



Ethics and Compliance Hotline

1. **Introduction and Purpose:** The John Marshall Law School expects its students, faculty, and staff to perform their duties in accordance with applicable laws and regulations, JMLS policies and procedures, and to the highest ethical standards. JMLS's Ethics and Compliance Hotline provides a mechanism to report possible illegal, unethical, or improper conduct when the normal channels of communication have proven ineffective or are impractical under the circumstances. Please report misconduct through the Hotline if you are unsure where to report your concerns, if you do not feel comfortable reporting your concerns through established channels of communication, or if you wish to report your concerns anonymously.
2. **Hotline Access:** The Hotline is available 24 hours a day, 7 days a week, by dialing Ext. 302 or 312.994.1100. Do not use the Hotline for emergency situations. If an emergency situation requiring immediate attention exists or a crime is occurring, please dial 911, then contact JMLS Security at Ext. 501. Reports may also be submitted in writing to Jorge Rovelo, Associate General Counsel and Chief Compliance Officer, via email at jrovelo@jmls.edu or via U.S. mail at The John Marshall Law School, 315 S. Plymouth Court, Chicago, Illinois 60604. In situations where you believe a conflict of interest may exist, reports may also be submitted in writing via email or U.S. mail to the General Counsel and Assistant Dean for Human Resources, the Dean, or the President of the Board of Trustees.
3. **Hotline Reporting Examples:** All JMLS students, faculty, and staff serve a vital role in ensuring that JMLS maintains its integrity and commitment to ethical conduct and compliance. If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, then review such concerns with your supervisor or an appropriate dean, or use the Hotline to report your concerns. Examples of potential reports that can be submitted through the Hotline include, but are not limited to:
 - a. **Financial:** Accounting or internal control issues and practices, fraud, theft, or other financial-related misconduct or misuse of funds.
 - b. **Safety:** Unsafe conditions, environmental issues, vandalism, or other safety matters.
 - c. **Academic:** Misrepresentation of credentials, academic dishonesty, and other academic violations.
 - d. **Human Resources:** Harassment, discrimination, threats, or other forms of misconduct.
 - e. **Information Technology Systems:** Data privacy, confidentiality, or other waste or abuse of resources or information.

4. **Requested Content for a Report:** To ensure that JMLS has enough information to conduct a proper and thorough investigation, please provide as much of the following information as possible while submitting a complaint through the Hotline, including:
 - a. The type of issue(s) you are reporting;
 - b. The person(s) involved;
 - c. Basic information regarding the incident(s) you are reporting (e.g., time, date, place);
 - d. Any other relevant details you think may aid JMLS in conducting a potential investigation; and
 - e. Your contact information, if you choose to provide it.
5. **Anonymous Reports:** This policy allows for the submission of anonymous complaints. Concerns expressed anonymously will be reviewed and may be investigated based on the following considerations:
 - a. The seriousness of the issue(s) raised;
 - b. The credibility of the concern; and
 - c. The likelihood of confirming the allegation from attributable sources.
6. **No Retaliation/False Reports:** JMLS prohibits retaliation against anyone who makes a good-faith report through this Hotline, or who participates in an investigation, even if sufficient evidence is not found to substantiate the report. JMLS will take appropriate action against anyone determined to have engaged in retaliatory conduct. Knowingly making false reports through this Hotline may subject the reporter to discipline, up to and including termination.
7. **Investigative Process:** JMLS takes each report submitted through this Hotline seriously and will respond to each credible report by conducting a prompt and thorough investigation of the allegation. Each report will be reviewed to determine the significance and urgency of the alleged violation, whether sufficient information exists to initiate further review, and the most appropriate steps to investigate and potentially resolve the allegation. JMLS will make a good-faith effort to ensure that all investigations are completed in a timely manner consistent with the complexity of the issues involved.
 - a. **Primary Investigator:** In general, the Primary Investigator is the Associate General Counsel and Chief Compliance Officer. However, where necessary due to a potential conflict of interest or based on the nature of the allegation, a complaint may be referred to the General Counsel and Assistant Dean for Human Resources, the Dean, the President of the Board of Trustees, or to outside legal counsel for a determination on how to proceed. Additionally, in some instances, matters may also be referred to law enforcement or regulatory agencies for further investigation.

- b. Initial steps:** At the outset of an investigation, the Primary Investigator will work with the appropriate JMLS officials and counsel to determine whether, in accordance with applicable JMLS policies and applicable laws or regulations, an employee or student who is the subject of an investigation should be placed on administrative leave or suspended, or if other interim measures are appropriate while the investigation is ongoing. Interim measures may include, but are not limited to, steps to protect the Complainant, other witnesses, or the broader JMLS community during the course of the investigation.
- c. Purpose of investigation:** The purpose of the investigation is to evaluate information provided by the Complainant. Information gathered through the review of materials and witness interviews is evaluated to determine whether sufficient evidence exists to support a conclusion regarding the allegation. An objective process is followed to evaluate relevant internal and external information and documentation.
- d. Investigation steps:** In general, the investigative process will consist of the following steps:

 - i.** If the Complainant does not submit an anonymous complaint, then the Primary Investigator will contact the Complainant as soon as possible to schedule a time to meet in person to discuss the facts giving rise to the complaint. Following this initial meeting, the Complainant may be asked to provide a written statement that describes his or her concerns. The Primary Investigator may ask the Complainant to provide additional information or documentation as the investigation develops.
 - ii.** If the Complainant does submit a complaint anonymously, then the Primary Investigator will determine the best course of action based on the information provided by the Complainant in his or her anonymous report.
 - iii.** The Primary Investigator will conduct meetings with any necessary witnesses, including any staff, faculty, or students who are the subject of the complaint. After these meetings, parties to the complaint may be asked to prepare a written statement in response to the allegations. The Primary Investigator may also consult with members of the JMLS administration or outside consultants or legal counsel as necessary to determine the proper scope of the investigation, the compliance issues and risks involved, the individuals and officials who should, or should not, be involved in the investigation, witnesses who should be interviewed, and any documents that should be collected.
 - iv.** The Primary Investigator will maintain a permanent record of all investigation-related documents, including, but not limited to, documentation related to all material and relevant facts, statutory and regulatory guidance or requirements, applicable policies and

procedures, witness statements, photographs, videos, invoices, statements, legal analysis, and other relevant considerations.

- v. At the conclusion of an investigation, the Primary Investigator will prepare a final written report with findings and recommendations. This final written report should address whether the reported incident is substantiated (i.e., there is substantial evidence to support the reported misconduct), unsubstantiated (i.e., there is substantial evidence to deny or refute the complaint), or whether there is insufficient evidence to make a final determination. The report should also contain any recommended (i) remedial measures; (ii) disciplinary sanctions; and (iii) changes to JMLS policy, procedure, or practices relevant to the reported issue.
- vi. The Dean will review the final written report and may either accept its findings and recommendations or request that the investigation continue. If the Dean is the subject of the complaint, the President of The John Marshall Law School Board of Trustees will review the review the final written report and may either accept its findings and recommendations or request that the investigation continue.
- vii. Once an investigation is complete and the final findings and recommendations are accepted by the Dean, or if necessary, the President, JMLS will take appropriate corrective if necessary and, where appropriate, the investigation's findings and recommendations will be communicated to the reporting individual and to the subject of the complaint.
- viii. All inquiries concerning the status of an investigation should be directed to the Primary Investigator.
- ix. Depending on the situation and applicable laws, regulations, and policies, the results of an investigation may be discussed with the Complainant after a final determination has been made. However, for privacy and confidentiality reasons, investigatory reports and witness statements will not be shared with the Complainant, the subject of the complaint, or any witnesses.
- x. The results of the investigation finding a substantiated complaint will be placed in a staff, faculty, or student's personnel or student file if remedial measures or disciplinary sanctions are issued as a result of the investigation.

8. Confidentiality During the Investigative Process: JMLS will take reasonable steps to protect the confidentiality of those involved in the investigative process.

- a. Unless otherwise required by applicable laws, regulations, or JMLS policies, all matters during the course of an investigation are classified as "confidential" and are provided only to JMLS employees or outside counsel or consultants who have a business need for this information. Anyone involved

- JMLS Harassment Prevention/Sexual Assault Hotline: 312.427.2737 ext. 506

Employee-Related Complaints

- Where possible, grievances with other employees should be reported to an employee's direct supervisor or to the Assistant Dean for Human Resources.
- Complaints related to employment decisions or actions should be submitted through the Employee Grievance Process.

Student-Related Complaints: See the Student Complaint Policy at <https://www.jmls.edu/students/complaint-policy.php>.

Suggestions for JMLS's Improvement: Please submit suggestions for cost-effective ideas to improve the school, efficiency, morale, or any other aspect of the JMLS community via email to ideas@jmls.edu.

Administrative policy adopted February 22, 2018; effective immediately.