

1 regarding sexual touching of males at a bar during the Seattle
2 Annual Conference and an email of an anonymous complaint
regarding Schwetz in February of 2019.²⁹

3 Defendant Kristen Vehrs, Executive Director for the AZA, conducted a cursory
4 investigation that involved her interviewing Defendant Schwetz, who conceded she was
5 intoxicated during these incidents, and one other, unnamed individual.³⁰ The investigation
6 resulted in the following determination:

7 Vehrs then verbally sanctioned Schwetz and told her to get help for
8 her drinking problem. She promised she would. Vehrs further
9 warned her that if her conduct continued at further AZA
conferences then she would face expulsion from future conferences
and a report to the Henry Vilas Board of Directors.³¹

10 With this information in mind, the context of [REDACTED] claims, including his claims
11 against the individual defendants, takes on greater clarity. During the first night of the
12 conference, September 23, 2018, Defendant Schwetz returned to the Sheraton hotel room she
13 shared with [REDACTED] visibly intoxicated and upset. Mrs. Schwetz told [REDACTED] that she
14 wanted to have sex with him. She then grabbed Dr. [REDACTED] penis. [REDACTED] demanded Mrs.
15 Schwetz stop and pushed her away.³²

16 On the second night of the conference, September 24, 2018, [REDACTED] and Defendant
17 Schwetz attended AZA's sponsored "Icebreaker"³³ held at the Seattle Aquarium, where a
18 considerable amount of alcohol was made available by the AZA to those in attendance. Upon
19 leaving the Icebreaker event and prior to returning to the Sheraton, Defendant Schwetz was
20 visibly intoxicated.

21 When Defendant Schwetz later returned to the hotel room, she again became
22 inappropriate and sexually aggressive towards [REDACTED] During the night, [REDACTED] woke up
23
24

25 ²⁹ McLean Decl., Ex. 6.

26 ³⁰ *Id.*, Ex. 7.

27 ³¹ *Id.*

28 ³² Complaint for Damages, ¶ 51.

³³ [REDACTED] Decl., Ex. 3.