple of days ago a tweet which said something like, 'We're all going to be [dead] very, very soon.'... That tweet itself created a huge amount of concern... That combined with, honestly, with everything else that's going on, raised the concern level to the level it is right now that the decision was made to suspend, put you on suspension and not allow you to come on campus."

Transcript excerpt [01:05:17-01:05:35] - Williams

"This is a pretty extreme response. I can only think of this happening once before in all the years I've been in the School of Medicine, and for a group of people to say, yeah, this person should not come on campus, that means there's a lot of high level of concern."

Relevance. Williams links the emergency suspension and campus ban directly to the contested tweet plus generalized "concern" and calls the response "pretty extreme," occurring only "once before" in his tenure. This shows an exceptional status change (suspension plus campus ban) attached to the threat label—supporting the "plus" element of stigma-plus (Count 4) and the irreparable-harm argument.

IV. Perception-Driven "Threat" Narrative in "Today's Environment"

Transcript excerpt [00:02:56; 00:03:14] - Williams

"It [the tweet]... created a huge amount of concern..."

"As you can imagine, in today's environment, people are very sensitive about that kind of [thing]."

Transcript excerpt [01:01:23-01:01:27] - Williams

"Lots of people expressed concern because they... shared it with each other... Multiple independent people saying, 'whoa, what's going on here?'"

Transcript excerpt [00:33:06] - Williams

"The danger of social media is no one knows the context, so everyone interprets it the way that they need to."

Relevance. Williams frames the situation as one of heightened sensitivity and subjective perception "in today's environment," not as a response to any concrete violent act. He notes that people shared the tweet and interpreted it without context. This supports the argument that the "threat" label is driven by others' interpretation, not by actual dangerous conduct (Count 4), and sets up the role of social-media overreaction in the retaliation narrative (Counts 5-6).

V. Retaliation Narrative: Grievances and Tweets Treated as "Threatening"

Transcript excerpt [00:49:03-00:49:15] - Williams

"Basically [the appeal record is] going to be that tweet and all the other documents that... for example, complaints that you have submitted against other people, which very quickly turn into a burgeoning sense of people feeling threatened."

Transcript excerpt [00:49:48] - Bass

"Whenever I make a grievance and then I make a tweet and then they're like, oh, that tweet's threatening me, therefore we're gonna, like, get him. I feel threatened also. I feel like they're again doing the same thing, like they're using the disciplinary process to try to, like, harass me... If I was going to be uncharitable, I could say, well, they're just, like, looking for that tweet. They found that tweet. They're like, yes, we've got it now. We can get Kevin out of the curriculum."

Transcript excerpt [00:50:13-00:51:23] - Bass and Williams

Bass: "If we want to talk about, like, interpreting other people negatively... there's different ways you can interpret that, [and it] really determines how we respond to what they're doing. I could say, if I was going to be uncharitable, I could say, well, they're just, like, looking for that tweet. They found that tweet. They're like, 'yes, we've got it now. We can get Kevin out of the curriculum.' And then... we can keep punishing him because we don't like him.

Or they have such a negative thought about me... They're not willing to be charitable towards me. They're just like, this guy, he's an asshole, he's, like, threatening people now. Like, of course, this is just typical for Kevin Bass..."

Williams: "I mean, I don't think anyone's doing that, but that's certainly an argument... All I can say is that I don't think that happens very often, but this is such an unusual situation. You... you... I mean, you are a personality. You've chosen to be that. And therefore—not that you have to take the

consequences, but the possibility that you are misinterpreted as you feel it or interpreted by someone else is going to be much [greater]."

Transcript excerpt [approx. 00:30:26-00:31:25] - Bass

"Other things on Twitter... my impression... when things were intense with me and Rachel, I saw Trotter... he had [my] Twitter [up]... I know that Twitter is not, apparently, off limits..."

Relevance. Williams confirms that Bass's complaints and grievances are part of the record and "very quickly" generate "a burgeoning sense of people feeling threatened," while Bass contemporaneously describes a pattern of protected grievances and speech leading to discipline. Williams acknowledges this is "certainly an argument" and explains that, because Bass has "chosen" to be a public "personality," the risk of being misinterpreted is much greater. These passages support the retaliation narrative (Counts 5-6) and reinforce that the "threat" story rests on misinterpretations of Bass's public persona and grievances, not genuine dangerousness (Count 4).

VI. Lack of Pre-Deprivation Conversation and Process Opacity

Transcript excerpt [01:10:13-01:11:29] - Bass and Williams

Bass: "Why didn't you guys talk to me about this before? Before doing this?"

Williams: "That's just not the way the process works. So I was in Seattle."

Bass: "Rachel said I physically threatened her once and then Trotter brought me in to talk to me about it. So why didn't we do that?"

Williams: "This was considered to be more severe."

Transcript excerpt [00:09:18-00:10:18] - Bass

"From my point of view... this process has not seemed very transparent to me at all, to a degree that is very unnerving to me. We have had the first SPPCC meeting. We did the appeal, it was overturned on the basis of no specific complaint. But then they still wanted to hold on to [other issues]... Then the question becomes, okay, so then what do they know? What is the issue? How do they see things? And I have no idea... Nobody ever communicated that to me... Everything was super unclear."

Transcript excerpt [00:29:05-00:29:07] - Bass

"The institution kept telling [me]... for that first letter that I got back from the first SPPCC, I remember [it saying I wasn't] a good role model on the team and stuff. I was like, what is this talking about?"

Relevance. Bass asks why no one spoke to him before imposing the suspension and campus ban. Williams's answers focus on "the process" and his travel ("I was in Seattle") and on the situation being "considered... more severe," rather than on any concrete imminent danger. Bass describes the professionalism process as opaque and confusing in real time. These excerpts support procedural-due-process (Count 3) and ADA effective-communication theories (Counts 1-2), and underscore the absence of any meaningful pre-deprivation or name-clearing opportunity (Count 4).

VII. Bass's Non-Threat Explanation of the Tweet (Mortality, Not Violence)

Transcript excerpt [01:09:24-01:10:09] - Bass and Williams

Bass: "Can I also explain what that tweet is about? Because it's really about that-- about leaving something behind. All this stuff, it's really about that."

Williams: "When I read it the first time... I was like, 'someday.' Okay, we're all going to die someday, really. But then it said 'very, very soon.'"

Bass: "We are going to die... I was being provocative in that way, but I wasn't trying to [threaten anyone]. The context is different."

Relevance. Bass offers a non-threat explanation for the tweet--mortality and legacy--and Williams acknowledges that it reads as "we're all going to die someday," with the "very, very soon" language being what unsettled others. This is precisely the alternative narrative Bass seeks to present in a name-clearing process (Count 4).

VIII. Anti-Violence Values and Long-Term Goals (No "Direct Threat")

Transcript excerpt [01:50:01-01:51:03] - Bass and Williams

Bass: "I feel like violence is something that desperate people do, you know, someone who feels like there is no hope. And that's not my situation... I would only hurt myself. I have big dreams, huge dreams. If I truly believe in those dreams, violence doesn't make any sense... Even if medicine was taken away from me, that'd be horrific... but I still have goals I'd fight for. I wouldn't give that away to just get some petty revenge right now."

Williams: "I mean, again, I have never felt that [you were going to be violent]."

Relevance. Bass explicitly disavows violence and anchors his reasoning in his "big dreams" and long-term goals. Williams reiterates that he has never felt Bass would be violent. This is powerful evidence against any claim that Bass posed a genuine safety threat (Counts 1-2) and supports falsity/exaggeration in the stigma-plus claim (Count 4).

IX. Educational and Professional Stakes; Willingness to Change Behavior

Transcript excerpt [00:05:33-00:07:27] - Bass

"You don't see that I want to be a doctor...?... Second thing is like I do want to be a doctor."

Transcript excerpt [00:34:13-00:34:34; 00:38:03; 00:53:32] - Bass

"I will treat my Twitter like I'm in the clinic, at least as far as controversial things... And I don't do that in the clinic ever. Again, if they ask me to mask in the clinic, I mask... I don't argue about it."

"No, I got you. And I think I've... gotten much better about that, actually. If you look at my Twitter..."

"No, they [people] shouldn't [overreact], but I also should do better. I agree... And there will not be this problem again."

Transcript excerpt [approx. 01:16:16-01:17:02] - Williams

"Your argument here should be... one, why is this not a high-risk situation; and number two, why you feel that you need to be able to demonstrate improved performance. And if you are unable to be in the clinic, in the clinical environment, you feel that basically it will prevent you from being able to do that."

Relevance. Bass emphasizes his desire to be a doctor, his willingness to comply with clinical rules, and his commitment to treat his Twitter like a clinical environment. Williams acknowledges that Bass needs clinical access to demonstrate "improved performance" and lower perceived risk. These statements support irreparable-harm arguments (loss of unique training opportunities), balance-of-equities and public-interest factors, and the feasibility of narrow, forward-looking injunctive relief (Counts 1-2, 4-6).

X. Williams's Acknowledgment of His Power and the Seriousness of the Action

Transcript excerpt [01:48:13] - Williams

"You're right. I am in a position of power."

Transcript excerpt [01:54:00] - Williams

"It's important for me that I do this. In fact, that's why I [came back from] Seattle a day early. Because I needed to be here today."

Transcript excerpt [01:54:16-01:54:21] - Williams

"I want you to know that because I never felt... [negative things about you]. I've always enjoyed my interactions with you... I wish other people could see it that way, but apparently that's [not the case]."

Relevance. Williams recognizes his institutional "position of power" over Bass and the seriousness of what was done (enough to change travel plans), while also affirming that he has "always enjoyed" interacting with Bass and does not share the fear attributed to "other people." This contrast between internal assessment and the public "dangerous student" narrative further supports falsity/exaggeration (Count 4) and the need for a formal name-clearing opportunity.

XI. Hearing Testimony: No Lockdown and "No Threat of Destruction"

Hearing transcript excerpt - Bass cross-examining Threat-Assessment Representative

Bass: "How many other times has the university been placed on lockdown based on a non-specific post like this which makes no threats against anyone?"

Threat-Assessment Representative: "[T]here was no university was not placed on lockdown..."

Bass: "What was the threat to destruction? What was the threat of destruction ... expressed in this [post]?"

Threat-Assessment Representative: "Post? None. Nothing."

Relevance. In the formal disciplinary hearing, the threat-assessment representative admits under questioning that (1) the university was not placed on lockdown in response to Bass's tweet and (2) when asked "what was the threat to destruction" expressed in the post, he answers "Post? None. Nothing." This undercuts any claim that the tweet posed an actual "threat of destruction" or met a "direct threat" standard, and supports Bass's argument that TTUHSC overreacted to protected speech rather than a genuine threat (Counts 2 and 4, and indirectly 5-6).

XII. Hearing Testimony: Prior Case Was Secret; Bass's Case "Escalated into Public Domain"

Hearing transcript excerpt - Threat-Assessment Representative comparing cases

Threat-Assessment Representative: "...[In a prior case] it actually turned out in the student's favor. And no one knew. Even within the student body, nobody [knew]."

Threat-Assessment Representative: "In this particular instance ... it was not handled privately... instead it was escalated into public domain."

Relevance. TTUHSC's own threat-assessment witness concedes that in another serious student case, the matter "turned out in the student's favor" and "no one knew... even within the student body, nobody" knew about it. By contrast, in Bass's case, he admits it "was not handled privately" and was "escalated into public domain." This is direct evidence of publication and institutional stigma: TTUHSC chose to handle Bass's alleged "threat" differently from comparable matters, allowing it to become widely known among students. That goes straight to Count 4 (stigma-plus / name-clearing) and to the existence of ongoing reputational harm, not merely past injury.

XIII. Hearing Testimony (Dr. Erwin): Disability Context and Non-Threat Interpretation of the Tweet

Hearing transcript excerpt - Dr. Erwin (professionalism coach) testifying about Bass

Erwin: "[V]ery, very soon can mean 70 years in the big scheme of things..."

Erwin: "You're talking on a very philosophical level... You got very philosophical on everything."

Erwin: "I completely understand how that language that you have in that tweet would strike other people as very, very concerning."

Relevance. A TTUHSC professionalism coach who worked closely with Dr. Bass told the hearing panel that his communication style is "very philosophical," that he "got very philosophical on everything," and that she did not interpret his tweet as a threat from him, even though she understood how the language might strike others as "very, very [concerning]." This testimony:

Reinforces that the tweet was understood by someone who knew Dr. Bass as philosophical rhetoric, not as a concrete threat;

Frames the conflict as a problem of others' perception of his language, rather than any intent by Dr. Bass to threaten; and

Supports Dr. Bass's position that TTUHSC's "threat" narrative reflects a misinterpretation of his speech, rather than an objective finding of dangerousness.