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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

KEVIN N. BASS, §
§
Plaintiff, §
§
v. § Civil Action No. 5:25-cv-00244-H
§

TEXAS TECH UNIVERSITY §
HEALTH SCIENCES CENTER; §
AMANDA McSWEEN, in her individual §
and official capacities as University §
Registrar; §
LAUREN COBBS, M.D., M.Ed., FACP, §
in her individual and official capacities §
as Senior Associate Dean for Student §
Affairs (SOM); §
SIMON WILLIAMS, Ph.D., in his §
individual and official capacities as §
Senior Associate Dean for Academic §
Affairs (SOM); §
TAMARA MANCINI, M.Ed., in her §
official capacity as Director of Student §
Disability Services; §

MIA MYERS, in her official capacity as §

Associate Managing Director, Student §

Financial Aid; §

JOHN/JANE DOE, in his/her official §

capacity as TTUHSC ADA Title II §

Coordinator; §

LORI RICE-SPEARMAN, Ph.D., in her §

official capacity as President, Texas §

Tech University Health Sciences Center; §

DARRIN D'AGOSTINO, D.O., MPH, MBA, §

in his official capacity as Executive §

Vice President and Provost / Chief §

Academic Officer, Texas Tech University §

Health Sciences Center; §

DARREN G. GIBSON, in his individual §

capacity; §

JENNIFER WILSON, M.D., in her §

individual capacity; §

RACHEL FORBES, MBA, BS, in her §

individual capacity; and §

DOES 2–10, in their individual §

capacities, §

§

Defendants. §

FIRST AMENDED COMPLAINT

(Amended as a Matter of Course under Fed. R. Civ. P. 15(a)(1))

VERIFIED COMPLAINT FOR DAMAGES,

DECLARATORY (28 U.S.C. §§ 2201–02), AND INJUNCTIVE RELIEF

Use of Generative Artificial Intelligence

Plaintiff used generative artificial intelligence to assist in drafting this brief. Plaintiff has reviewed the brief and is responsible for its content.

INTRODUCTION

1. This civil action challenges Defendants' disability-based denial of meaningful access to a high-stakes student disciplinary hearing; selective departures from written procedures; publication of stigmatizing accusations tied to a status-changing transcript notation; and retaliation for protected speech and disability-rights activity.

2. Plaintiff seeks: (a) damages and declaratory relief under § 504 of the Rehabilitation Act against TTUHSC as a federal funds recipient; (b) prospective relief under Title II of the ADA against appropriate officials pursuant to *Ex parte Young*, 209 U.S. 123 (1908); and (c) damages and declaratory relief under 42 U.S.C. § 1983 against individual capacity officials for violations of the First and Fourteenth Amendments.

JURISDICTION, VENUE, AND AUTHORITY FOR RELIEF

3. This Court has federal question jurisdiction under 28 U.S.C. §§ 1331 and 1343.

4. Venue is proper in this District and Division under 28 U.S.C. § 1391(b)(1)–(2) because a substantial part of the events or omissions giving rise to the claims occurred here and at least one defendant resides or is found here.

5. Declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201–02 and Fed. R. Civ. P. 57 and 65. Costs are authorized by 28 U.S.C. § 1920; and, if counsel appears, reasonable attorney's fees from counsel's appearance forward are authorized by 42 U.S.C. §§ 1988 and 12205 and 29 U.S.C. § 794a(b). Post judgment interest is authorized by 28 U.S.C. § 1961.

SOVEREIGN IMMUNITY, REMEDIAL FRAMEWORK, AND EXHAUSTION

6. Plaintiff does not seek § 1983 money damages against TTUHSC or against officials in their official capacities. See *Will v. Michigan Dep't of State Police*, 491 U.S. 58, 71 (1989).

7. TTUHSC's receipt of federal funds waives Eleventh Amendment immunity for § 504 claims. 42 U.S.C. § 2000d7; *Pace v. Bogalusa City Sch. Bd.*, 403 F.3d 272, 280–89 (5th Cir.

2005) (en banc). TTUHSC is an arm of the State of Texas and therefore a Title II “public entity,” 42 U.S.C. § 12131(1)(B), and a § 504 “program or activity,” 29 U.S.C. § 794(b)(2)(A).

8. Plaintiff seeks prospective, nonmonetary relief under Title II against appropriate officials with a sufficient enforcement connection under *Ex parte Young*. See *Verizon Md., Inc. v. Pub. Serv. Comm’n of Md.*, 535 U.S. 635, 645–46 (2002).

9. Consistent with *Cummings v. Premier Rehab Keller, P.L.L.C.*, 142 S. Ct. 1562 (2022), and *Barnes v. Gorman*, 536 U.S. 181 (2002), Plaintiff does not seek punitive or emotional distress damages under ADA/§ 504. He seeks economic losses and, where permitted, nominal damages. Punitive damages are sought, if at all, only on § 1983 claims against individual capacity defendants where allowed by law.

10. No administrative exhaustion is required for the Title II or § 504 claims pleaded here.

STATUTE OF LIMITATIONS AND TIMELINESS

11. The events at issue occurred primarily between December 2023 and January 2024, with continuing effects thereafter.

12. Texas’s two-year personal injury limitations period applies to § 1983, Title II, and § 504 claims. See *Frame v. City of Arlington*, 657 F.3d 215, 237–38 (5th Cir. 2011) (en banc); *Piotrowski v. City of Houston*, 237 F.3d 567, 576 (5th Cir. 2001). This action is timely.

PARTIES

13. Plaintiff Kevin N. Bass is a qualified individual with disabilities within the meaning of § 504 and Title II.

14. Defendant Texas Tech University Health Sciences Center (“TTUHSC”) is a public entity that receives federal financial assistance and is an arm of the State of Texas. It is therefore a Title II “public entity,” 42 U.S.C. § 12131(1)(B), and a § 504 “program or activity,” 29 U.S.C. § 794(b)(2)(A). Federal funds proof includes TTUHSC’s Title IV participation (Federal School Code 016024), annual Single Audit reporting, and Texas Comptroller records showing federal expenditures for agency 739.

15. Defendant Amanda McSween is TTUHSC’s University Registrar. She is sued in her individual capacity (damages under § 1983) and in her official capacity (prospective Title II relief).

16. Defendant Lauren Cobbs, M.D., M.Ed., FACP, is Senior Associate Dean for Student Affairs (School of Medicine). She is sued in her individual capacity (damages under § 1983) and in her official capacity (prospective Title II relief).

17. Defendant Simon Williams, Ph.D., is Senior Associate Dean for Academic Affairs (School of Medicine). He is sued in his individual capacity (damages under § 1983) and in his official capacity (prospective Title II relief).

18. Defendant Tamara Mancini, M.Ed., is Director of Student Disability Services. She is sued in her official capacity (prospective Title II relief).

19. Defendant Mia Myers is Associate Managing Director, Student Financial Aid. She is sued in her official capacity (prospective Title II relief related to status reporting/holds interfaces).

20. Defendant John/Jane Doe is TTUHSC's ADA Title II Coordinator (identity presently unknown). He/she is sued in official capacity to implement injunctive relief.

20A. Defendant Lori Rice-Spearman, Ph.D., is the President of TTUHSC. She is sued in her official capacity as an Ex parte Young defendant for purposes of implementing prospective Title II relief. As President, she has overall executive responsibility for TTUHSC's academic programs, student disciplinary processes, and compliance policies, and is empowered to direct subordinate officials in implementing court-ordered changes to transcript-notation practices, student-discipline procedures, and campus-access and CTW/ban communications.

20B. Defendant Darrin D'Agostino, D.O., MPH, MBA, is TTUHSC's Executive Vice President and Provost / Chief Academic Officer. He is sued in his official capacity as an Ex parte Young defendant for purposes of implementing prospective Title II relief. As Provost and Chief Academic Officer, he oversees TTUHSC's academic affairs—including the School of Medicine's disciplinary framework and the Student Affairs, Registrar, Student Disability Services, and Financial Aid units that control transcript and status notations and accommodation implementation.

21. Defendant Darren G. Gibson is an attorney who served as the outside Hearing Officer for Plaintiff's December 11, 2023 disciplinary hearing. TTUHSC retained Gibson to preside over the hearing after the Student Conduct Board Chair delegated procedural authority to him. While performing that delegated adjudicatory function, Gibson acted under color of state law. He is sued in his individual capacity.

21A. Plaintiff sues Gibson in his individual capacity under 42 U.S.C. § 1983 for the due-process and retaliation violations described in Counts 3 and 5.

21B. Defendant Jennifer Wilson, M.D., is Vice Dean for Medical Education at TTUHSC's School of Medicine Covenant Branch Campus and an Associate Professor in the Department of Pediatrics. She is sued in her individual capacity (damages under 42 U.S.C. § 1983). At all relevant times, she acted under color of state law as an official of a public medical school.

21C. Defendant Rachel Forbes, MBA, BS, is Assistant Vice Dean for Student Affairs for the Covenant Branch Campus at TTUHSC's School of Medicine and serves as a Senior Career Advisor. She is sued in her individual capacity (damages under 42 U.S.C. § 1983). At all relevant times, she acted under color of state law as an official of a public medical school.

22. Defendants DOES 2–10 are presently unidentified TTUHSC officials who participated in the events alleged below. They are sued in their individual capacities.

DEFENDANTS (IDENTIFICATION & ROLES FOR RELIEF)

23. For clarity regarding implementation of prospective relief, the institutional roles implicated include:

- TTUHSC — entity defendant for § 504 (federal funds recipient).
- AMANDA McSWEEN — University Registrar: transcript issuance/notations/holds.
- LAUREN COBBS, M.D., M.Ed., FACP — Senior Associate Dean for Student Affairs (SOM): student discipline logistics, hearing administration.
- SIMON WILLIAMS, Ph.D. — Senior Associate Dean for Academic Affairs (SOM): emergency removal/academic affairs process triggers.
- TAMARA MANCINI, M.Ed. — Director, Student Disability Services: ADA effective communication/modifications execution.
- MIA MYERS — Associate Managing Director, Student Financial Aid: Title IV (R2T4)/enrollment status reporting and holds workflows.
- ADA TITLE II COORDINATOR — 28 C.F.R. § 35.107 coordination of Title II compliance and central implementation of injunctive relief.

FEDERAL–STATE COORDINATION / NONINTERFERENCE

24. Plaintiff maintains a separate, exhibit free state action seeking only a prompt, public name-clearing/FERPA amendment hearing and neutral annotation; no damages are sought there. The federal claims here (§ 504/Title II/§ 1983) seek distinct remedies and do not require this Court to enjoin or review any state court order. No relief requested here would interfere with any state proceeding or order, and abstention is unwarranted.

FACTUAL ALLEGATIONS

A. Disability notice and requested accommodations

25. Before a December 11, 2023 disciplinary hearing, Plaintiff provided written notice of a [REDACTED] disability [REDACTED], lodged accommodation requests through Student Disability Services (“SDS”), and supplied a neuropsychological evaluation recommending communication supports, including limited attorney-assisted questioning to cue/clarify. On December 8, 2023, Plaintiff and counsel called SDS to initiate accommodations under TTUHSC HSC OP 77.14, which recognizes a Letter of Accommodation (LOA) as the university-approved mechanism and provides that, once an LOA is issued, no further proof should be required and classroom accommodations should be implemented within one week (five business days).

26. Officials acknowledged the SDS process on the record. The Hearing Officer admitted only a redacted evaluation—excluding the accommodations section as “outside the Board’s scope”—and categorically barred counsel from questioning witnesses directly even as a communication aid. This contravened OP 77.14’s effective communication framework and Plaintiff’s documented functional limitations (processing speed/executive function under sustained adversarial sessions; need for orderly turn-taking; benefit from written copies; predictable breaks).

B. Hearing structure and departures from written rules

27. The hearing lasted roughly fourteen hours and involved ten witnesses plus Plaintiff. Published hearing materials set 10-minute openings, 30 minutes per witness per side, and confirmed recording protocols; yet the presider barred contemporaneous objections; required counsel’s questions to be submitted in writing; asserted unilateral authority to limit Plaintiff’s questioning for “relevance”; and applied time limits and sequencing asymmetrically against Plaintiff, contrary to the published rules promising equal time limits, Board questions first, and no objections.

27A. In a recorded November 2023 meeting, Student Conduct Administrator Dr. David Trotter told Plaintiff that any consolidated hearing would be “broken into sections” in a way that maximized Plaintiff’s protection: first, the Board would hear and decide Plaintiff’s grievances and mistreatment complaints against faculty and administrators; only after those decisions were made would the Board move to the conduct complaints and negative evaluations. Dr. Trotter stated that hearing the grievances first “would provide [Plaintiff] the most protection” and that it “wouldn’t make sense” to hear “the conduct stuff” first and only later consider the mistreatment concerns. Plaintiff prepared for the December 11, 2023 hearing in reliance on this promised format, but as described in ¶¶27 and ¶42, TTUHSC instead stacked hours of adverse testimony and conduct allegations before allowing any meaningful opportunity for Plaintiff to present his grievances or a coherent response.

27B. In the same November 2023 conversations, Dr. Trotter told Plaintiff that TTUHSC was willing to resolve all pending matters only if Plaintiff withdrew from the School of Medicine with no possibility of re-enrollment and that, absent such a withdrawal, “they want this to move to a hearing.” Plaintiff declined to withdraw and proceeded to prepare for the December 11, 2023 hearing in reliance on the grievance-first structure described in ¶27A. Plaintiff alleges that this withdrawal ultimatum, coupled with the later abandonment of the promised format, underscores the coercive and pretextual nature of the process.

28. On information and belief, TTUHSC retained an outside Hearing Officer for Plaintiff’s proceeding who lacked neutrality and operated under constraints that materially favored the administration, including restricting Plaintiff’s questioning and applying time limits asymmetrically, contrary to published procedures.

C. Evidence gating and record access

29. Defendants consolidated matters without consent; denied requested separate hearings; restricted defense witnesses; accepted late/redacted evidence favorable to the administration while excluding comparable defense evidence.

30. TTUHSC controlled the recording, which contained apparent discontinuities. Access to the "official" record was delayed and limited to in-person audio review. Plaintiff seeks native audio/video files with hashes, access logs, and chain of custody.

D. "Direct threat" framing without individualized assessment

31. The Hearing Officer invoked ADA "direct threat" concepts but did not conduct an individualized assessment grounded in current medical knowledge or best available objective evidence, nor did he/she consider whether reasonable modifications could mitigate any risk. See 28 C.F.R. § 35.139(b); *Bragdon v. Abbott*, 524 U.S. 624, 649–50 (1998); *EEOC v. Exxon Corp.*, 203 F.3d 871, 873–74 (5th Cir. 2000).

31A. Plaintiff's November 3, 2023 social-media post—the catalyst for the Emergency Removal and Criminal Trespass Warning—was a short philosophical reflection on mortality that did not name TTUHSC, identify any person, or call for or threaten violence. TTUHSC's Threat Assessment and Interim Suspension paperwork nonetheless characterized the post as a "threatening" or "potential threat," recounted that some faculty and staff reported "concern for personal safety," and invoked Code provisions on "physical harm or threat of harm," while at the same time identifying no weapon, plan, target, or prior violent conduct and checking "No" in response to prompts about criminal charges such as weapons or terroristic threats.

31B. TTUHSC's own conduct is inconsistent with any genuine belief that Plaintiff posed an imminent safety risk: throughout the same period, administrators continued to meet with him in ordinary settings; Plaintiff attended the December 11, 2023 hearing without any search of his person or belongings or visible special security measures; and the Emergency Removal and Criminal Trespass Warning quietly expired without any requirement that Plaintiff demonstrate he was "no longer a threat" or comply with remedial conditions. Plaintiff alleges that, considered together with the lack of an individualized, evidence-based risk assessment, these facts support an inference that "direct threat" labels were invoked as a disciplinary framing rather than as a good-faith application of ADA standards.

31C. TTUHSC's own written findings repeatedly describe Plaintiff's tweet only in terms of how some community members "perceived" it—using qualifiers such as "perceived threat," "potential threat," and "may fear for ... safety"—rather than as an actual threat or expression of intent to harm anyone. The Student Conduct Board expressly characterized the tweet as "disruptive and reasonably perceived as a potential threat to members of the TTUHSC community," and in the Interim Suspension/Threat Assessment Questionnaire officials again marked that there were no criminal weapons, assault, or terroristic-threat charges. In light of the tweet's philosophical content and the absence of any identified plan, weapon, or target, Plaintiff alleges that treating it as a Code-of-Conduct "threat of harm" was

unreasonable and, when combined with the Emergency Removal, CTW, and publications described below, materially stigmatizing.

E. Protected speech and retaliation context

32. Plaintiff publicly criticized COVID19 policies and filed grievances—speech and petitioning on matters of public concern.

33. Within a week of administrators urging him to stop posting online, professionalism charges were issued; an interim removal/trespass notice referenced his speech “context”; and witnesses reported being coached. Class-wide messaging on January 7, 2024 explicitly told recipients to “check his Twitter,” underscoring retaliatory animus and selective enforcement.

33A. Plaintiff maintains a public social-media presence where he comments on scientific, medical, and social issues. His commentary has, at times, drawn intense online backlash, including hostile messages and public calls for TTUHSC, which peaked during this period, to discipline or remove him from the medical school. Plaintiff alleges that TTUHSC officials were aware of this backlash and reputational pressure, monitored his social-media activity, and discussed the controversy surrounding his posts, and that these concerns contributed to their decision to characterize his November 3, 2023 post as a “threat” and to invoke emergency-removal and disciplinary procedures, rather than treating it as protected commentary.

F. Publication and ongoing harm

34. Before the hearing, administrators issued a campus-wide “BOLO” message. After the hearing, administrators circulated a January 7, 2024 class-wide broadcast stating that the class was “one student lighter” and directing recipients to “check his Twitter,” followed by a recall request. TTUHSC later placed an “Administrative Dismissal Effective 01-11-2024” notation on Plaintiff’s transcript. Plaintiff suffered significant educational, economic, and reputational harm. Evidence includes (i) a January 1, 2024 public post stating “we did it, Kevin Bass’ medical committee voted to expel him,” (ii) the class-wide broadcast and recall, and (iii) BOLO/ban echoes such as “not letting this student onto campus,” attributed to agency communications.

34A. On or about October 16, 2025, TTUHSC issued an official transcript bearing the “Administrative Dismissal Effective 01-11-2024” notation described in ¶34. Third-party recipients reported adverse decisions after receiving transcripts with that notation, and ongoing transcript issuance constitutes continued publication by the agency.

34B. Plaintiff further alleges that TTUHSC has selectively emphasized certain entries in his education record that portray him in a negative light, including a disputed pediatrics clerkship evaluation and threat-assessment materials, while omitting or downplaying more favorable evaluations and other contextual information. Plaintiff is informed and believes that this selective presentation has contributed to a stigmatizing narrative about him in the

medical community, including public commentary by many physicians suggesting that Plaintiff had been the subject of sexual harassment complaints and had made threats of violence before being expelled from medical school. Plaintiff denies that this narrative accurately reflects his conduct or the underlying events and alleges that it flows directly from the challenged cluster of education record entries maintained and disseminated by TTUHSC.

34C. Plaintiff further alleges that the stigmatizing narrative described in ¶34B has been echoed and amplified in online harassment, where he has received hostile messages invoking themes of dangerousness, “threats,” or sexual-misconduct rumors tied to his dismissal. He contends that this amplification illustrates the ongoing reputational impact of the challenged transcript notation and related education-record entries and underscores the need for a corrective, name-clearing process.

G. Exclusion and campus access restrictions (status change)

35. TTUHSC issued an Emergency Removal and campus ban—stating Plaintiff was not allowed on HSC property during the investigation—and a Criminal Trespass Warning that required police coordination even to access his child’s school on TTU property. These restrictions coincided with the stigmatizing publications described above.

35A. On November 4, 2023, the Assistant Vice Dean for Student Affairs emailed more than thirty recipients—including Covenant Branch campus and affiliated hospital gatekeepers—stating: “do not allow Kevin Bass into the Covenant Branch office nor badge him in at any of the hospitals,” pending “further notice.” On information and belief, several recipients were non-TTUHSC clinical-affiliate personnel, reflecting an agency directive that barred access before any adjudication under TTUHSC’s own student-discipline procedures and circulated beyond the University.

H. Individual defendants’ personal participation (non-exhaustive)

36. Lauren Cobbs: Oversaw the student discipline process and the selection/instructions of the Hearing Officer; denied or ratified denials of separate hearings and evaluator testimony; enforced or ratified procedures that limited Plaintiff’s ability to be heard; urged Plaintiff to curtail protected online speech; and participated in derogatory public communications about Plaintiff.

36A. Jennifer Wilson: Plaintiff alleges that Vice Dean Jennifer Wilson, without discussion or an attempt at remediation, filed multiple professionalism complaints against him that mischaracterized his words and conduct; that he filed grievances against her; that she was a primary advocate for imposing a Criminal Trespass Warning and campus ban by asserting she was afraid of Plaintiff and providing extensive testimony in support of that sanction; and that, after the CTW issued and while grievances were pending, she failed Plaintiff on his pediatrics clerkship without a clear academic basis, in retaliation for his protected speech and petitioning activity.

36B. Rachel Forbes: Plaintiff alleges that Assistant Vice Dean for Student Affairs Rachel Forbes urged Plaintiff to curtail protected online speech; authored and sent the November 4, 2023 email to Covenant Branch campus and affiliate-hospital gatekeepers stating that they should not permit Plaintiff into the Covenant Branch office or badge him in at any hospital pending further notice; that she authored and sent the January 7, 2024 class-wide broadcast stating that the class was "one student lighter" and directing classmates to check Plaintiff's Twitter for further updates, followed by a recall attempt; that she disseminated or coordinated BOLO and ban communications; and that she on several occasions filed or prompted physical threat and professionalism complaints against Plaintiff in response to his speech and grievances.

37. Simon Williams: Initiated or ratified interim removal measures; invoked "direct threat" framing without individualized assessment; approved consolidation; urged Plaintiff to curtail protected online speech; and enforced or ratified procedures that limited Plaintiff's ability to be heard.

37A. Plaintiff further alleges that all six formal grievances he filed against faculty and staff for learner mistreatment were reviewed and rejected by four different administrators—Drs. Simon Williams, Thomas Tenner, J. Edward Bates, and Allan Haynes—each of whom concluded that there was "no evidence" of misconduct or that his grievances themselves violated policy. Plaintiff contends that this 0-for-6 outcome, coupled with Williams's dual role in both grievance review and Emergency Removal decisions, is probative of institutional bias and retaliatory motive rather than neutral evaluation of his complaints.

38. Amanda McSween: Published and/or caused to be published the transcript notation "Administrative Dismissal Effective 01112024"; communicated or caused the communication of the status to third parties; and maintained transcript holds/notations despite Plaintiff's objections and pending review. Evidence of third party reliance includes denials of opportunities upon receipt of transcripts bearing the notation

39. Darren G. Gibson: As outside Hearing Officer, Gibson presided over the disciplinary hearing; barred real-time objections; organized the hearing in a manner contrary with the Student Handbook; filtered or refused Plaintiff's questions; cut Plaintiff's questioning short while permitting extensive administrative questioning; and admitted administrative evidence while excluding comparable defense evidence, all contrary to published procedures and despite notice of Plaintiff's communication-related disabilities.

39A. On information and belief, the materials and charges presented to Gibson—including the Emergency Removal and Criminal Trespass Warning referencing the "context" of Plaintiff's social-media posts, the professionalism charges that issued within days of administrators urging Plaintiff to stop posting online, and Plaintiffs filed grievances against faculty and administrators—made plain that Plaintiff's public commentary and petitioning activity were central to the case. Knowing that the proceeding was, in substantial part, a response to Plaintiff's protected speech and grievances, Gibson used his delegated procedural authority in a manner that selectively constrained Plaintiff's ability to defend

and contextualize that speech while allowing TTUHSC broad latitude to present and rely on it, thereby furthering the retaliatory campaign described in ¶¶ 32–33.

40. Tamara Mancini (official capacity): Received Plaintiff's SDS notice and requests; failed to give primary consideration to Plaintiff's requested auxiliary aids; and did not implement reasonable modifications to ensure effective communication at the hearing under OP 77.14's LOA and implementation benchmarks.

41. Mia Myers (official capacity): Maintains Title IV/enrollment status reporting and related holds; has operational control over processes implicated by transcript notations and status communications and is a necessary official capacity implementer of prospective relief. Following the status change, TTUHSC cancelled \$3,524.00 in aid, revoked \$20,118.11 in scholarship, and posted a \$24,316.56 balance—all flowing from the stigmatizing dismissal status and notation.

I. Dismissal determination and scope

42. TTUHSC's Board letter states the hearing lasted approximately 14 hours and that the Board "reviewed ... additional documentation ... including a medical assessment," yet the accommodations content was excluded as "outside the Board's scope," denying a meaningful chance for disability-appropriate presentation.

42A. The Student Conduct Board that unanimously recommended Plaintiff's non-academic dismissal was chaired by Associate Dean of Admissions Dr. Felix Morales and included four additional voting members—two faculty physicians and two fourth-year medical students—while TTUHSC delegated day-of-hearing procedural authority to outside attorney Darren G. Gibson of Littler Mendelson P.C. Plaintiff alleges that Gibson, acting under color of state law, selectively allowed late-added administration witnesses (including Drs. Vo, Thomas, and Erwin) while denying Plaintiff's requested witnesses such as his neuropsychological evaluator, Dr. Andrew Wierchowski, and Student Conduct Administrator Dr. David Trotter, and that these structural and evidentiary choices, layered on top of the ADA-related communication barriers described above, materially increased the risk of erroneous deprivation.

J. Publication logs, recipients, and continuing effects

43. Plaintiff has compiled publication logs and will seek metadata/listserv expansion logs and meeting artifacts (calendars, Zoom/Teams recordings) to identify recipients and authenticate channels (email, LMS/Canvas, Teams/Slack, GroupMe/WhatsApp, and other studentfacing platforms). These materials support both the publication element of "stigmatplus" and the need for targeted, publicationonly expedited discovery.

K. Ongoing violations; basis for prospective relief and expedited preservation

44. Plaintiff faces ongoing harm from current policies and practices governing transcript notations and status communications, access to and preservation of hearing records, and

rules that will govern any renewed adjudication or credentialing communications. Targeted preservation and Rule 26(d) expedited discovery (publication only) are warranted to capture message headers, listserv logs, audit trails, and collaboration platform exports and to enable corrective notices after judgment.

CLAIMS FOR RELIEF

(Each Count incorporates ¶¶ 1–44 by reference.)

COUNT 1 — Rehabilitation Act § 504 (Damages & Declaratory Relief) — Against TTUHSC

45. Section 504 prohibits disability discrimination in any “program or activity” receiving federal financial assistance. 29 U.S.C. § 794(a), (b)(2)(A). Elements: (1) disability; (2) otherwise qualified; (3) exclusion from participation in, denial of benefits of, or discrimination under a federally funded program; and (4) exclusion by reason of disability (and, to the extent § 504 is construed to require it, solely by reason of disability, as construed in the Fifth Circuit). See *DelanoPyle v. Victoria Cnty.*, 302 F.3d 567, 574 (5th Cir. 2002).

46. Monetary relief requires intentional discrimination, satisfied at least by deliberate indifference to known, necessary accommodations. See *BennettNelson v. La. Bd. of Regents*, 431 F.3d 448, 454–55 (5th Cir. 2005); *Cadena v. El Paso Cnty.*, 946 F.3d 717, 724–27 (2020); *Windham v. Harris Cnty.*, 875 F.3d 229, 235–37 (2017).

47. TTUHSC—through officials with authority to provide accommodations and to rectify denials, including SDS Director Mancini and Senior Associate Deans Cobbs and Williams, and through the Hearing Officer—had actual knowledge of Plaintiff’s disability-related communication needs yet (a) excluded the accommodations section of his evaluation; (b) barred attorneyassisted questioning as a communication aid; (c) applied time limits and filters asymmetrically; and (d) refused modest schedule/format modifications—denying meaningful access to the adjudication. See 28 C.F.R. § 35.160(a)(2) (effective communication); § 35.139 (direct threat). This deliberate indifference proximately caused economic losses including Title IV balance due, lost scholarship funds, lost stipends, exam and application fees, and delays in credentialing.

48. Plaintiff seeks economic damages proximately caused by the violations and, where permitted, nominal damages. No punitive or emotional distress damages are sought under § 504.

COUNT 2 — ADA Title II (Prospective Relief) — Against Official-Capacity Defendants (ADA Coordinator; Registrar McSween; Senior Associate Deans Cobbs and Williams; SDS Director Mancini; Financial-Aid Official Myers; President Rice-Spearman; Provost/EVPAA D’Agostino)

49. This claim arises under 42 U.S.C. § 12132 and is enforceable through 42 U.S.C. § 12133. Title II obligates public entities to make reasonable modifications in policies, practices, or

procedures when necessary to avoid discrimination, unless doing so would fundamentally alter the service. 28 C.F.R. § 35.130(b)(7)(i).

50. Title II also requires effective communication and obligates the entity to give primary consideration to the individual's requested auxiliary aids. 28 C.F.R. § 35.160(a)(2). Primary consideration means honoring the individual's chosen auxiliary aid unless an equally effective alternative is available or provision would cause a fundamental alteration or undue financial/administrative burden. Where "direct threat" is asserted, the entity must conduct an individualized assessment based on current medical knowledge or best available objective evidence and consider whether reasonable modifications can mitigate risk. 28 C.F.R. § 35.139(b); *Bragdon v. Abbott*, 524 U.S. 624, 649–50 (1998); *EEOC v. Exxon Corp.*, 203 F.3d 871, 873–74 (5th Cir. 2000).

51. Defendants failed to provide reasonable modifications and effective-communication measures necessary for Plaintiff's participation (e.g., limited attorney-assisted questioning as a communication aid; equitable time allocations keyed to documented limitations; admission of evaluator testimony; timely disclosure; and record-access protocols). As summarized in ¶23, each named official has a sufficient enforcement connection for *Ex parte* Young relief: the Registrar controls transcript notations and issuance/holds; the Senior Associate Deans oversee hearing administration and emergency-removal processes; the SDS Director implements ADA accommodations across proceedings; the Financial-Aid official controls status reporting and holds interfacing with Title IV systems; and the ADA Coordinator orchestrates Title II compliance, 28 C.F.R. § 35.107. For complete prospective relief, the President (appointment of a hearing official/committee) and Provost/EVPAA (hearing scheduling and FERPA-amendment processing) possess direct enforcement connections under TTUHSC student-records policy and have therefore been added in their official capacities as *Ex parte* Young defendants.

52. Plaintiff seeks a narrowly tailored injunction requiring compliance with §§ 35.130(b)(7)(i), 35.160, and 35.139(b) in any ongoing or future proceedings, including: (a) designation of the ADA Coordinator as a centralized point of contact to implement accommodations across Student Affairs/Registrar/Academic Affairs; (b) preservation and access to native audio/video files and associated hashes, access logs, and chain-of-custody records; (c) FERPA-aligned protections; (d) procedures ensuring that transcript notations and status communications are generated, maintained, and communicated in a manner consistent with Title II going forward; and (e) if TTUHSC conducts any renewed adjudication concerning the events alleged herein, it must do so under an ADA-compliant framework that includes equal time allocation, reasonable auxiliary aids, disclosure timelines, and access to a complete, continuous record. See *Tennessee v. Lane*, 541 U.S. 509, 531–34 (2004); *United States v. Georgia*, 546 U.S. 151, 159 (2006).

52A. The injunction should also require primary consideration for Plaintiff's requested auxiliary aids—including limited attorney-assisted questioning as a communication aid, predictable breaks, CART/closed captioning, and written copies of verbal information—consistent with OP 77.14 and 28 C.F.R. § 35.160.

52B. TTUHSC's own Student Education Records policy (HSC OP 77.13), related privacy notices, and Student Handbook already recognize students' rights to seek amendment or annotation of education records believed to be inaccurate, misleading, or maintained in violation of privacy rights, and describe a process in which the Provost (or designee) arranges a hearing, the President (or designee) appoints an impartial hearing official or committee, and, if no change is ordered, the student's written statement must be maintained with, and disclosed with, the contested portion in all future disclosures. Plaintiff alleges that Defendants Rice-Spearman and D'Agostino have not performed these ministerial duties in his case despite his written requests, and that the prospective relief requested here would simply require them to implement TTUHSC's existing correction/annotation framework in a manner consistent with Title II and the Due Process Clause.

COUNT 3 — Procedural Due Process (Fourteenth Amendment) via 42 U.S.C. § 1983 (Damages & Declaratory Relief) — Against Cobbs, Williams, Gibson, and DOES 2-10 (individual capacities)

53. At all relevant times, Defendants Cobbs, Williams, Gibson, and DOES 2-10 acted under color of state law as officials of a public university. Students facing serious disciplinary sanctions are entitled to notice and a meaningful opportunity to be heard, evaluated under *Mathews v. Eldridge*'s balancing. See *Dixon v. Alabama State Bd. of Educ.*, 294 F.2d 150, 157-59 (5th Cir. 1961); *Mathews v. Eldridge*, 424 U.S. 319, 334-35 (1976); *Goss v. Lopez*, 419 U.S. 565 (1975). This case concerns disciplinary, not academic, sanctions. Cf. *Bd. of Curators v. Horowitz*, 435 U.S. 78 (1978).

54. Plaintiff alleges both (i) a liberty interest in his good name, reputation, and honor, the deprivation of which was accompanied by a change of legal status (loss of student status and a transcript notation), and (ii) to the extent recognized under Texas law and TTUHSC policies, a statecreated property interest in continued enrollment. See *Hughes v. City of Garland*, 204 F.3d 223, 226-28 (5th Cir. 2000); *Bledsoe v. City of Horn Lake*, 449 F.3d 650, 653-55 (5th Cir. 2006). The liberty interest and *Mathews* risk-of-error theories are primary.

55. Plaintiff does not claim a categorical right to attorney-led cross examination. See *Plummer v. Univ. of Houston*, 860 F.3d 767 (5th Cir. 2017); *Van Overdam v. Texas A&M Univ.*, 43 F.4th 522 (5th Cir. 2022). Rather, Plaintiff challenges selective departures from written rules and communication-related restrictions that, given his disabilities, denied a meaningful opportunity to be heard and materially increased the risk of erroneous deprivation at minimal administrative cost. Cf. *Walsh v. Hodge*, 975 F.3d 475, 484-85 (5th Cir. 2020).

56. Defendants amplified the risk of error by (i) prohibiting contemporaneous objections; (ii) categorically barring counsel's limited questioning as an auxiliary communication aid; (iii) imposing asymmetric time limits and surprise witnesses; (iv) favoring administrative

evidence while gating defense evidence; and (v) restricting and delaying access to a complete, continuous record.

57. Clearly Established Law / Qualified Immunity. At the time, it was clearly established that public universities imposing serious disciplinary sanctions must provide notice and a meaningful opportunity to be heard under *Dixon* and *Mathews*, and officials may not employ arbitrary hearing restrictions that materially increase the risk of erroneous deprivation at minimal administrative cost. On the facts alleged, Defendants are not entitled to qualified immunity at the pleading stage.

COUNT 4 — “StigmaPlus” (Fourteenth Amendment Liberty Interest) via 42 U.S.C. § 1983 (Damages & Declaratory Relief) — Against McSween, Forbes, and DOES who published stigmatizing statements (individual capacities)

58. At all relevant times, Defendants McSween, Forbes, and DOES 2–10 who published or caused publication of the statements at issue acted under color of state law as officials of a public university. Reputation alone is not a protected interest, but a claim lies where the government publishes materially false, stigmatizing facts in connection with an alteration of legal status. *Paul v. Davis*, 424 U.S. 693 (1976); *Codd v. Velger*, 429 U.S. 624 (1977); *Hughes*, 204 F.3d at 226–28; *Bledsoe*, 449 F.3d at 653–55.

59. As described in ¶¶34, 34A, and 35–35A, Defendants (i) sent a January 7, 2024 class-wide broadcast stating that the class was “one student lighter than last week” and directing recipients to “check his Twitter,” followed by a recall attempt; (ii) placed an “Administrative Dismissal Effective 01-11-2024” notation on Plaintiff’s official transcript that third parties used to deny opportunities; and (iii) disseminated campus-wide and affiliate-hospital BOLO/ban and exclusion directives suggesting Plaintiff was dangerous. These publications coincided with the loss of student status and conveyed dangerousness and unfitness. The statements and insinuations were materially false and stigmatizing, and Plaintiff alleges falsity and causation, satisfying stigma-plus elements. Evidence includes the publication logs and header captures described in ¶34 and ¶43, as well as reports of third-party reliance in ¶34A.

59A. In particular, as alleged in ¶35A and ¶36B, Defendant Forbes authored the November 4, 2023 exclusion email instructing Covenant Branch campus and affiliate-hospital gatekeepers not to permit Plaintiff into the Covenant Branch office or badge him into any hospital pending further notice, extending the stigmatizing “threat” narrative to non-TTUHSC clinical-affiliate personnel.

60. Plaintiff requested a name-clearing hearing on October 19, 2025 and demanded confirmation by October 21, 2025, with a hearing within 14 days; Defendants failed to provide the hearing. Post-publication hearings are proper in the Fifth Circuit. See *Wells v. Hico Indep. Sch. Dist.*, 736 F.2d 243 (5th Cir. 1984); *In re Selcraig*, 705 F.2d 789 (5th Cir. 1983); *White v. Thomas*, 660 F.2d 680 (5th Cir. 1981). Plaintiff seeks declaratory relief and damages.

60A. The prior December 11, 2023 consolidated disciplinary hearing did not supply the required name-clearing process. It was not noticed or structured as a dedicated name-clearing proceeding; disability-related evidence, including the accommodations section of Plaintiff's neuropsychological evaluation and testimony from his evaluator, was treated as outside the Board's scope; attorney advisors were barred from directly questioning witnesses even as a communication aid; and deliberations occurred off the record. Plaintiff therefore had no meaningful opportunity in that earlier setting to create an on-the-record account responding to the stigmatizing "threat" and professionalism narratives that TTUHSC continues to disseminate.

60B. Clearly Established Law / Qualified Immunity. At the time of the events alleged, it was clearly established that government officials may not publish materially false, stigmatizing accusations in connection with an alteration of legal status without providing a meaningful name-clearing hearing. See *Paul v. Davis*, 424 U.S. 693 (1976); *Codd v. Velger*, 429 U.S. 624 (1977); *Hughes v. City of Garland*, 204 F.3d 223, 226–28 (2000); *Bledsoe v. City of Horn Lake*, 449 F.3d 650, 653–55 (2006). On the facts alleged, Defendants are not entitled to qualified immunity at the pleading stage.

COUNT 5 — First Amendment Retaliation via 42 U.S.C. § 1983 (Damages, Declaratory & Limited Injunctive Relief) — Against Cobbs, Williams, Gibson, Wilson, Forbes, and DOES 2–10 (individual capacities)

61. At all relevant times, Defendants Cobbs, Williams, Gibson, Wilson, Forbes, and DOES 2–10 acted under color of state law as officials of a public university. Plaintiff must show (1) protected speech; (2) an adverse action that would deter a person of ordinary firmness; and (3) that his speech was a substantial or motivating factor. See *Keenan v. Tejada*, 290 F.3d 252, 258 (5th Cir. 2002); *Mt. Healthy City Sch. Dist. Bd. of Educ. v. Doyle*, 429 U.S. 274, 287 (1977).

62. As alleged in ¶¶32–33 and 36A–36B, Plaintiff criticized public-health policy and filed grievances; administrators urged him to stop posting; professionalism charges issued within days; the interim-removal and trespass notice cited the "context" of his online speech; and Wilson and Forbes helped drive CTW/campus-ban measures, exclusion directives to affiliates, a failing pediatrics clerkship grade, and class-wide messaging ("check his Twitter"). Temporal proximity, contemporaneous references to his posts, selective departures from rules, and the retaliatory intent alleged in ¶¶36A–36B together plausibly show causation.

62A. As further detailed in ¶39A, Hearing Officer Gibson was put on notice that the disciplinary charges and interim-removal measures were tied to the "context" of Plaintiff's online speech and grievances; he then used his delegated authority to impose one-sided time limits, restrict and filter Plaintiff's questioning, and gate defense evidence in the very proceeding convened to adjudicate those speech-linked accusations. These selective restrictions—imposed while permitting expansive presentation of TTUHSC's narrative—would deter a person of ordinary firmness from continuing to criticize the institution

publicly or pursue grievances and were substantially motivated by Plaintiff's past and ongoing protected speech and petitioning activity.

63. Plaintiff seeks damages and a narrow anti-retaliation injunction barring adverse action for engaging in protected speech about this dispute, litigating this case, or filing/granting public records requests—without restricting neutrally applied, lawful rules.

63A. Plaintiff intends to continue speaking publicly on the matters at issue and to request records and accommodations, and he faces a credible threat of further retaliatory adverse actions absent prospective injunctive relief.

64. Clearly Established Law / Qualified Immunity. It was clearly established that officials may not take adverse action in retaliation for a student's protected speech on matters of public concern, and that Mt. Healthy burdenshifting applies. On the facts alleged, Defendants are not entitled to qualified immunity at the pleading stage.

COUNT 6 — ADA Title II and § 504 Retaliation/Interference (Damages under § 504; Prospective Relief under Title II) — Against TTUHSC (damages) and OfficialCapacity Defendants (prospective relief)

65. The ADA and its regulations prohibit retaliation and interference against individuals who request accommodations or oppose disability discrimination. 42 U.S.C. § 12203; 28 C.F.R. § 35.134. The Title VI remedies incorporated by § 504 authorize damages against a federal funds recipient; prospective relief is available against officials under *Ex parte Young*.

66. After Plaintiff notified SDS of his diagnoses and requested communication supports, Defendants escalated adverse actions—including interim removal, selective rule enforcement, gating of the accommodations content, and status-affecting transcript notations—actions that would deter a reasonable person from engaging in ADA/§ 504 activity and are causally connected to Plaintiff's protected requests.

67. Plaintiff seeks (a) damages against TTUHSC for economic losses proximately caused by retaliation; and (b) prospective injunctive relief under Count 2 to prevent further retaliation or interference and to require Title II compliant processes going forward.

IMMEDIATE NEED FOR INTERIM RELIEF (Rule 65)

68. Plaintiff seeks a narrowly tailored preliminary injunction to prevent irreparable injury pending judgment. The Canal Authority factors favor relief: (1) a substantial likelihood of success on Count 4 (agency publication, request/denial of name-clearing hearing, transcript notation) and Counts 1–2 (effective communication failures under OP 77.14 and Title II/§ 504); (2) irreparable injury to professional reputation and training trajectory through continuing publication and transcript notation; (3) the balance of equities favors preventing further dissemination and ensuring a corrective process; and (4) the public interest favors compliance with the Constitution and the ADA. See *Canal Authority of the State of Florida v.*

Callaway, 489 F.2d 567, 572–73 (5th Cir. 1974). Where the current status quo itself inflicts irreparable harm, courts may alter it to prevent injury.

69. Plaintiff requests the Court's straightforward Ex parte Young inquiry for prospective relief against appropriate officials, limited to halting ongoing violations and setting a prompt, ADA-compliant name-clearing process. See *Verizon Md., Inc.*, 535 U.S. at 645–46. Plaintiff is prepared to post a nominal bond in any amount the Court deems appropriate under Rule 65(c).

69A. Pending judgment, the Court should (i) order the Registrar to annotate any issued transcript with "Disputed; correction/annotation process pending," and after the ordered name-clearing process, to append the corrective hearing record (or, if no change is ordered, Plaintiff's statement) to future disclosures; and (ii) enjoin new or continued dissemination of outbound CTW/ban/exclusion directives to affiliates, except as required by law, while the name-clearing process proceeds.

PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court enter judgment in his favor and:

A. Declare that Defendants violated Plaintiff's rights under § 504, Title II, the First Amendment, and the Fourteenth Amendment;

B. Award compensatory damages under § 504 (economic/educational losses—e.g., Title IV balance of \$24,316.56, lost scholarship \$20,118.11, returned aid \$3,524.00, fees/stipends, and other provable economic losses—and, where permitted, nominal damages) against TTUHSC; and award damages (and, where appropriate, punitive damages) under § 1983 against individual capacity defendants; no punitive or emotional distress damages are sought under ADA/§ 504;

C. Issue a narrow anti-retaliation injunction barring adverse action for (i) litigating this case, (ii) pursuing public records requests, (iii) requesting or using ADA/§ 504 accommodations, or (iv) engaging in protected speech about this dispute, while preserving neutrally applied, lawful rules;

D. Enter prospective Title II relief (pursuant to *Ex parte Young*, 209 U.S. 123 (1908), against officials with a sufficient enforcement connection) requiring compliance with 28 C.F.R. §§ 35.130(b)(7)(i), 35.160, and 35.139(b) in any ongoing or future proceedings; designate TTUHSC's ADA Coordinator (28 C.F.R. § 35.107) as the point of contact to implement accommodations across Student Affairs/Registrar/Academic Affairs with timelines and reporting; and require primary consideration for requested auxiliary aids consistent with OP 77.14's LOA framework and five-business-day implementation benchmarks;

E. Order Defendants to schedule and conduct a post-publication name-clearing hearing for Plaintiff within 14 days of the Court's order, with reasonable accommodations as required by Title II and § 504 and with a written decision issued promptly thereafter;

F. Order preservation (not collection at this time) of native hearing/recording files (audio/video), associated hashes, access logs, and chain of custody records under a FERPA-aligned protective order; and extend preservation to publications related ESI (classwide broadcasts; listserv/LMS/Teams/Slack posts; social media-linked communications; calendars/Zoom/Teams meeting artifacts; metadataonly CSVs showing MessageID/from/to/cc/bcc/subject/thread IDs), including suspension of autodeletion and documentation of systems searched. Plaintiff will file any request for expedited discovery as a separate motion with a supporting brief consistent with the Local Rules. Such preservation and any subsequent productions shall be subject to Fed. R. Civ. P. 5.2 and a FERPA-aligned protective order;

G. Order interim annotation/issuance of a corrected transcript pending the name-clearing hearing (nonstigmatizing, statusneutral — e.g., “Disputed; correction/annotation process pending”), identify prior transcript recipients, and, upon final judgment for Plaintiff on Count 4 and/or ADA/§ 504 claims, expunge or amend the “Administrative Dismissal Effective 01112024” notation and require TTUHSC to notify, at its expense, all third parties to whom the notation or stigmatizing statements were disseminated during the limitations period that the notation has been removed or corrected.

H. Prospectively order that, if TTUHSC conducts any renewed disciplinary adjudication concerning the events at issue, it must do so under an ADA-compliant framework (effective communication and reasonable modification measures), with equal time allocation keyed to functional limitations, fair disclosure timelines, and access to a complete, continuous, native record;

I. Award taxable costs as permitted by 28 U.S.C. § 1920 and, if counsel appears, reasonable attorney’s fees from counsel’s appearance forward under 42 U.S.C. §§ 1988 and 12205 and 29 U.S.C. § 794a(b);

J. Award prejudgment interest as allowed by law and postjudgment interest under 28 U.S.C. § 1961; and

K. Grant all further relief the Court deems just and proper, including nominal damages where compensatory damages may be unavailable. See *Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 802 (2021).

L. Pending judgment, enjoin dissemination to third party clinical affiliates of CTW/ban/exclusion directives concerning Plaintiff, except as required by law; require any necessary safety communications to be neutral and nonstigmatizing while the name-clearing process proceeds.

COMPLIANCE NOTE

Filed with a completed Civil Cover Sheet (JS44) and Certificate of Interested Persons per N.D. Tex. LR 3.1/3.2.

SERVICE NOTE

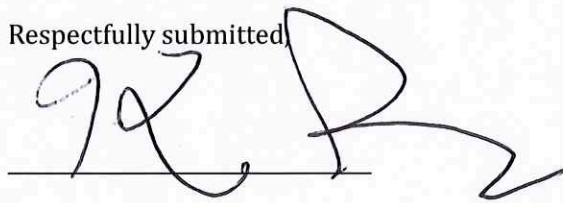
Service on TTUHSC must comply with Fed. R. Civ. P. 4(j)(2) (or, via Rule 4(e)(1), any state law method), and service on individuals must comply with Rule 4(e). If Plaintiff elects service pursuant to state law under Rule 4(e)(1) and 4(j)(2), he will effect service on the Texas Attorney General and on the agency as required.

JURY DEMAND

Plaintiff demands a jury on all issues so triable.

DATED: December 11, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kevin N. Bass', is written over a horizontal line.

Kevin N. Bass

A solid black rectangular redaction box covering a line of text, likely an address.A solid black rectangular redaction box covering a line of text, likely an address.

Phone: 512-333-4092

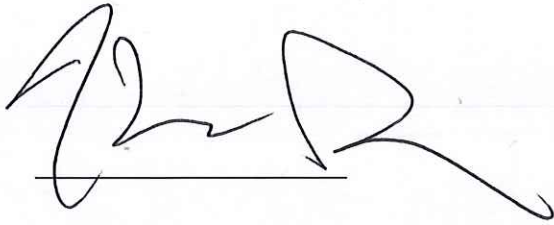
Email: kbassphiladelphia@gmail.com

Pro Se Plaintiff

VERIFICATION (28 U.S.C. § 1746)

I, Kevin N. Bass, declare under penalty of perjury that the foregoing is true and correct based on my personal knowledge, except as to matters stated on information and belief, and as to those I believe them to be true.

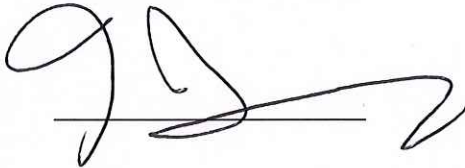
Executed on December 11, 2025.

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CERTIFICATE OF SERVICE

I certify that, as of the date of filing this First Amended Complaint, no defendant has appeared in this action and no additional service under Fed. R. Civ. P. 5 is required at this time. Plaintiff will serve the summons and First Amended Complaint under Fed. R. Civ. P. 4.

Dated: December 11, 2025

A handwritten signature in black ink, consisting of a large, stylized 'G' followed by a horizontal line and a long, sweeping flourish.