

2019 Louisiana High School Mock Trial Competition Case

Blake Carver

VS.

Theta Lambda Pi Fraternity,
Inc.

A CIVIL CASE BY THE UNIVERSITY OF LOUISIANA-MONROE MOCK TRIAL TEAM
JORDEN JOHNSON ISIAH CHAVIS

Synopsis

Reagan Carver was an 18-year-old freshman at Southwestern State University in Bogalusa, Louisiana. During Reagan's freshman semester in the fall of 2017, Reagan began the initiation process into the Zeta Mu Chapter of Theta Lambda Pi Fraternity, Inc., a co-ed fraternity on campus. During the initiation process, Reagan was allegedly hazed and died on October 31, 2017. Reagan's parent Blake is now suing Theta Lambda Pi for the wrongful death of their child.

Available Witnesses

Plaintiff

- Robin Winter, Officer of Wildlife and Fisheries
- Alex Hampton, former Pledge of Theta Lambda Pi
- Dr. Sam Richards, Psychologist

Defense

- Taylor Parker, current President of the Zeta Mu Chapter of Theta Lambda Pi
- Dr. J.D. Cheatham, Psychiatrist
- Blair Doolittle, current member of the Zeta Mu Chapter of Theta Lambda Pi

Exhibit List

1. Map of Alligator Farm
2. Pledge Report
3. Wildlife and Fisheries report
4. Reagan Carver's Personality Test Results

CIRCUIT COURT OF LOUISIANA

Blake Carver,

Case No. 17- 623

Plaintiff,

Action filed: February 19, 2018

V.

Theta Lambda Pi, Inc.,

Judge Oliver Bridges

Defendant.

Complaint

1. This is a wrongful death action brought under the Louisiana Civil Code Section 2315.2.

JURISDICTION, VENUE, & ADMINISTRATIVE PREREQUISITES

2. This court has subject matter jurisdiction, personal jurisdiction, and is a proper venue for this lawsuit.

3. Plaintiff has complied with all legal requirements to bring this action in a court of proper jurisdiction.

PARTIES AND RELEVANT INDIVIDUALS

4. Plaintiff Blake Carver is a citizen of Louisiana and is the sole surviving parent of Reagan Carver ("Carver").

5. Defendant Theta Lambda Pi, Inc. ("Defendant") is the first co-ed fraternity in Louisiana. It was chartered on the campus of Southwestern State University in 1985. The Zeta Mu Chapter at Southwestern is currently the only active chapter in the state.

6. Since January 1, 2015, Taylor Parker ("Parker") has been the president of the defendant's Zeta Mu Chapter.

PETITION FOR DAMAGES FOR WRONGFUL DEATH

The petition of Blake Carver, hereinafter “Petitioner”, a major resident of Alexandria, Louisiana, individually and on behalf of the deceased, Reagan Carver, respectfully represents:

1. On September 5, 2017, Carver began the initiation process into the defendant’s Zeta Mu Chapter.
2. On October 31, 2017, Carver participated in a hazing event led by Parker at the defendant’s fraternity house on the campus of Southwestern State University and later at the Bogalusa Alligator farm.
3. The hazing event required Carver to consume 375 milliliters of tequila before attempting to catch a hatchling at Bogalusa Alligator Farm.
4. After consuming the above alcohol, Carver was viciously attacked by an adult alligator while attempting to complete the hazing ritual and was pronounced dead an hour after all efforts to resuscitate Carver failed.
5. At the time Carver was attacked, Carver was fulfilling all the requirements to gain admittance into the defendant’s Zeta Mu Chapter.
6. The sole cause of Carver’s death was the negligent conduct of the defendant in violation of Louisiana Civil Code article 2315 and 2315.2.

PRAYER FOR RELIEF

WHEREFORE, Petitioner demands judgment against Defendant and compensatory damages for the wrongful death, mental anguish, emotional distress, and loss of enjoyment of life in the amount of \$5,000,000.

Respectfully submitted,

M. Cooper

Cooper, Dennis, Jackson & Associates
Attorneys for the Plaintiff

CIRCUIT COURT OF LOUISIANA

Blake Carver,

Case No. 17- 623

Plaintiff,

Action filed: February 19, 2018

V.

Theta Lambda Pi, Inc.,

Judge Oliver Bridges

Defendant.

Answer

1. This is a wrongful death action brought under the Louisiana Civil Code Section 2315.2.

Defendant's Response: Admitted

JURISDICTION, VENUE, & ADMINISTRATIVE PREREQUISITES

2. This court has subject matter jurisdiction, personal jurisdiction, and is a proper venue for this lawsuit.

Defendant's Response: Admitted

3. Plaintiff has complied with all legal requirements to bring this action in a court of proper jurisdiction.

Defendant's Response: Admitted

PARTIES AND RELEVANT INDIVIDUALS

4. Plaintiff Blake Carver is a citizen of Louisiana and is the sole surviving parent of Reagan Carver ("Carver").

Defendant's Response: Admitted

5. Defendant Theta Lambda Pi, Inc. ("Defendant") is the first co-ed fraternity in Louisiana. It was chartered on the campus of Southwestern State University in 1985. The Zeta Mu Chapter at Southwestern is currently the only active chapter in the state.

Defendant's Response: Admitted

6. Since January 1, 2015, Taylor Parker ("Parker") has been the president of the defendant's Zeta Mu Chapter.

Defendant's Response: Admitted

PETITION FOR DAMAGES FOR WRONGFUL DEATH

The petition of Blake Carver, hereinafter “Petitioner”, a major resident of Alexandria, Louisiana, individually and on behalf of the deceased, Reagan Carver, respectfully represents:

1. On September 5, 2017, Carver began the initiation process into the defendant’s Zeta Mu Chapter.

Defendant’s Response: Denied.

2. On October 31, 2017, Carver participated in a hazing event led by Parker at the defendant’s fraternity house on the campus of Southwestern State University and later at the Bogalusa Alligator farm.

Defendant’s Response: Denied.

3. The hazing event required Carver to consume 375 milliliters of tequila before attempting to catch a hatchling at Bogalusa Alligator Farm.

Defendant’s Resposne: Denied.

4. After consuming the above alcohol, Carver was viciously attacked by an adult alligator while attempting to complete the hazing ritual and was pronounced dead after all efforts to resuscitate Carver failed.

Defendant’s Response: Defendant admits that Carver was attacked by an adult alligator and was later pronounced dead at the scene. Defendant denies that Carver’s death was a result of Carver attempting to complete a hazing ritual on behalf of the Zeta Mu chapter of Theta Lamda Pi, Inc.

5. At the time Carver was attacked, Carver was fulfilling all the requirements to gain admittance into the defendant’s Zeta Mu Chapter.

Defendant’s Response: Denied.

6. The sole cause of Carver’s death was the negligent conduct of the defendant in violation of Louisiana Civil Code article 2315 and 2315.2.

Defendant’s Response: Denied.

PRAYER FOR RELIEF

WHEREFORE, Petitioner demands judgment against Defendant and compensatory damages for the wrongful death, mental anguish, emotional distress, and loss of enjoyment of life in the amount of \$5,000,000.

Defendant’s Response: Denied.

Respectfully submitted,

H. Keegan Lin

H. Keegan-Lin
Attorney for the Defendant

CIRCUIT COURT OF LOUISIANA

Blake Carver,

Plaintiff,

V.

Theta Lambda Pi, Inc.,

Defendant.

Case No. 17- 623

Action filed: February 19, 2018

Judge Oliver Bridges

STIPULATIONS

The parties have entered the following stipulations, which shall not be contradicted or challenged:

- 1. All exhibits are self-authenticating.*
- 2. The chain of custody for evidence is not in dispute.*
- 3. The signatures on the witnesses' statements and all other documents are authentic.*
- 4. All witnesses who were questioned by law enforcement were properly advised of their Miranda rights.*
- 5. All searches were conducted with consent, and was, therefore, proper in accordance with the law.*
- 6. All witnesses were of sound mind when giving their statements.*
- 7. The alligator was completely contained prior and during the attack.*
- 8. Exhibit 1 is an accurate picture of the alligator farm prior to the attack*
- 9. Exhibit 2 is the Pledge Report that was compiled by Taylor Parker as a duty of President of the Zeta Mu chapter of Theta Lambda Pi.*
- 10. Blake Carver is the parent of Reagan Carver.*

11. Blake Carver is not compelled to testify.

12. Exhibit 3 is an accurate Wildlife and Fisheries report compiled by Robin Winter, the Officer of Wildlife and Fisheries.

13. Reagan Carver's personality test results have not been altered by either party.

14. Reagan Carver had consumed 375 milliliters of tequila prior to her death.

15. Damages of \$5,000,000 cannot be mitigated.

BURDEN OF PROOF

Louisiana courts resolve most negligence cases by employing a duty/risk analysis, under which a plaintiff must prove five separate elements:

- 1) Whether the defendant had a duty to conform to a specific standard of care
- 2) Whether the defendant's conduct failed to conform to the appropriate standard of care
- 3) Whether the defendant's substandard conduct was a cause-in-fact of the plaintiff's injuries
- 4) Whether the defendant's substandard conduct was a legal cause of the plaintiff's injuries
- 5) Whether the plaintiff was damaged

CIRCUIT COURT OF LOUISIANA

Blake Carver,

Case No. 17- 623

Plaintiff,

V.

Theta Lambda Pi, Inc.,

Judge Oliver Bridges

Defendant.

Pretrial Order (Damages)

Order filed: May 21, 2018

- 1. Single trial on liability and damages.** Defendant has moved to bifurcate the trial. That motion is DENIED. The trial in this case will have a single phase, involving both liability and damages.

Dr. Sam Richards

My name is Sam Richards and I am currently a counseling psychologist at Southwestern State University. I received my bachelor's degree in psychology from the University of Central Washington in 1990. From there, I got my master's from William and Mary in 1993. Lastly, I came back home to Louisiana to get my doctorate in psychology from Southern Atchafalaya University in 1999. My doctoral dissertation was called *Hazing: Peer Pressure on Steroids*, where I focused on the negative effects of peer pressure seen in hazing. I have published 31 peer reviewed articles, and 16 of them were about peer pressure. I am considered one of the leading counseling psychologists in the United States, and I have testified in court a total of 8 times. My standard fee is \$800 per hour for my evaluations, and an additional \$2,500 for me testifying. Since I knew Reagan Carver personally, I am only charging half the amount for my evaluations, and \$1,500 for my testimony. My evaluation was approximately 30 hours.

Counseling Psychology is a specialty within professional psychology that maintains a focus on facilitating personal and interpersonal functioning across the life span. The specialty pays attention to emotional, social, vocational, educational, health-related, developmental, and organizational concerns. My work has primarily focused on Peer pressure, which is the influence that a group of peers has on a person. According to my research in graduate school, I found that introverts and those with more turbulent behaviors are more susceptible to peer pressure of any kind.

Reagan took my entry level psychology class in their first semester at Southwestern. Reagan was academically gifted, but socially, Reagan needed some work. Reagan struggled with a group project that I assigned the class in September of 2017. I would give the class time to work on

their projects during my lecture time, and I always found Reagan avoiding interacting with the group. I pulled Reagan aside one day and scheduled 5 appointments with Reagan.

On the first appointment on September 21st, 2017, we sat together and took the 16personalities test. Reagan's results were astounding. Reagan was classified as an ISFJ-T, easier known as a defender, personality. Scoring 100% as an introvert and 83% turbulent, it was no wonder how Reagan struggled in social situations.

On the second appointment on September 28th, 2017, I had Reagan create a list of 20 characteristics that made someone likeable. The intention of this list was to give Reagan an idea of what Reagan envied about others, and how Reagan may have some of those qualities. Reagan's list included someone who was more impulsive and fun-loving than shy and reserved. I challenged Reagan to try to be that person.

On our third meeting on October 12, 2017, Reagan informed me that Reagan was planning on joining a co-ed fraternity. I wasn't exactly on board with the idea, but when Reagan told me that it was Theta Lambda Pi, I flat out rejected it. Hazing is one of the most destructive things a person could go through. Hazing is when a social group like a fraternity or sorority beats, bullies, or torments incoming members to see how committed they are to join the organization. Campuses across the United States have seen the negative effects of hazing: students experiencing irreparable damage from beatings, students drowning, students hospitalized for alcohol poisoning, and even students committing suicide. Theta Lambda Pi has been suspended several times for hazing members during the initiation process. I informed Reagan that people Reagan's age are more likely to participate in risky behavior when they are surrounded by their peers. Reagan said: "Theta Lambda Pi doesn't haze anymore. I remember they got busted for it on the news a few years back, and nothing has happened ever since". I told Reagan that Theta

Lambda Pi was not the way to go, and that it would cause more problems. Reagan assured me that Reagan would tell me if Reagan were being hazed at all, and I promised to get theta Lambda Pi off campus if it were to happen.

That was our last meeting before Reagan died. I was not there to see if there were any hazing that night, but in my experience, if Reagan was told that Reagan's admittance into the fraternity hinged on Reagan successfully completing any acts named by Taylor Parker, or if Reagan saw other students doing those same acts despite the risks involved, Reagan would be more likely to participate in it.

I was heartbroken when I got the news. I was not surprised to hear that Taylor Parker was behind all this. Taylor was a bully in my classroom, and I had to send Taylor out of the lecture on multiple occasions. I will personally see that Taylor Parker and Theta Lambda Pi are nowhere on Southwestern's campus in the coming years.

I have reviewed all exhibits in preparation for this case. I am aware that I have up to 24 hours prior to testifying to change anything in my statement. I was able to render my conclusion within a reasonable degree of scientific certainty. I swear and duly affirm that all the information that I have given is accurate.

A handwritten signature in black ink, appearing to read 'S. Richards', written over a horizontal line.

Dr. Sam Richards

Robin Winter

My name is Robin Winter and I am 36 years old. I graduated from Bethel College with a degree in Criminal Justice when I was 23. I have been working as a Wildlife and Fisheries Officer at the Bogalusa Alligator Farm for the last 7 years. Before I got this job, I was a University Police Officer at Southwestern State University for my first 6 years in the force. I received several calls from students and eyewitnesses about the hazing at the farm. It wasn't my jurisdiction to handle the situation, but after an incident where a student got their hand bitten off, I knew that the farm needed better policing.

My current job at the farm is to make sure that the visitors follow the rules of the farm and federal law. Our department views alligators as a renewable resource that must be protected at all costs, and the department has recently spent millions to decrease the excessive hunting of our alligators. There are many misconceptions about how aggressive American Alligators are. Alligators like the ones we have at Bogalusa Alligator Farm typically feed on small mammals and fish. Attacks on humans are rare unless the alligator is provoked or threatened.

Since I started my position, the instances of hazing involving the alligators at the farm has dramatically decreased. That is something that I am very proud of. Often, I would be able to root out fraternities and sororities that were planning on hazing on my farm grounds. On one instance in late September, early October, a student by the name of Taylor Parker had been to the farm on multiple occasions within a few days. Typically, that means that a person is "scoping" the place out. I started a casual conversation with Taylor so that I could get a beat on Taylor's intentions. I asked Taylor if Taylor was interested in alligators. Taylor told me that Taylor wanted to see the hatchlings move around. I asked why, and Taylor shrugged and said, "It's just weird to see the hatchlings left alone while they're so vulnerable. It's crazy how anyone could just snatch one out

the farm without and problem”. I looked at Taylor and said, “They would have a problem from me”. Taylor nodded and walked away. Ever since then, I have been keeping a close eye on the alligators.

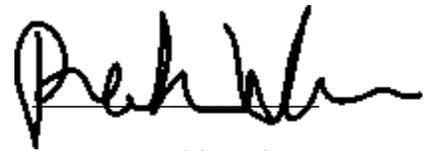
The hatchlings typically remain near the water at the farm. The adult alligators usually were between the shaded area and dry land. The older alligators were typically in the shade. From what I’ve seen, the adult alligators are the most aggressive of the bunch. They move fast on land, and faster in the water.

On Halloween of 2017, I took off the night to take my niece to go trick-or-treating around her neighborhood. I told the officer that would be taking my place to keep a careful eye on the alligators. The officer clearly didn’t adhere to my command. I was called back at around 11 o’clock because three students were seen on the farm, and there was no officer in sight. I gave my niece back to her parents and drove to the farm.

When I got there, I only saw two students. One of them was Taylor Parker. Both students looked terrified, and they were panicking. I ran over and looked in the alligator pit, only to find the third student lying in the land area next to hatchlings with blood covering the student’s body. I was not able to determine exactly where the blood was coming from, but I could tell that the student was bitten around the left side of their torso. Typically when an alligator bites their prey, they use their razor sharp teeth to lock in the flesh and spin and twist to get the flesh off, and I could see evidence of that by the marks on the individual’s body. I was able to pull the student out and provide as much first aid as I could. By the time the paramedics showed up, it was too late. The student was unresponsive and losing too much blood. The student died within an hour after the paramedics arrived.

When I questioned Taylor and the other student about it, they told me that the student fell in the alligator farm while trying to catch a hatchling. I asked Taylor if Taylor had made the student try to catch the hatchling, and Taylor didn't answer. After that, I filed an incident report, and requested the farm be closed until we got to the bottom of this. The surveillance cameras showed the victim stumbling towards the farm after speaking with Taylor, reaching in the farm, and being pulled in by an adult alligator.

I am aware of the Wildlife and Fisheries report. I am aware that I have up to 24 hours prior to testifying to change anything in my statement. I swear and duly affirm that all the information that I have given is accurate.

A handwritten signature in black ink, appearing to read 'Robin Winter', written over a horizontal line.

Robin Winter

Alex Hampton

My name is Alex Hampton and I am going to be a sophomore at Southwestern State University. I am 19 years old and I am an English major. I'm originally from Wyoming, but I came to Southwestern on an academic scholarship.

I didn't make very many friends my first few weeks of college. I tried being social--you know, going to parties and stuff--but it never really worked. I went to this Greek showcase in August, and I saw Theta Lambda Pi do this cool step routine. They seemed like a real close-knit group, and I knew that I had to be a part of it. After the routine, I spoke with Taylor Parker, who is the president of Theta Lambda Pi, and I asked Taylor about joining. Taylor laughed and said, "If I have to tell you how to join, you're not really serious about it". I felt like a loser. I explained to Taylor that I'm not much of a Greek life type of person, but that I felt like Theta Lambda Pi is where I needed to be. Taylor looked at me and shook Taylor's head. Taylor told me that Taylor admired my tenacity, and Taylor gave me the time and date for the informational meeting on September 5th.

I researched everything I possibly could about Theta Lambda Pi. I learned that Theta Lambda Pi was all about "making" its members. A person who wasn't "made" wasn't allowed to be in the fraternity. I wasn't sure what this meant until I attended the informational meeting.

At the meeting, there were at least 80 people. Taylor told us that only 5 could join the fraternity, and that Taylor knew how to weed out the rest. Taylor explained the process to us, and Taylor told us that there would be something called: "Anvil Opportunities", which were random moments throughout the day that they would try to challenge us and figure out who wouldn't make it. Taylor gave some examples, too. The Anvil Opportunities ranged from washing

Taylor's car at three o'clock in the morning, to the traditional catching a baby alligator out of the swamp near campus. It all sounded like hazing to me.

We'd have meetings every day. At first, only a few people quit. After September 20th, people started dropping like flies. By September 30th, there were only seven of us. I didn't understand why everyone gave up so fast. I was offered one Anvil Opportunity at that point, and that was to be their designated driver one Saturday night. That wasn't hazing, to me. It was just being responsible.

On October 31st, Taylor called me and told me to come to the fraternity house on campus. Once I got there, I saw Blair Doolittle and Reagan Carver and I knew we were in an Anvil Opportunity. Our first task was to drink a huge bottle of tequila. Reagan seemed hesitant at first, but after Blair and I started drinking, Reagan joined in. After we were all a little woozy from drinking, Taylor said it was time for some "real fun". Taylor blindfolded us and shoved us into Taylor's Jeep. After what felt like 20 minutes of driving, Taylor finally stopped the car and revealed where we were: the Bogalusa Alligator Farm. I almost threw up. I really wanted to be a part of Theta Lambda Pi, but I wasn't willing to risk my life. I told Taylor if I had to catch an alligator, I was out. Taylor shrugged and said "Well Blair and Reagan, it's down to you two. Who is really committed?".

I was furious. All Taylor told me was a lie. These "opportunities" were just Theta Lambda Pi's way of trying to hide the fact that they were hazing. I called an Uber and left before I could see anything else that happened. I tried to convince Blair and Reagan to leave with me, but they both shook their heads and said they would do whatever it takes. I couldn't wait to get back to school and report Taylor and Theta Lambda Pi to the president of the university.

The next day, I'm watching the news and I see that Reagan got attacked by an alligator! I felt bad about leaving Reagan, but I knew Reagan would do anything to please Taylor. Out of all the pledges, Reagan had the award for completing the most Anvil Opportunities. I hope Taylor gets what Taylor deserves for ending Reagan's life.

I am not aware of any of the exhibits. I am aware that I have up to 24 hours prior to testifying to change anything in my statement. I swear and duly affirm that all the information that I have given is accurate.

A handwritten signature in black ink, appearing to read 'Alex Hampton', written over a horizontal line.

Alex Hampton

Taylor Parker

My name is Taylor Parker. I am 21 years old and I will be a senior at Southwestern State University. I'm originally from Compton, California. I moved to Louisiana to start a different life. I am currently a Math major, but most importantly, I am the president of the Zeta Mu chapter of Theta Lambda Pi.

Compton was rough growing up. I was exposed to a lot of unsavory things at a young age. One thing that I took from all that is that everyone is built from the adversity that they go through. I was very fortunate to come across Theta Lambda Pi my freshman year. They took me in and treated me like family. I knew I had to do the same for someone else.

The former president, Darby Frugeé, taught me about how to continue the family aspect of Theta Lambda Pi. Darby explained that every member had to be selfless, genuine, and caring. Darby explained how to get rid of the members who do not have those qualities in their hearts. Darby called this process “making” the members. Members could be made through Anvil Opportunities, which are random moments where I would ask them to drop everything that they're doing to test if they have the qualities of a Theta Lambda Pi.

Let me be perfectly clear, Theta Lambda Pi is an organization built from integrity. Therefore, we do not haze our pledges. The Anvil Opportunities completely optional and have no real influence on our decision to keep members. If we do not know a pledge very well, we use those as a tool to familiarize ourselves with them.

The Fall Semester of 2017 had one of the largest pledge groups that Theta Lambda Pi had ever seen. This was both good and bad. See, the goal of every Greek organization is to draw a lot of interest and create a great reputation. If I were to try to continue the family aspect of Theta Lambda Pi, I would have to cut a group of 87 pledges to a group of 5 members. That's not easy.

At the informational meeting on September 5th, I gave the pledges the ideas that I would ask them to do ridiculous things for their Anvil Opportunities. This was to quickly weed out the ones that genuinely wanted to be a part of the organization. Within 5 days, the numbers dropped from 87 to 33 pledges. I had to be doing something right. Every week, I had to do a Pledge Report for the graduate chapter to monitor whether I should cut. On this report, there are the number of total pledges at the beginning of the week, the number remaining, and any comments that I would have.

I started making the Anvil Opportunities at weird times like 3:42 a.m. Like clockwork, the pledges dropped from 33 on September 20th, to 7 on October 1st. On October 1st, I had started making calls for pledges to meet me at random places. The trick was to avoid giving them much detail about what we were going to do so that they could draw their own conclusions. That showed me if they genuinely believed in the integrity of the organization. On October 31st, I called Alex Hampton, Blair Doolittle, and Reagan Carver to meet me at the fraternity house on campus.

I jokingly suggested that we should down a bottle of tequila to get the festivities started, and Blair, Reagan, and Alex took me seriously and started drinking immediately. I sometimes forget how much power I have over pledges. I decided to play with the pledges a little more and blindfolded them and took them to the alligator farm just to see how they would react. Alex immediately chickened out and left before I could even say it was a joke. Blair and Reagan stayed by my side, and that's how I knew they deserved to be a part of Theta Lambda Pi.

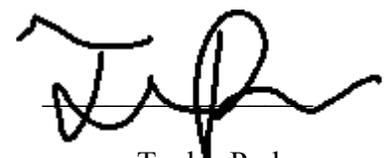
We sat by the swamp and talked about family. After a while, I noticed that Reagan was more of a lightweight than I expected. Reagan started acting very strange and talking about how Reagan's therapist hates Theta Lambda Pi. Blair and I tried to get Reagan to calm down, but

Reagan was wild. Reagan told us that Reagan believed that we were all a family and that Reagan would do anything for us. I was both impressed and nervous. Reagan started walking towards the alligator farm, and Reagan yelled, “Theta Lambda Pi for life”, and reached Reagan’s arm inside. It was dark, but all I saw was a huge shadow jump out of the farm, and Reagan fell in. I just stood there for a while. I'm still not very sure of what happened. Blair called 9-1-1, and next thing I knew, I was identifying a mangled body as Reagan Carver.

The next few weeks were a blur. I felt guilty about Reagan falling in the alligator farm because I told the pledges at the informational meeting that I would make them catch a baby alligator. I was joking at the time, and I never intended for anyone to go in the farm. I don't remember ever clarifying that with any of the pledges.

I decided to make an honorary spot for Reagan. What happened was traumatizing, but it wasn't hazing.

I am aware of map of the farm as well as the pledge report. I am aware that I have up to 24 hours prior to testifying to change anything in my statement. I swear and duly affirm that all the information that I have given is accurate.



Taylor Parker

Blair Doolittle

My name is Blair Doolittle and I am 18 years old. I graduated high school a year early and now I will be a sophomore at Southwestern State University. I'm an Atmospheric Science major and a Spanish minor. I live at home in Bogalusa, Louisiana. I am also a member of the Zeta Mu chapter of Theta Lambda Pi.

I always fancied myself as a cool person. Most people like me when they meet me, and others don't mind me, I guess. I've always had a lot of friends, and it's easy for me to relate to different people. I get that from my dad. My dad went to Southwestern, too. He planned on joining Theta Lambda Pi, but he didn't make it through the hazing process. He told me that back in the day, Theta Lambda Pi had the toughest hazing in Louisiana. He had to fetch a baby alligator out of the alligator farm near campus!

That didn't scare me away from joining. I knew Taylor Parker because Taylor has spoken to my graduating class about Greek life at Southwestern. Taylor was very charismatic, and I knew we'd end up being best friends. When I showed up to the informational meeting on September 5th, I saw that there were like 90 other pledges. I was intimidated at first, but when Taylor said that Theta Lambda Pi was only accepting 5 pledges as members, I relaxed a little. I'm always in the top 5 of anything that I do.

Taylor had made this joke about catching alligators from the alligator farm near campus. No one seemed to think it was very funny, except me. I saw that the other pledges didn't have much of a sense of humor. Taylor told us about Anvil Opportunities and how it would separate the true members from the dead weight. The Anvil Opportunities were just that; opportunities. No one was required to complete them or anything. It just looked better if you did.

Unlike the other pledges, I had an Anvil Opportunity every other day. My first one was to help some of the old members with their Spanish homework. The next few were to be the designated driver on wild weekends. Then I started to have to do a lot of pushups. There was one time that I couldn't finish my pushups, and Taylor threatened to paddle me with the Theta Lambda Pi paddle. I'll admit, I was scared when Taylor threatened me. I finished my pushups, and Taylor looked real impressed. Taylor told me that Taylor was never actually going to paddle me, and that I showed perseverance and respect by taking Taylor seriously. I felt silly afterwards. Of course, Taylor wouldn't paddle me, Taylor wouldn't hurt a fly.

By September 20th, a bunch of pledges dropped. One pledge quit because they claimed that they were forced to drink a lot of alcohol as an Anvil Opportunity. They never made an official complaint, and that guy was a liar, anyway. On October 31st, Taylor asked me and two other pledges to meet Taylor at the fraternity house on campus. I was nervous, but Taylor never told me what we had to do, so I didn't assume anything. We drank, and Taylor blindfolded us and said we were going to have some "real fun". I was excited. I canceled my plans to go to a Halloween party so that I could be at the fraternity house, so I hoped Taylor was taking us on a spooky adventure.

We sat by the alligator farm and we talked. Taylor told us about Taylor's hometown, Compton, and how rough it was. You couldn't tell how much Taylor has been through just by Taylor's looks. I remember Reagan becoming very emotional and telling us that Reagan's therapist hated Theta Lambda Pi because we had a history of hazing. Reagan started running around and yelling about how we are a real family. Reagan started walking towards the alligator farm and shouted, "Theta Lambda Pi for life". It was dark, but I saw Reagan's hand go into the farm, and then Reagan fell in.

I freaked out. I kept trying to call 9-1-1, but I forgot the number. I get real confused under pressure. I dialed 9-1-1, and just stood there. Everything happened so fast... Taylor brought me home. Once we got in the driveway, Taylor turned to me and said, "I think I messed up". I asked Taylor what Taylor meant, and Taylor said, "Reagan went into that alligator farm because of me. Reagan's blood is on my hands". I told Taylor that it all happened too fast to understand everything. I told Taylor not to blame it on anyone. It was a freak accident.

I am aware of map of the farm as well as the method map. I am aware that I have up to 24 hours prior to testifying to change anything in my statement. I swear and duly affirm that all the information that I have given is accurate.



Blair Doolittle

Dr. J.D. Cheatham

My name is J.D. Cheatham, I am 54 years young, and I am a psychiatrist with a specialty in children and adolescence. I received my bachelor's degree from the University of Houston, where I double majored in Psychology and Biology. I went to the University of Pennsylvania for my Medical Degree. I completed my Residency in Pennsylvania and became a Board-Certified psychiatrist after 12 years of secondary school and 2 years of tests. I have been a psychiatrist for 17 years now. I have published at least 50 peer-reviewed articles. 20 of them are about the misconceptions of peer pressure. I was called to examine the report of Dr. Sam Richards, whom I believe made a hasty conclusion with little evidence to support it. I utilized my widely-accepted method of comparative analysis. This is where I took Dr. Richards's methods and conclusions and compared them to the standard practices taken in the field of psychology. I charge an hourly rate of \$350, and an additional \$2,400 for my testimony. I examined this report for 45 hours.

Firstly, I'd like to point out that psychologists and psychiatrists are not the same thing. Psychologists focus more of surface-level behaviors and thoughts, whereas psychiatrists focus on the neurological and chemical inner-workings of the body that may cause those behaviors. Therefore, we tend to disagree about certain things.

Peer pressure, in my expert opinion, is the effect others may have on the prefrontal cortex and the brain's limbic system when deciding. The prefrontal cortex focuses on rational thought processes like weighing the pros and cons. The limbic system is in control of emotional responses like outbursts of anger, or tears of sadness. In teenagers, the chemical called "dopamine" is directly linked to transmitters in the brain. Dopamine is the chemical that makes people feel happy, or euphoric. A compliment to a teen could, quite literally, make them feel good. This could ultimately affect a teen's decision-making. With that said, I have found three

key mistakes in Dr. Richards's examination of Reagan Carver, and Dr. Richards's speculation as to whether Reagan would be more susceptible to peer pressure.

The first mistake comes from the personality test that Dr. Richards's administered to Reagan Carver. The results of 100% introverted and 83% turbulent behaviors are too extreme for a conclusion. Meaning, that this should have thrown a red flag in the mind of Dr. Richards, and Dr. Richards should have administered the test more than once. It is possible that the results are accurate, but without more data, there is no way to know for sure.

The second mistake comes from Dr. Richards's conclusion that Reagan would be more susceptible to peer pressure. The problem is that introverted and turbulent behaviors are not directly linked to the neurological responses that a teenager's brain would have during an instance of peer pressure. It is more of a general assessment of what the decision-making process could be, but not exact enough to determine an outcome. For Reagan to be "susceptible" to peer pressure, Reagan would have to have higher levels of dopamine influencing Reagan's decision-making at the time. There is just not enough evidence.

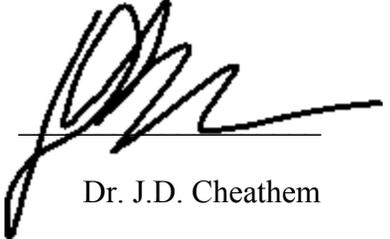
Lastly, I believe that Dr. Richards suffered confirmation bias. Confirmation bias is when a professional misconstrues the data to support their hypothesis. Dr. Richards does not speak very highly of Theta Lambda Pi and associates them with destructive behaviors. Dr. Richards assumes that Dr. Richard's opinion of them would have the same influence on Reagan Carver who may not have shared that same opinion.

I would be remiss if I did not acknowledge that Dr. Richards's evaluation had some accurate components to it. Allowing a patient to recognize behaviors and trait that they admire and encouraging them to adhere to those traits is a great preventative measure for peer pressure.

Moreover, it is still possible that Taylor Parker had more influence on Reagan's actions than Dr. Richards did, making Dr. Richards's conclusions slightly more accurate.

My conclusion is simple. The issue of whether Reagan's decision-making was compromised by the influence of peer pressure does not have enough data to render a conclusion beyond it being possible, but not likely. Meaning that it is possible that Reagan was compromised by peer pressure on October 31st, but it is not likely.

I have reviewed all exhibits in preparation for this case, including the report of Dr. Sam Richards. I am aware that I have up to 24 hours prior to testifying to change anything in my statement. I was able to render my conclusion within a reasonable degree of scientific certainty. I swear and duly affirm that all the information that I have given is accurate.



Dr. J.D. Cheatham

Exhibit 1

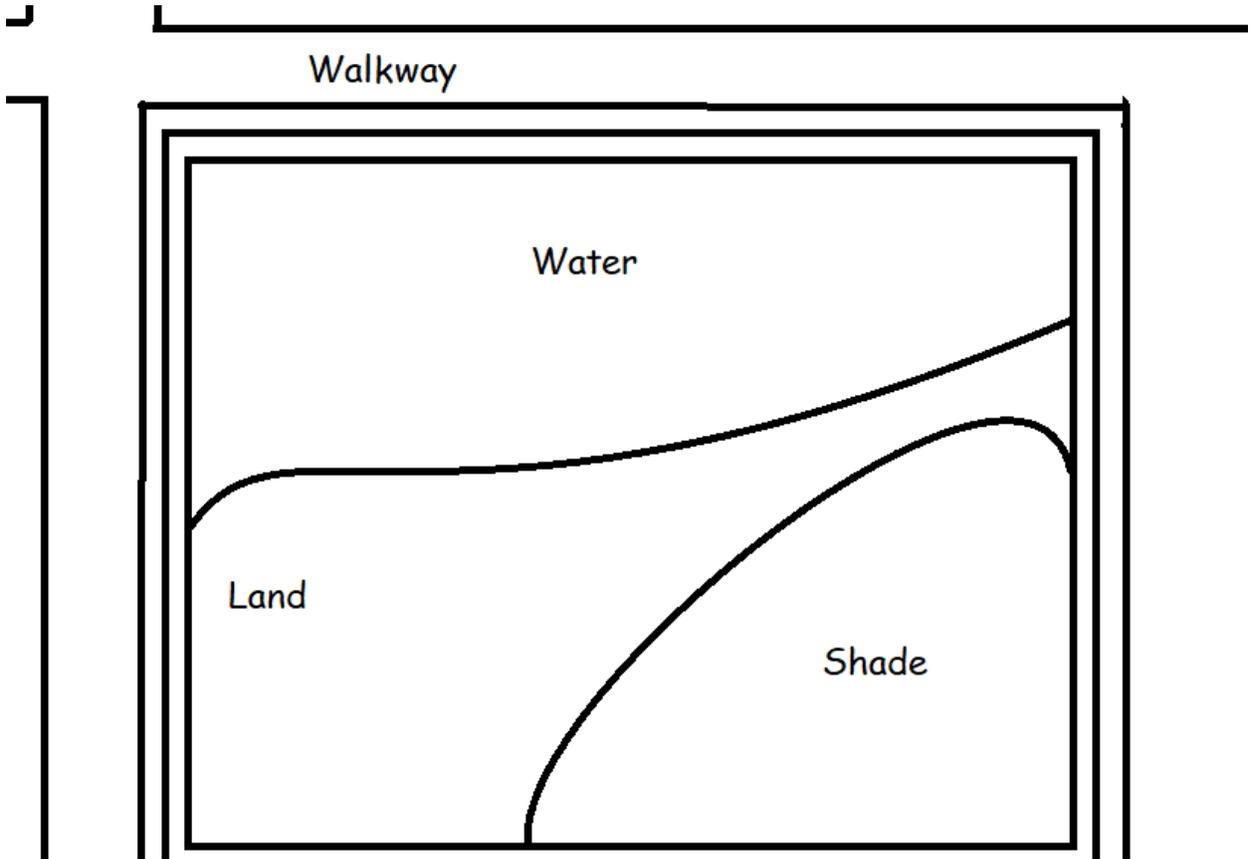


Exhibit 2

Pledge Report (Fall 2017)

9/5/2017 Informational meeting.	87 pledges in attendance.	87 pledges to start the semester.	I will only accept 5 pledges as members by November 1 st .
9/12/2017 Week 1 census	33 pledges in attendance.	54 dropped after 5 days.	I was not expecting such a swift decline.
9/19/2017 Week 2 census	33 pledges in attendance.	0 dropped this week.	N/A
9/26/2017 Week 3 census	10 pledges in attendance.	13 dropped this week.	I started the Anvil Opportunities after 3 a.m. this week.
10/3/2017 Week 4 census	7 pledges in attendance.	6 dropped this week.	A few pledges complained about the Anvil Opportunities. They're accusing me of hazing them.

10/10/2017	7 pledges in attendance.	0 dropped this week.	I will be more relaxed with the Anvil Opportunities until the accusations blow over.
Week 5 census			
10/17/2017	7 pledges in attendance.	0 dropped this week.	N/A
Week 6 census			
10/24/2017	7 pledges in attendance.	0 dropped this week.	N/A
Week 7 census			
10/31/2017	7 pledges in attendance.	0 dropped this week.	I will determine the final 5 by 12 a.m. tonight.
Week 8 census			

Exhibit 3

Incident Report



REPORTED BY: Officer Robin Winter
TITLE / ROLE: Agent

DATE OF REPORT: 10/31/17 01:43 am

INCIDENT NO.: 17-0034

INCIDENT INFORMATION

INCIDENT TYPE: Alligator Attack
LOCATION: Bogalusa Alligator Farm
CITY: Bogalusa
STATE: La
DATE OF INCIDENT: 10/31/17
ZIP CODE: 70427

SPECIFIC AREA OF LOCATION (if applicable):

INCIDENT DESCRIPTION

Three students from Southwestern State University were discovered by the hatchling pin on October 31, 2017 at 01:15 am. Reagan Carver attempted to catch a hatchling and was attacked by a mother alligator. Carver suffered wounds on the left side of Carver’s neck, torso, and leg. Taylor Parker and Blair Doolittle, the other two students with Carver, claim that Carver was not forced or coerced to catch a hatchling. Alcohol was detected in each students’ system, with Doolittle and Parker measuring .15 on the BAC scale. Carver was pronounced dead at 2:22 am at Bell- Leon Memorial Hospital.

NAME / ROLE / CONTACT OF PARTIES INVOLVED

- 1. Taylor Parker/ President of Theta Lambda Pi/ tparker12@bulldogs.ssu.edu
- 2. Blair Doolittle/ Pledge of Theta Lambda Pi/ bdoolittle3@bulldogs.ssu.edu
- 3.

NAME / ROLE / CONTACT OF WITNESSES

- 1. Same as above
- 2. Same as above
- 3.

POLICE REPORT FILED? Yes

PRECINCT: 214

REPORTING OFFICER: G. Perlaki

PHONE: (985)900-8767

FOLLOW-UP ACTION

Bogalusa Police Department began hazing investigation on 11/1/17.

SUPERVISOR Tonya Lewis-
NAME: Nelson _____

SUPERVISOR
R Tonya Lewis-
SIGNATURE: Nelson _____

DATE
: 10-31-17

Exhibit 4

ISFJ-T

