

# Exhibit C



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ATTORNEY AT LAW

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Jeffrey F. Jones  
VP Office of Finance and Administration  
Williams College  
Hopkins Hall  
880 Main Street  
Williamstown, MA 01267

Re: FERPA Request

December 4, 2016

Dear Attorney Jones,

I am writing to request that Williams College deliver copies of all of John Doe's non-academic educational records, except to the extent that the records contain disciplinary issues of an academic nature, e.g. Honor Committee proceedings, to him via my office. My mailing address is noted above. I am also writing to request a review of all of the audio recordings from the current investigation if transcripts cannot be provided.

As you are aware, the Family Educational Rights and Privacy Act (FERPA) grants students the right to inspect and review the student's education records within 45 days after the day the College receives a request for access.

John submitted written requests for copies of all transcripts from Allyson Kurker's investigation on multiple occasions to Dean Bolton and Dean Sandstrom: June 8, 2016; June 14, 2016; August 22, 2016; September 1, 2016.

These requests were not honored and were flatly denied by Dean Sandstrom on September 1, 2016, who wrote, "the parties in sexual misconduct cases are not entitled to transcripts or tapes of the investigator's interviews with others under either the College's procedures (sic)." The College's procedures state that students have "(1) **The right to inspect and review the student's education records within 45 days after the institution receives a request for access.**

Even though the law allows 45 days, at Williams requests are normally honored at the time they are submitted. Students should submit their requests to the persons maintaining the records to which they wish access, e.g. the registrar, dean, department chair, or other appropriate officials.” (<http://dean.williams.edu/policies/student-records/>)

Please note that there is no exception to records maintained under disciplinary proceedings of any nature either in the College’s procedures or in FERPA. Audio recordings of investigations are provided for in Section I(d) of the College’s Investigation procedures; “The statements of the complainant and respondent will be recorded (audio).” All records of any medium made by an educational institution are considered “educational records” under the law.

However, John was/is entitled to inspect all his educational records, under FERPA, as you acknowledged in your email dated September 16, 2016. In lieu of sending him transcripts, the school officials should have made arrangements for access and notify the student of the time and place where the records may be inspected or should have provided copies no greater than 45 days after June 14, 2016, the time of John’s first request. There is no “formal FERPA request” procedure by which a Williams College student is required to use to review educational records and the request was made by John, as aforesated, in a manner consistent with the College’s policy cited above.

You may consider this letter John’s final request before filing a complaint with the Family Policy Compliance Office at the U.S. Department of Education. That complaint will be filed January 18, 2017.

If you have any questions regarding this matter, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink that reads "Stacey Elin Rossi". The signature is written in a cursive, flowing style.

Stacey Elin Rossi, Esq.