

EXHIBIT 2



November 16, 2023

Kevin Bass, Ph.D.
Kevin.bass@ttuhsc.edu

Dr. Ebtesam Islam, M.D., Ph.D.
Ebtesam.islam@ttuhsc.edu

RE: **HEARING NOTICE**
School of Medicine Student Conduct Board
Accused Student: Kevin Bass
Complainant: Dr. Ebtesam Islam

Dear Dr. Bass and Dr. Islam:

As Chair of this Student Conduct Board, and in accordance with Part II., Code of Professional Conduct (Student Code), I, along with the other Student Conduct Board Members listed below, are charged with hearing the Complaints filed against, and by, Dr. Bass in accordance with the Consolidated Hearing Process. It is also my duty to inform you of the following as required in Part II.F.4.b., Hearing Notice:

1. Date, time and place for the hearing
 - i. December 11, 2023
 - ii. 8:00 a.m.
 - iii. TTU System Building, Regent's Committee Room #106
2. Names of the Student Conduct Board members hearing your case:
 - Dr. Felix Morales - Chair
 - Dr. Patti Patterson
 - Dr. Jennifer Mitchell
 - Ms. Michelle Onuoha
 - Mr. Joseph Silvaggio
3. Copy of the complaints are attached.

Both Dr. Bass and Dr. Islam may challenge, in writing, the impartiality of any member of the Student Conduct Board (SOM Student Conduct Board) up to **three (3) business day** after receiving this Hearing Notice by submitting their reasons for the challenge to the Student Conduct Administrator, Dr. David Trotter. The challenging party shall with specificity, and clarity, detail each reason for such challenge.

The burden of proving the impartiality or inability of a Student Conduct Board member to serve lies solely upon the challenging party. If the challenging party establishes that the challenged members cannot serve with fairness and objectivity, such member shall be removed and a substitute will be appointed by the Student Conduct Administrator. If such member is removed, the Student Conduct Administrator may choose to reschedule the meeting (Part II.F.4c.).

Please let me know if you have any questions regarding this hearing process.

Sincerely,

A handwritten signature in blue ink that reads "Felix Morales, MD". The signature is written in a cursive, flowing style.

Felix G. Morales, M.D.
Associate Dean of Admissions
Professor of Family & Community Medicine

COMPLAINTS

1. 8/1/2023: Complaint filed by Dr. Elisabeth Conser, as a Title IX Mandatory Reporter, based upon information provided to her by [REDACTED]

➤ **Part II. D.5.c.;**

“Behavior that disrupts the normal operation of the University, including, but not limited to, a member of the University community; or conduct that otherwise interferes with or creates a hostile or intimidating environment for a member of the University community’s academic pursuits or work environment. Such conduct does not necessarily have to be in violation of the law to violate this section.

➤ **Part II.D.18.a.:**

“Violation of any published University policies, rules, or regulations that govern student or student organization behavior, including, but not limited to, applicable publications for each TTUHSC School, such as student handbooks, catalogs, professional and ethical standards, and course syllabus.”

More specifically, SOM OP 40.03 Student Conduct Policy, Medical Student Honor Code, in part:

“I will enter into professional relationships with my colleagues, teachers, and other health care professionals in a manner that is respectful and reflective of the high standards and expectations of my profession.

2. 9/18/2023: General Misconduct Complaint filed by Dr. Jennifer Wilson,

➤ **Part II.D.18.a.:**

“Violation of any published University policies, rules, or regulations that govern student or student organization behavior, including, but not limited to, applicable publications for each TTUHSC School, such as student handbooks, catalogs, professional and ethical standards, and course syllabus.”

More specifically, SOM OP 40.03 Student Conduct Policy, Medical Student Honor Code, in part:

“I will enter into professional relationships with my colleagues, teachers, and other health care professionals in a manner that is respectful and reflective of the high standards and expectations of my profession.

3. 9/29/2023: General Misconduct filed by Dr. Jennifer Wilson,

➤ **Part II.18.a.:**

“Violation of any published University policies, rules, or regulations that govern student or student organization behavior, including, but not limited to, applicable publications for each TTUHSC School, such as student handbooks, catalogs, professional and ethical standards, and course syllabus.”

More specifically, SOM OP 40.03 Student Conduct Policy, Medical Student Honor Code, in part:

“I will enter into professional relationships with my colleagues, teachers, and other health care professionals in a manner that is respectful and reflective of the high standards and expectations of my profession.

4. 11/3/2023: “X” post reported to SOM Administration,

➤ **Part II.D.5.a.:**

“Physical harm or threat of harm to any person.”

➤ **Part II.D.5.c.:**

“Behavior that disrupts the normal operation of the University, including, but not limited to, a member of the University community; or conduct that otherwise interferes with or creates a hostile or intimidating environment for a member of the University community’s academic pursuits or work environment. Such conduct does not necessarily have to be in violation of the law to violate this section.

➤ **Part II.18.a.:**

“Violation of any published University policies, rules, or regulations that govern student or student organization behavior, including, but not limited to, applicable publications for each TTUHSC School, such as student handbooks, catalogs, professional and ethical standards, and course syllabus.”

More specifically, SOM OP 40.03 Student Conduct Policy, Medical Student Honor Code, in part:

“I will enter into professional relationships with my colleagues, teachers, and other health care professionals in a manner that is respectful and reflective of the high standards and expectations of my profession.

School of Medicine Operating Policy 40.04
Student Promotions and Professional Conduct Committee (SPPCC)

Referrals to the SPPCC due to receiving “Below Expectations” in Professionalism for the following Clerkships:

- | | | |
|---------------|--------------------|------------|
| 1. Psychiatry | Below Expectations | 08/01/2023 |
| 2. Pediatrics | Below Expectations | 09/18/2023 |
| 3. Pediatrics | Below Expectations | 09/22/2023 |
| 4. Pediatrics | Below Expectations | 09/22/2023 |
| 5. Pediatrics | Below Expectations | 10/27/2023 |

Withheld: third-party complaint

Withheld: third-party complaint

Withheld: third-party complaint

Withheld: third-party complaint

COMPLAINT #2

**Texas Tech University Health Sciences Center - Student Services
General Misconduct/Grievance Report**

Submitted on September 18, 2023 at 2:38:02 pm CDT

Nature **Misconduct**
Urgency **School of Medicine**
Incident Date and Time **2023-09-07 10:45 AM**
Incident Location **Online**

Reported by

Name: **Jennifer Wilson**
Title: **Assistant Professor of Pediatrics and Covenant Pediatric Clerkship Director**
Email: **jennifer.e.wilson@ttuhsc.edu**
Phone: **806-782-6480**
Address:

[Authenticated as Wilson, Jennifer E]

Involved Parties

Kevin Bass () kevin.bass@ttuhsc.edu
Alleged

Jennifer Wilson () jennifer.e.wilson@ttuhsc.edu
Victim

Rachel Forbes () rachel.forbes@ttuhsc.edu
Victim

Shaughn Nunez () shaughn.m.nunez@ttuhsc.edu
Victim

Letha McGraw () letha.Mcgraw@ttuhsc.edu
Victim

Questions

CODE OF STUDENT / PROFESSIONAL MISCONDUCT (Select all that apply)

Violation of Published University Policies, Rules, or Regulations, Other, Unsure

GENERAL GRIEVANCE (Select all that apply)

OTHER (If other was selected in sections above please describe)

TTUHSC Medical Student

Please provide a detailed description of the incident/concern using specific concise, objective language (i.e. who, what, where, when, why, and how).

On 9/7/2023, Kevin Bass sent an email as a reply to Rachel Forbes pertaining to absences during his pediatric rotation. Kevin missed two days in a row in addition to Labor Day holiday in 1 week. The dates missed were 9/4, 9/6 and 9/7. Rachel was inquiring about the absences and makeup since the student did not notify myself as the pediatric clerkship director or Rachel. In his email reply to Rachel, myself, Shaughn Nunez and Letha McGraw he attached pictures of vomit and diarrhea to help justify his multiple sick days. To not notify his clerkship director of the sick days and then to include pictures such as those at his level of education is extremely unprofessional. I will attach the email below but will spare anyone having to see the images. I can provide them upon request.

What remedy are you seeking for your complaint (e.g., reduction of grade for particular work and/or class, warning, probation, suspension, dismissal, restitution, etc.)?

Probation, suspension or dismissal

Attachments

reabsenceswilsonjennifere.pdf

Pending IR #00000488

Submitted from 170.173.78.35. No routing rule matched. Routed to default recipient (Erin Justyna, Associate Provost for Student Affairs).

Withheld: patient-related report

Withheld: patient-related report

Withheld: patient-related report

COMPLAINT #4



Kevin Bass PhD MS
@kevinnbass

Subscribe

Each and every one of us is going to be dead someday very, very soon.

Given this, why most people put so much stock into what other people think about them is completely beyond me.

These other people, too, are going to be dead very, very soon.

8:49 AM · 03 Nov 23 · 5,377 Views



13 Reposts 1 Quote 110 Likes 2 Bookmarks



Eric Estes  @ExtropianEric · 10h

Replying to [@kevinnbass](#)

I only care what my family thinks of me. I love those peeps.



89



A&Z MD  @AZMD1 · 10h

Replying to [@kevinnbass](#)

This platform helps us get used to

