



PERSONAL & CONFIDENTIAL

August 3, 2018

VIA Certified Mail, In-Person Delivery and Email

Professor Johanne Brunet
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UW-Madison
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Madison, WI 53706

jbrunet@wisc.edu

NOTICE OF CHARGES FOR DISMISSAL PURSUANT TO UWS 4.02

Dear Professor Brunet:

I write, pursuant to UWS 4.02, Wisconsin Administrative Code, UW-Madison Faculty Policies and Procedures (FPP) Chapter 9. Pursuant to FPP sec. 9.06.C.3, I am preparing to invoke dismissal for cause proceedings against you. I am writing to present to you a summary of the evidence obtained during the investigation and invite you to participate in voluntary and confidential settlement negotiations.

As you know, I received a complaint filed against you pursuant to Chapter 9 of the UW-Madison Faculty Policies and Procedures (FPP), dated February 2, 2018. The complaint alleges that you have engaged in misconduct (other than scholarly misconduct) that could warrant discipline or dismissal from your faculty appointment at the University. The complaint alleges that you have engaged in behavior that violates university policies or rules, that you have engaged in conduct that adversely affects the performance of your responsibilities to the University as described in Chapter 8 and/or 9 of Faculty Policies and Procedures, and that your conduct with students in your lab created a difficult work and learning environment in violation of the University's policies on hostile and intimidating behavior and discrimination.

On March 1, 2018, I notified you that I selected Professor Ann C. Palmenberg to conduct the investigation into the allegations, as required in FPP 9.06A. You were given the opportunity to state an objection to my selection of Professor Palmenberg as investigator, and you did not raise an objection to her selection. Professor Palmenberg has now completed her investigation and a final copy of her investigative report (dated July 3, 2018) and exhibits are attached.

Pursuant to FPP 9.06.B, following receipt of Professor Palmenberg's report, on July 20, 2018, I met with recent past chairs of the University Committee and the Committee on Faculty Rights and Responsibilities. They have given me their advice as to the action that should be taken in this matter.

Office of the Provost and Vice Chancellor for Academic Affairs

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I am now prepared to invoke dismissal for cause, pursuant to FPP9.06.C. and Chapter UWS 4, Wisconsin Administrative Code from your zero-dollar faculty appointment here at the UW-Madison. I have concluded that there is just cause for your dismissal from the faculty as defined in FPP 8.02 and FPP 9.03, based on the conclusion that five of the seven charges brought against you were determined to be confirmed. This action on the part of the University is separate from your appointment as a USDA employee.

Section 9.03, Cause for Dismissal, provides, in part:

“No faculty member shall be subject to dismissal except for just cause, based upon a determination that the faculty member’s conduct directly and substantially affects adversely, to a degree greater than that reserved for disciplinary action, the ability to carry out satisfactorily his/her responsibilities to the university.”

Section 8.02, Faculty Duties and Responsibilities, provides, in part:

“A. FUNDAMENTAL RESPONSIBILITIES. The university faculty are responsible for teaching, research or other scholarly activity appropriate to the discipline, and public service. Furthermore, every faculty member has an obligation to maintain professional honesty and integrity, to seek knowledge and to share that knowledge freely with others. No member of the faculty shall be absent from his/her classes or other regular duties at the university except by the permission of the chancellor or appropriate dean. Faculty members shall avoid a concentration of class hours that is detrimental to effective teaching. It is the responsibility of faculty members to carry out duties assigned by the department, and to share in the governance of the institution as a whole.”

In making my determination, I have reviewed the findings that five of the seven charges brought against you were confirmed. The evidence to which I refer is the investigatory report and attachments submitted by Professor Ann Palmenberg, who was assigned to investigate the following allegations made against you:

1. Whether you engaged in behavior that could be described as “unwelcome...pervasive or severe enough that a reasonable person would find it hostile and/or intimidating and that does not further the University’s academic or operational interests” and/or “is unacceptable to the extent that it makes the conditions for work inhospitable and impairs another person’s ability to carry out his/her responsibilities to the university” in violation of Faculty Legislation II-332, Part I;
2. Whether your behavior evidences an “abuse of authority, such as using threats or retaliation in the exercise of authority, supervision, or guidance...” in violation of Faculty Legislation II-332, Part I;
3. Whether your behavior has included “abusive expression ... directed at another person in the workplace, such as derogatory remarks or epithets that are outside the range of commonly accepted forms of disagreement, disapproval, or critique in academic culture and professional setting that respects free expression” in violation of Faculty Legislation II-332, Part I;

4. Whether you have engaged in discrimination or discriminatory harassment, including but not limited to conduct that adversely affects any aspect of an individual's employment, education, or activities, or has the effect of denying equal treatment to an individual on the basis of an individual's protected status, in violation of Regent Policy 14-6;
5. Whether you have violated FPP Chapter 8.02, section B -- the obligation of faculty members "to maintain professional honesty and integrity" -- through disrespect of personal boundaries and workspace, and/or making demeaning and insulting comments in public settings or any other conduct;
6. Whether you have failed to maintain standards of professionalism, honesty, and integrity through a violation of the terms of any letter of expectation issued to you by your chair;
7. Whether, though the conduct alleged in this letter, you have engaged in conduct that adversely affects your performance of your responsibilities to the university as defined in FPP 9.02 and 9.03.

Professor Palmenberg's investigation included face-to-face interviews with 30 individuals, phone interviews with 12 individuals, one interview conducted using Skype, and one involving written questions. She also interviewed you on three occasions and received from you a number of documents, including a list of individuals you suggested she contact (Ex 08), a list of letters of recommendation you have been asked to write (Ex 09), the letter you wrote to me in March of 2018 (Ex 10), a list of questions you suggested she could ask of interviewees (Ex 11), your response to the allegations included in Mr. Weisse's report (Ex 12), a document you wrote in April in response Dr. Paskewitz's emails (Ex 13), and your detailed response to her extensive list of questions regarding the allegation raised against you (Ex 14). In addition, Professor Palmenberg gathered, received and reviewed an array of additional documents, including ~400 e-mail messages and unsolicited letters of support on your behalf.

While she received former CALS HR Manager Ben Weisse's investigative report regarding your behavior that was conducted on behalf of the Dean's office in the College of Agricultural and Life Sciences, she independently interviewed those who spoke with Mr. Weisse, as described in her report:

"For interviews overlapping with Mr. Weisse's roster, individuals were asked point-by-point, about the contents of his notes. (His notes were my starting point so as not to overly repeat previous testimony.) The possibility of edits, redactions, clarification or omission in these notes was offered for each quote, cited incident or documented observation. Individuals were then asked whether the overall tone and content of their transcript accurately reflected Mr. Weisse's full interview" (pg 4).

Professor Palmenberg purposefully interviewed additional individuals in order to validate Mr. Weisse's findings, and she concluded that Mr. Weisse's report is accurate (page 8). She also took into consideration individuals who said that they had not witnessed or experienced negative behavior that has been ascribed to you. Overall, I find Professor Palmenberg's investigation to be quite thorough and complete.

My conclusions regarding each allegation are explained below. Although Professor Palmenberg concluded that the fourth and sixth allegations were "not confirmed," I have determined that her

factual findings related to other five allegations demonstrates a serious and prolonged failure to meet your obligations as a faculty member.

Charge #1: Whether you have engaged in behavior that could be described as “unwelcome... pervasive or severe enough that a reasonable person would find it hostile and/or intimidating and that does not further the University’s academic or operational interests” and/or “is unacceptable to the extent that it makes the conditions for work inhospitable and impairs another person’s ability to carry out his/her responsibilities to the University” in violation of Faculty Legislation II-332, Part I.

Professor Palmenberg concluded that this charge is confirmed. Her report includes detailed evidence of hostile behavior toward [REDACTED] including reported physically aggressive behavior for which you received a letter from your department chair directing you to [REDACTED] and a letter from the dean of the College of Agricultural and Life Sciences warning you that the alleged physical contact is unacceptable behavior (Ex 17). The investigative report also includes findings regarding the experience of [REDACTED] and detailed testimony from [REDACTED] that further substantiates this charge (Ex 15).

In her summary of witness responses to interview questions, Professor Palmenberg found responses to the questions as follows:

“1. In your own interactions with Dr. Brunet, have you ever been the subject of unwelcome, hostile or intimidating behavior?”

Yes = 21x

No = 16x

“2. Have you ever witnessed or been made aware of unwelcome, hostile or intimidating behavior by Dr. Brunet towards others?”

Yes = 31x

No = 4x

(other) = “intimidating only”, “no comment”

In summarizing the evidence regarding this charge, Professor Palmenberg wrote, “From her first student, continuing through to [REDACTED] the majority of reviewed evidence supports a theme of ongoing behavior instances considered bullying or hostile by subordinate students and employees.... This is supported not only in the consistency of their difficult stories, but that collectively their histories support a similar pattern of alleged hostile or tense relationships, a lack of empathy, and pervasive, unwarranted behavior” (pages 8-9).

Charge #2: Whether your behavior evidences an “abuse of authority, such as using threats or retaliation in the exercise of authority, supervision, or guidance...” in violation of Faculty Legislation II-332, Part I.

Professor Palmenberg concluded that this charge is confirmed. Evidence in support of this charge includes a pattern of making it difficult for students to finish their academic work, including giving extra work while [REDACTED] are trying to [REDACTED] refusing to review drafts of chapters and papers being prepared for submissions to journals, and changing expectations for what research needed to be completed (Exs 03, 04, 06). While faculty members

may be expected to direct research projects for which they are the primary investigator, the evidence presented documents behavior that was retaliatory and purposefully disrespectful and demeaning in situations for which you were not the primary investigator, such as the work of [REDACTED] who were hired to conduct field research for you apart from their own research projects (Exs 04, 15).

In her report, Professor Palmenberg wrote,

"I consider Dr. Brunet's authorship changes disingenuous. They were done at late stages, without informing co-authors, or by adding/removing names without consultation at other stages of publication. This behavior is not in the spirit or intention of stated USAD/ARS authorship ethics or by any accepted scientific or professional ones. Rather it supports allegations (11 witnesses mentioned this point) that authorship allocation by Dr. Brunet is often (and demonstrably) wielded as a retaliatory tool (Ch#3)" (pg 15).

Charge #3: Whether your behavior has included "abusive expression... directed at another person in the workplace, such as derogatory remarks or epithets that are outside the range of commonly accepted forms of disagreement, disapproval, or critique in academic culture and professional setting that respects free expression" in violation of Faculty Legislation II-332, Part I.

Professor Palmenberg concluded that this charge is confirmed. Evidence of behavior of this nature is found, among other places, in Mr. Weisse's report (Ex 03), his notes from his interviews (Ex 06), in chairperson Paskewitz's notes (Ex 04), and in the testimony provided by [REDACTED] (Ex 15).

Charge #4: Whether you have engaged in discrimination or discriminatory harassment, including but not limited to conduct that adversely affects any aspect of an individual's employment, education, or activities, or has the effect of denying equal treatment to an individual on the basis of an individual's protected status, in violation of Regent Policy 14-6;

Professor Palmenberg concluded that this charge is not confirmed. She found that you "employed or recruited personnel with an exemplary proportion of both gender balance and minorities", and that your "personal support in providing opportunities for minorities was genuinely appreciated" (page 6). In summarizing her findings regarding this charge, Professor Palmenberg wrote, "Although some targets of unacceptable behavior clearly believe bias contributed to their interactions with Dr. Brunet, such allegations are not universally supported as a general pattern of behavior" (page 6).

Charge #5: Whether you have violated FPP Chapter 8.02, section B -- the obligation of faculty members "to maintain professional honesty and integrity" -- through disrespect of personal boundaries and workspace, and/or making demeaning and insulting comments in public settings or any other conduct.

Professor Palmenberg concluded that this charge is confirmed. The description of physical assaults and unwanted physical contacts involving [REDACTED] (pg 8), [REDACTED] and [REDACTED] (Ex 03) evidence a failure to maintain personal boundaries and constitute a violation of FPP 8.02. As additional evidence in support of this finding, in the notes

provided by Mr. Weisse and verified by Professor Palmenberg, there is evidence that you directed [REDACTED] to "lie on [REDACTED] timesheet" and that you subsequently "yelled at [REDACTED] for telling someone about the timesheets" (Ex 06, pg 11).

Charge #6: Whether you have failed to maintain standards of professionalism, honesty, and integrity through a violation of the terms of any letter of expectation issued to you by your chair;

Professor Palmenberg concluded that this charge also is not confirmed. In this case, Professor Palmenberg found that a letter was drafted but never formally issued to you by department chair Susan Paskewitz in 2017. Therefore, you "cannot be held accountable for implied reprimands that were configured but never sent" (page 7).

Despite the two unconfirmed charges describe above, I find significant, convincing and disturbing evidence that the remaining five charges have been substantiated. I have based my decision on the following:

Charge #7: Whether, through the conduct alleged in this letter, you have engaged in conduct that adversely affects your performance of your responsibilities to the university as defined in FPP 9.02 and 9.03.

Professor Palmenberg concluded that this charge is confirmed. All of the evidence cited above for the confirmed charges demonstrate your failure to perform your responsibilities as a faculty member. In her report, Professor Palmenberg wrote,

"The majority of previous academic personnel (grad students & postdocs) and previous USDA personnel who have worked under the auspices of Dr. Brunet, even from the beginning of her hire, report that her behavior towards them, or witnessed by them, was unacceptable to the extent that it made conditions for their work inhospitable and/or impaired their ability to carry out their educational and professional goals. The frequent decisions to leave or move sideways are personal responses to what was generally perceived and reported as an ongoing unsupportive environment. Supports Ch#1, Ch#2, Ch#3, Ch#5, Chr#7" (pg 12).

As one specific example that speaks to this charge, Professor Palmenberg's report includes a description of a specific situation with [REDACTED] in [REDACTED] in which you appeared to have become angry about the fact that suggestions were made by other instructors that the wording of questions you submitted for the students' final exam be changed. According to the report, you withdrew from the class effective immediately, which resulted in your not participating in proctoring or grading the exams. Professor Palmenberg's findings assert,

"Both witnesses strongly and credibly asserted that Dr. Brunet's abrupt withdrawal and consequent shift of the remaining course workload to TAs and other instructors, was intended as punitive retaliation (Ch#2) in direct response to changes in her (draft) exam questions. Her precipitous withdrawal is an example of conduct that adversely affected the performance of her responsibilities to the university (Ch#7)" (pg 10).

Finally, as further evidence of negative impact of your behavior, it is noted that since you joined the faculty in 2003, "of (your) 8 UW students, none have graduated (yet) with a PhD under (your) supervision" (pg 11).

I have taken into consideration your version of the circumstances surrounding these events. I have reviewed your written response to Professor Palmenberg's questions. I recognize you acknowledge your demeanor as sometimes stern and demanding, and I am aware that you characterize it as a "no-nonsense approach to your research" (pg 5).

Regarding overall credibility, however, I find Professor Palmenberg's assessment of the credibility of your assertions and recollection of your behavior and situations to be well-evidenced and fair. She cites several examples of situations and statements you have made that appear to be contrary to the material evidence and witness testimony (pgs 9-10).

Conclusion:

I have concluded, based on my review of the materials attached to the complaint submitted by CALS Dean Kathryn VandenBosch and the investigation and exhibits that just cause exists for you dismissal from your zero-dollar faculty appointment pursuant to FPP 9.03.

My review of the totality of the findings and evidence suggests that your behaviors crossed the line of acceptable behavior on many occasions, and you have failed to maintain professional honesty and integrity in your work with your students and employees. Your behavior has had a significantly negative impact on a number of graduate students and scholars who looked to you as a mentor, advisor and instructor.

Before formally invoking dismissal, pursuant to FPP 9.06C(3), I invite you to participate in voluntary and confidential settlement discussions. If you choose to accept this invitation, please contact my office (262-1304) on or before Friday, August 17, 2018. If you do not accept this invitation to engage in voluntary and confidential settlement negotiations by Friday, August 17, 2018, I will move forward to issue a final decision. At that time, you will have the right to appeal these charges of dismissal. Such an appeal would lead to a hearing conducted by the UW-Madison Committee on Faculty Rights and Responsibilities (CFRR) in accordance with FPP 9.07-9.09.

Sincerely,



Sarah C. Mangelsdorf

Provost and Vice Chancellor for Academic Affairs

xc: Kathryn VandenBosch, Dean, CALS

Attachments (also to be provided via Box folder):

Report of Investigation by Prof. Ann Palmenberg, with Exhibits
Chapter 4 of UWS, Wisconsin Administrative Code
Chapter 9 of Faculty Policies and Procedures

FACULTY POLICIES AND PROCEDURES

UNIVERSITY OF WISCONSIN-MADISON

As approved by the Faculty Senate on 15 May 1978 with subsequent amendments as of 17 May 2016

CHAPTER 9: DISCIPLINE AND DISMISSAL OF FACULTY FOR CAUSE

9.01. PREAMBLE.

The university has a tradition of commitment to professional honesty and integrity, as described in FPP Chapter 8, and also recognizes the need for fair and adequate investigation of alleged violations of rules and policies relating to faculty conduct. The unified rules and procedures contained herein shall apply in faculty disciplinary and dismissal proceedings, within the framework established in sections UWS 4 and UWS 6 of the Wisconsin Administrative Code. Faculty members charged with actions which could lead to discipline or dismissal (see 9.02. and 9.03. below) are entitled throughout the proceedings to due process both by tradition and by law. The principles of due process as understood traditionally by the faculty and delineated herein (FPP 9.06., 9.08., as well as in UWS 4) include, but are not limited to: knowledge in writing of the full complaint and its source(s), access to all documentation, the right to be present at all hearings and the right to confront and cross examine, the right to be represented, the right to refrain from testimony without prejudice, appropriate appeal processes, closed hearings if desired, written findings of fact, and verbatim records of all hearings. While this chapter provides the formal structure for proceeding in disciplinary and dismissal cases, many cases will be resolved by agreement among the parties involved or by formal mediation. In cases involving alleged scholarly misconduct, the rules and procedures are those set forth in Faculty Document 867a, which is presented in the faculty legislation appended to Faculty Policies and Procedures.

9.02. CAUSE FOR DISCIPLINE.

No faculty member shall be subject to discipline except for just cause, based upon a determination that the faculty member has violated a university rule or policy or has engaged in conduct which adversely affects the faculty member's performance of his/her responsibilities to the university but which is not serious enough to warrant dismissal. As used in this chapter, discipline means any sanction except dismissal imposed by the administration against a faculty member for misconduct, including but not limited to an official reprimand, reduction in salary or reduction of a departmentally recommended increase in salary, or reduction in rank.

9.03. CAUSE FOR DISMISSAL. (See UWS 4.01.)

No faculty member shall be subject to dismissal except for just cause, based upon a determination that the faculty member's conduct directly and substantially affects adversely, to a degree greater than that reserved for disciplinary action, the ability to carry out satisfactorily his/her responsibilities to the university. Examples of conduct that may warrant dismissal include, but are not limited to, fraud or intentional misrepresentation of facts for personal benefit, gross abuse of authority or influence (e.g., discriminatory or retaliatory actions, particularly where a pattern is evident), or willful and protracted violations of university rules or policies. Layoff and termination for reasons of financial emergency are not dismissals for cause, and such actions are taken pursuant to Chapter 10 of these rules.

9.04. COMPLAINTS ABOUT FACULTY MEMBERS.

Complaints against faculty members alleging facts which, if true, might constitute adequate cause for discipline under UWS 6 or dismissal under UWS 4 shall be in writing and shall be filed with the vice chancellor for academic affairs and provost (provost).

9.05. ACTION BY PROVOST ON COMPLAINTS.

- A. On receiving a complaint concerning a faculty member, the provost shall determine whether the complaint deals with scholarly misconduct and/or other misconduct.
- B. Complaints alleging scholarly misconduct shall be dealt with according to Faculty Document 867a and FPP 9.14. A formal allegation of misconduct in scholarly research will be referred to the chair of the department (or functional equivalent) or to the corresponding academic dean or, in the case of conflict of interest on the part of the chair or academic dean, to the Vice Chancellor for Research and Graduate Education.
- C. If the complaint alleges misconduct other than scholarly misconduct, the provost shall determine whether a prima facie case exists for the imposition of discipline or for dismissal. The provost shall also consider the timeliness of the complaint, particularly in light of related state and federal limitations statutes. As used in this section, a prima facie case for discipline exists whenever the information submitted in support of the complaint would warrant disciplinary action, if considered on its face to be true and not subject to refutation or exculpatory explanation. A prima facie case for dismissal exists whenever this standard is met, but with the additional requirement that the information submitted in support of the complaint be of such substantial character that the magnitude of the alleged conduct warrants contemplation of dismissal if determined to be true. If a prima facie case does not exist or if the complaint is not considered timely, the complaint shall be dismissed.
- D. Whenever the provost receives a complaint against a faculty member which he/she deems substantial and which, if true, might lead to dismissal under UWS 4, the provost shall proceed under UWS 4 and the provisions of this chapter of FPP.

9.06. INVESTIGATION AND FURTHER ACTION.

- A. If the provost determines that a prima facie case exists for imposition of discipline or dismissal and the case is timely, he/she shall institute an investigation by appointing an investigator or investigators of his/her choosing. The provost shall also offer to discuss the matter with the faculty member concerned, giving the faculty member an opportunity to speak to the matter, and shall provide the faculty member with a written statement of the matter(s) to be investigated. The faculty member shall also receive a copy of the original signed complaint, subject to the possible need to redact information pertaining to third parties that will not be considered part of the investigation. The faculty member concerned shall have the right to be advised and represented by counsel or other representative at his/her expense throughout the investigation and thereafter.

B. The faculty member can state objections to the provost's selection of investigator(s). The investigator(s) shall investigate the complaint as soon as practicable and provide an oral and/or written report to the provost. Following the investigation the provost shall consult with recent past chairs of the University Committee and the Committee on Faculty Rights and Responsibilities who shall advise the provost as to the actions that should be taken as enumerated in C. below.

C. Actions that the provost may take are:

1. Dismiss the case; or
2. Refer the complaint to the department(s) or the equivalent functional unit(s) in which the faculty member concerned holds membership if the investigation indicates that the case involves a matter which should be resolved at the departmental level and in which disciplinary action by the provost is not warranted; or
3. Prepare to invoke an appropriate disciplinary action. In doing so, the provost will present the faculty member with a written summary of all evidence obtained both for and against each charge brought forward for disciplinary action or dismissal. The provost shall then invite the faculty member to participate in voluntary and confidential settlement negotiations which could involve, with agreement of both parties, formal mediation.

If formal mediation is invoked, the parties shall agree on the appointment of a mediator or mediators. Formal mediation must be completed within 30 days of the appointment of the mediator(s), unless both parties agree to an extension of no more than 30 days. At any time, either party may withdraw from the mediation process.
4. If settlement is not achieved by negotiation or mediation, invoke appropriate discipline or dismissal. When the provost invokes either discipline or dismissal, he/she shall provide the faculty member with a copy of any investigatory report produced and a copy of any written recommendation as provided above. The provost shall also inform the faculty member of his/her right to appeal to the Committee on Faculty Rights and Responsibilities (CFRR).

9.07. COMMITTEE ON FACULTY RIGHTS AND RESPONSIBILITIES.

A. When a faculty member appeals a disciplinary action to the committee, the committee shall:

1. Conduct fact-finding hearings if requested by the faculty member or by the provost or if deemed necessary by the committee;
2. Make recommendations to the chancellor concerning the validity of the appeal.

B. When a faculty member appeals dismissal, the committee shall under UWS 4.03 serve as the standing committee to hear and act on the case, except for cases involving allegations of misconduct in scholarly research in which the Hearing Committee on Misconduct in Scholarly Research shall be the standing committee, under Faculty Document 867a.

9.08. CFRR HEARINGS.

When CFRR is holding a fact-finding hearing in a discipline case or is acting as a hearing body in a dismissal case, it shall operate as provided in UWS 4.05 and 4.06. Additionally, the faculty member shall have a right to:

- A. service of notice of hearing with specific charges in writing at least twenty days prior to the hearing;
- B. notification of the name(s) of the complainant(s);
- C. be heard by all bodies passing judgment or making recommendations;
- D. refrain from testifying without such omission being used as formal evidence of guilt; and
- E. a stenographic record of all hearings and transcripts thereof at no cost to him/her.

9.09. FINDINGS BY CFRR.

- A. A finding of just cause for the imposition of discipline or just cause for dismissal must be based on clear and convincing evidence in the hearing record.
- B. A finding by the committee of just cause for discipline or just cause for dismissal requires a majority vote with not more than two dissenting votes. Otherwise, the committee shall report that just cause for discipline or just cause for dismissal has not been established. The vote shall be reported in every case.

9.10. SUSPENSION.

The faculty committee to be consulted by the chancellor in considering suspension under UWS 4.09 is the University Committee.

9.11. TRANSMITTAL OF CFRR FINDINGS IN DISCIPLINE CASES.

- A. CFRR shall transmit its findings of fact and recommendations in discipline cases in writing to the chancellor, with copies to the provost, to the faculty member involved, and to the complainant within ten days of the conclusion of its proceedings.
- B. Within ten days of the transmittal of the committee's findings and recommendations to the chancellor, the faculty member concerned or the original complainant may file written objections with the chancellor.
- C. The chancellor shall, as soon as practicable after the expiration of this ten-day period, render his/her decision and transmit such decision to the committee, the provost, the faculty member concerned, the original complainant, and the University Committee.

9.12. CFRR TRANSMITTAL OF FINDINGS IN DISMISSAL CASES.

CFRR shall transmit its findings of fact and recommendations in dismissal cases in accordance with UWS 4.07.

9.13. NO FURTHER JEOPARDY.

Following recommendations of CFRR and a decision by the chancellor, or following action by the provost if the committee is not involved, the faculty member concerned shall not be subject again under these rules to the same charges arising from the original complaint.

9.14. PROCEDURES WHEN MISCONDUCT IN SCHOLARLY RESEARCH IS ALLEGED.

Whenever the provost acting pursuant to Faculty Document 867a (2/4/91) has decided to bring charges that would warrant discipline or dismissal of a faculty member on the basis of misconduct in scholarly research, sections 9.01. through 9.05.B., 9.10., and 9.13. of this chapter, as well as other sections specifically noted below, shall govern faculty dismissal and disciplinary actions as follows:

- A. The report of the Inquiry Committee provided for in Faculty Document 867a (2/4/91), Part II.B.5-7, shall constitute the investigation required by 9.06.A. and the complaint referred to in 9.01. and 9.04. After reviewing the report of Inquiry Committee and the response, if any, of the faculty member, if the provost believes that dismissal may be warranted, the provost shall proceed in accordance with UWS 4, or, if the provost believes that lesser discipline may be warranted, the provost shall proceed in accordance with 9.06.C.3. or 9.06.C.4., and UWS 6.01. If the provost decides to dismiss the case, he/she shall proceed in accordance with 9.06.C.1. Hearings subsequent to the provost's actions shall be conducted by the Hearing Committee on Misconduct in Scholarly Research under Faculty Document 867a, Part IIIA and may be appealed to CFRR, as provided below and in Faculty Document 867a, Part IIIB.
- B. The Hearing Committee on Misconduct in Scholarly Research provided for in Part III.A.1 of Faculty Document 867a shall consist of three to five members, a majority of whom shall be UW-Madison faculty members. The chair, who shall be a law-trained UW-Madison faculty member, and one additional UW-Madison faculty member shall be appointed for two-year terms. Other members shall be experts in areas germane to the scholarly misconduct allegations in question, and any member who does not come from the UW-Madison faculty shall be a tenured faculty member at an institution of higher education in the United States. All members shall be selected by the provost after consultation with the University Committee.
- C. The Hearing Committee shall proceed in accordance with the provisions of UWS 4.04-4.06 and Faculty Document 867a, Part IIIA. and E. In order to make a finding of misconduct in scholarly research, the committee must be satisfied that there is clear and convincing evidence of such misconduct.
- D. Within 10 days after receipt of the Hearing Committee's report, the faculty member may appeal to CFRR by giving written notice of the appeal to the chair of CFRR.
 1. CFRR shall review the record made before the Hearing Committee, but shall not receive any new evidence. CFRR may ask members of the Hearing Committee to explain matters within their expertise, and the faculty member is entitled to be present when any such explanation is given and to ask pertinent questions. Within ten days after giving notice of appeal, the faculty member may submit written arguments to CFRR. CFRR will hear oral argument if the faculty member or the Hearing Committee requests it.

2. The action of the Hearing Committee shall be affirmed unless CFRR determines (a) that the Hearing Committee's factual findings are clearly erroneous, or (b) that the committee erred in applying the law and that this error influenced the committee's decision, or (c) that the recommended sanction is inappropriate. In determining whether a factual finding is clearly erroneous, the question to be answered by CFRR is not whether it would have reached the same conclusion as the Hearing Committee but, rather, whether reasonable people could have considered the findings to have been supported by clear and convincing evidence. Similarly, the criterion for reviewing the sanction shall be whether reasonable people could consider it appropriate under the circumstances of the case. If CFRR finds error as defined above, it will recommend to the chancellor actions to remedy the error. If CFRR finds an inappropriate sanction was recommended, it will recommend a different sanction.
 3. If the Hearing Committee decision is appealed to CFRR, CFRR shall formulate a written decision and transmit it to the chancellor and the faculty member within ten days after the conclusion of its proceedings. Within ten days thereafter, the faculty member may file objections with the chancellor.
- E. If no appeal is taken to CFRR from the Hearing Committee decision, the faculty member may file objections with the chancellor within ten days after receipt of the Hearing Committee's report.
- F. Procedures thereafter shall be according to UWS 4.07-4.10 or UWS 6.01.

History: 9.05 approved by Fac doc 2615 on 2016-05-17

Chapter UWS 4

PROCEDURES FOR DISMISSAL

UWS 4.01 Dismissal for cause.
 UWS 4.015 Definitions.
 UWS 4.02 Responsibility for charges.
 UWS 4.03 Standing faculty committee.
 UWS 4.04 Hearing.
 UWS 4.05 Adequate due process.

UWS 4.06 Procedural guarantees.
 UWS 4.07 Recommendations: to the chancellor: to the regents.
 UWS 4.08 Board review.
 UWS 4.09 Suspension from duties.
 UWS 4.10 Date of dismissal.

UWS 4.01 Dismissal for cause. (1) Any faculty member having tenure may be dismissed only by the board and only for just cause and only after due notice and hearing. Any faculty member having a probationary appointment may be dismissed prior to the end of his/her term of appointment only by the board and only for just cause and only after due notice and hearing. A decision not to renew a probationary appointment or not to grant tenure does not constitute a dismissal.

(2) A faculty member is entitled to enjoy and exercise all the rights and privileges of a United States citizen, and the rights and privileges of academic freedom as they are generally understood in the academic community. This policy shall be observed in determining whether or not just cause for dismissal exists. The burden of proof of the existence of just cause for a dismissal is on the administration.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75.

UWS 4.015 Definitions. The following terms shall have the meaning given below:

(1) "Clear and convincing evidence" means information that would persuade a reasonable person to have a firm belief that a proposition is more likely true than not true. It is a higher standard of proof than "preponderance of the evidence."

(2) "Complainant" means any individual who is reported to have been subjected to sexual harassment, sexual assault, dating violence, domestic violence, or stalking as defined in subs. (5), (6), (9), (10), and (11).

(3) "Complaint" means an allegation against a faculty member reported to an appropriate university official.

(4) "Consult" or "consulting" means thoroughly reviewing and discussing the relevant facts and discretionary issues.

(5) "Dating violence" means violence committed by an employee against another person with whom they are in a "dating relationship" as defined in s. 813.12 (1) (ag), Stats.

(6) "Domestic violence" means conduct defined as "domestic abuse" in ss. 813.12 (1) (am) and 968.075, Stats.

(7) "Preponderance of the evidence" means information that would persuade a reasonable person that a proposition is more probably true than not. It is a lower standard of proof than "clear and convincing evidence."

(8) "Reporting Party" means one or more individuals or groups filing a complaint as defined in sub. (3). A reporting party may also be a complainant as defined in sub. (2).

(9) "Sexual harassment" means conduct defined in s. 111.32, Stats.

(10) "Sexual assault" means conduct defined in s. 940.225, Stats.

(11) "Stalking" means conduct defined in s. 940.32, Stats.

History: CR 15-061: cr. Register June 2016 No. 726, eff. 7-1-16; correction in (2) and (8) under 35.17, Stats., Register June 2016 No. 726.

UWS 4.02 Responsibility for charges. (1) Whenever the chancellor of an institution within the University of Wisconsin system receives a complaint against a faculty member which he

or she deems substantial and which, if true, might lead to dismissal under s. UWS 4.01, the chancellor, or designee, shall within a reasonable time initiate an investigation and shall, prior to reaching a decision on filing charges, offer to discuss the matter informally with the faculty member. For complaints of sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the chancellor, or designee, shall appoint the Title IX Coordinator, or designee, to initiate an investigation in accordance with applicable policies. The chancellor, or designee, shall also offer to discuss the matter informally with the complainant, and provide information regarding rights under this chapter. Both the faculty member and the complainant shall have the right to be accompanied by an advisor of their choice at any meeting or proceeding that is part of the institutional disciplinary process. A faculty member may be dismissed only after receipt of a written statement of specific charges from the chancellor as the chief administrative officer of the institution and, if a hearing is requested by the faculty member, in accordance with the provisions of this chapter. If the faculty member does not request a hearing, action shall proceed along normal administrative lines but the provisions of ss. UWS 4.02, 4.09, and 4.10 shall still apply.

(2) Any formal statement of specific charges for dismissal sent to a faculty member shall be accompanied by a statement of the appeal procedures available to the faculty member.

(3) The statement of charges shall be served personally, by electronic means, or by certified mail, return receipt requested. If such service cannot be made within 20 days, service shall be accomplished by first class mail and by publication as if the statement of charges were a summons and the provisions of s. 801.11 (1) (c), Stats., were applicable. Such service by mailing and publication shall be effective as of the first insertion of the notice of statement of charges in the newspaper. If the statement of charges includes sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the statement shall be provided to the complainant upon request, except as may be precluded by applicable state or federal law.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75; correction in (3) made under s. 13.93 (2m) (b) 7., Stats., Register, June, 1995, No. 474; 2015 Wis. Act 330 ss. 6, 20: am. (1), (3) Register April 2016 No. 724, eff. 5-1-16; CR 15-061: am. (1), (3) Register June 2016 No. 726, eff. 7-1-16; merger of (3) treatments by 2015 Wis. Act 330 and CR 11-061 made under s. 13.92 (4) (bm) Register September 2016 No. 729.

UWS 4.03 Standing faculty committee. The faculty of each institution shall provide a standing committee charged with hearing dismissal cases and making recommendations under this chapter. This standing faculty committee shall operate as the hearing agent for the board pursuant to s. 227.46 (4), Stats., and conduct the hearing, make a verbatim record of the hearing, prepare a summary of the evidence and transmit such record and summary along with its recommended findings of law and decision to the board according to s. UWS 4.07.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75; correction made under s. 13.93 (2m) (b) 7., Stats., Register, June, 1995, No. 474; correction made under s. 13.93 (2m) (b) 7., Stats., Register May 2007 No. 617.

UWS 4.04 Hearing. If the faculty member requests a hearing within 20 days of notice of the statement of charges (25 days if notice is by first class mail and publication), such a hearing shall be held not later than 20 days after the request except that this time limit may be enlarged by mutual written consent of the parties, or by order of the hearing committee. The request for a hearing shall be addressed in writing to the chairperson of the standing faculty committee created under s. [UWS 4.03](#).

History: Cr. [Register, January, 1975, No. 229](#), eff. 2-1-75.

UWS 4.05 Adequate due process. (1) A fair hearing for a faculty member whose dismissal is sought under s. [UWS 4.01](#) shall include the following:

- (a) Service of written notice of hearing on the specific charges at least 10 days prior to the hearing;
- (b) A right to the names of witnesses and of access to documentary evidence upon the basis of which dismissal is sought;
- (c) A right to be heard in his/her defense;
- (d) A right to an advisor, counsel, or other representatives, and to offer witnesses;
- (e) A right to confront and cross-examine adverse witnesses. If the complaint involves sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the hearing committee may reasonably restrict the faculty member or the complainant from questioning each other;
- (f) A verbatim record of all hearings, which might be a sound recording, provided at no cost;
- (g) Written findings of fact and decision based on the hearing record;
- (h) Admissibility of evidence governed by s. [227.45 \(1\)](#) to [\(4\)](#), Stats.

(2) If the complaint involves sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the complainant shall have all the rights provided to the faculty member in sub. [\(1\) \(a\)](#) to [\(h\)](#), except as may be precluded by applicable state or federal law.

History: Cr. [Register, January, 1975, No. 229](#), eff. 2-1-75; correction in [\(1\) \(h\)](#) made under s. [13.93 \(2m\) \(b\) 7.](#), Stats., [Register, June, 1995, No. 474](#); correction in [\(1\) \(h\)](#) made under s. [13.93 \(2m\) \(b\) 7.](#), Stats., [Register May 2007 No. 617](#); [CR 15-061](#): am. [\(1\) \(d\)](#), [\(e\)](#), cr. [\(2\) Register June 2016 No. 726](#), eff. 7-1-16; correction in [\(2\)](#) under [35.17](#), Stats., [Register June 2016 No. 726](#).

UWS 4.06 Procedural guarantees. (1) Any hearing held shall comply with the requirements set forth in s. [UWS 4.05](#). The following requirements shall also be observed:

- (a) The burden of proof of the existence of just cause is on the administration or its representatives;
- (am) For complaints involving sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the standard of proof shall be a preponderance of the evidence;
- (b) No faculty member who participated in the investigation of allegations leading to the filing of a statement of charges, or in the filing of a statement of charges, or who is a material witness shall be qualified to sit on the committee in that case;
- (c) The hearing shall be closed unless the faculty member under charges requests an open hearing, in which case it shall be open (see subch. [V](#) of ch. 19, Stats., Open Meeting Law);
- (d) The faculty hearing committee may, on motion of either party, and, if the complaint involves sexual harassment, sexual assault, dating violence, domestic violence, or stalking, on the motion of the complainant, disqualify any one of its members for cause by a majority vote. If one or more of the faculty hearing committee members disqualify themselves or are disqualified, the remaining members may select a number of other members of the faculty equal to the number who have been disqualified to serve, except that alternative methods of replacement may be specified in the rules and procedures adopted by the faculty establishing the standing committee under s. [UWS 4.03](#);

(e) The faculty hearing committee shall not be bound by common law or statutory rules of evidence and may admit evidence having reasonable probative value but shall exclude immaterial, irrelevant, or unduly repetitious testimony, and shall give effect to recognized legal privileges;

(f) If the faculty hearing committee requests, the chancellor shall provide legal counsel after consulting with the committee concerning its wishes in this regard. The function of legal counsel shall be to advise the committee, consult with them on legal matters, and such other responsibilities as shall be determined by the committee within the provisions of the rules and procedures adopted by the faculty of the institution in establishing the standing faculty committee under s. [UWS 4.03](#);

(g) If a proceeding on charges against a faculty member not holding tenure is not concluded before the faculty member's appointment would expire, he/she may elect that such proceeding be carried to a final decision. Unless he/she so elects in writing, the proceeding shall be discontinued at the expiration of the appointment;

(h) If a faculty member whose dismissal is sought has requested a hearing, discontinuance of the proceeding by the institution is deemed a withdrawal of charges and a finding that the charges were without merit;

(i) Nothing in this section shall prevent the settlement of cases by mutual agreement between the administration and the faculty member, with board approval, at any time prior to a final decision by the board;

(j) Adjournment shall be granted to enable the parties, including the complainant, to investigate evidence as to which a valid claim of surprise is made.

History: Cr. [Register, January, 1975, No. 229](#), eff. 2-1-75; correction in [\(1\) \(c\)](#) made under s. [13.93 \(2m\) \(b\) 7.](#), Stats., [Register, April, 2001, No. 544](#); [CR 15-061](#): cr. [\(1\) \(am\)](#), am. [\(1\) \(d\)](#), [\(i\)](#), [\(j\)](#) [Register June 2016 No. 726](#), eff. 7-1-16.

UWS 4.07 Recommendations: to the chancellor: to the regents. (1) The faculty hearing committee shall send to the chancellor and to the faculty member concerned, as soon as practicable after conclusion of the hearing, a verbatim record of the testimony and a copy of its report, findings, and recommendations. The committee may determine that while adequate cause for discipline exists, some sanction less severe than dismissal is more appropriate. Within 20 days after receipt of this material the chancellor shall review it and afford the faculty member an opportunity to discuss it. The chancellor shall prepare a written recommendation within 20 days following the meeting with the faculty member, unless his/her proposed recommendation differs substantially from that of the committee. If the chancellor's proposed recommendations differ substantially from those of the faculty hearing committee, the chancellor shall promptly consult the faculty hearing committee and provide the committee with a reasonable opportunity for a written response prior to forwarding his/her recommendation. If the recommendation is for dismissal, the recommendation shall be submitted through the president of the system to the board. A copy of the faculty hearing committee's report and recommendations shall be forwarded through the president of the system to the board along with the chancellor's recommendation. A copy of the chancellor's recommendation shall also be sent to the faculty member concerned and to the faculty committee. For complaints involving sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the complainant shall have all rights provided to the faculty member in this paragraph, including the right to receive a copy of the chancellor's recommendation, except as may be precluded by applicable state or federal law.

(2) Disciplinary action other than dismissal may be taken by the chancellor, after affording the faculty member an opportunity to be heard on the record, except that, upon written request by the faculty member, such action shall be submitted as a

recommendation through the president to the board together with a copy of the faculty hearing committee's report and recommendation. For complaints involving sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the complainant shall have all the rights provided to the faculty member in this paragraph.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75; CR 15-061: am. Register June 2016 No. 726, eff. 7-1-16.

UWS 4.08 Board review. (1) If the chancellor recommends dismissal, the board shall review the record before the faculty hearing committee and provide an opportunity for filing exceptions to the recommendations of the hearing committee or chancellor, and for oral arguments, unless the board decides to drop the charges against the faculty member without a hearing or the faculty member elects to waive a hearing. This hearing shall be closed unless the faculty member requests an open hearing (see subch. V of ch. 19, Stats., Open Meeting Law). For complaints involving sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the complainant shall have the same opportunity for filing exceptions to the recommendations of the hearing committee or chancellor, and for oral arguments, as the faculty member.

(2) If, after the hearing, the board decides to take action different from the recommendation of the faculty hearing committee and/or the chancellor, then before taking final action the board shall consult with the faculty hearing committee and/or the chancellor, as appropriate.

(3) If a faculty member whose dismissal is sought does not request a hearing pursuant to s. UWS 4.04 the board shall take appropriate action upon receipt of the statement of charges and the recommendation of the chancellor.

(4) For complaints involving sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the faculty member and complainant shall be simultaneously notified of the board's final decision.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75; correction in (1) made under s. 13.93 (2m) (b) 7., Stats., Register, April, 2001, No. 544; CR 15-061: am. (1), cr. (4) Register June 2016 No. 726, eff. 7-1-16.

UWS 4.09 Suspension from duties. Pending the final decision as to his/her dismissal, the faculty member shall not normally be relieved of duties; but if, after consultation with appropriate faculty committees the chancellor finds that substantial harm to the institution may result if the faculty member is continued in his/her position, the faculty member may be relieved immediately of his/her duties, but his/her pay shall continue until the board makes its decision as to dismissal, unless the chancellor also makes the determinations set forth in s. UWS 7.06 (1) in which case the suspension from duties may be without pay and the procedures set forth in s. UWS 7.06 shall apply.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75; CR 06-078: am. Register May 2007 No. 617, eff. 7-1-07.

UWS 4.10 Date of dismissal. A decision by the board ordering dismissal shall specify the effective date of the dismissal.

History: Cr. Register, January, 1975, No. 229, eff. 2-1-75.

Report of Investigation

Submitted by: Dr. Ann Palmenberg, Roland Rueckert Professor of Biochemistry & Molecular Virology; Department of Biochemistry, and Institute of Molecular Virology, UW-Madison

July 3, 2018 **CONFIDENTIAL**

1. Facts of the Case

Employment Synopsis:

Dr. Johanne Brunet joined the UW-Madison faculty in 2003 as an Assistant Professor in the Department of Horticulture, CALS. In 2009, as per FPP 5.14, she requested an appointment transfer (100%) to the Department of Entomology (CALS), a procedure subsequently ratified by the Executive Committees of both departments and by (then) CALS Dean Molly Jahn. She received her tenure in 2010 and was promoted to Full Professor in 2016, within the Department of Entomology. She holds a zero-time faculty appointment in the Department of Zoology (L&S); is a faculty trainer in the Plant Breeding & Plant Genetics Program; and additionally has faculty affiliate status in the Department of Botany (L&S). Since beginning with the UW, Dr. Brunet has been employed by the USDA-ARS (Research Ecologist) with a 0\$ appointment at the UW.

Trigger point for this investigation:

[REDACTED] was a [REDACTED] in the [REDACTED] Dr. Brunet, from [REDACTED] until [REDACTED]. During that time [REDACTED] alleges an escalating series of hostile, intimidating and/or retaliatory behaviors by Dr. Brunet especially during the summer/fall of [REDACTED] as [REDACTED] was preparing to [REDACTED]. The key allegations are recorded in interview notes (Ex06) by CALS HR Director Mr. Ben Weisse ([REDACTED]) and by Entomology Department Chair, Dr. Susan Paskewitz, in the form of journal notes (Ex04), and by an accelerating series of e-mail threads (not in Exhibits, but available) attempting to set reconciliation meetings among participants, including faculty members of [REDACTED]. A discussion of these points (see: 3. Procedures, 4. Findings) is irrelevant to the fact that in on or about [REDACTED], Dr. Paskewitz, after a meeting with [REDACTED], reported, "[REDACTED] is [REDACTED] and [REDACTED] to me today because of [REDACTED] interactions [REDACTED], Professor Johanne Brunet." This and other e-mail threads to [REDACTED], Sara Pfatteicher (Associate Dean CALS), and Carol Hillmar (Associate Dean, CALS HR) led to the immediate redirection of [REDACTED] to [REDACTED] and also deeper involvement of CALS HR in attempts to understand the core issues and resolve the immediate stress on this student.

With the permission of the Chair and Graduate School Academic Affairs Committee, [REDACTED] Dr. Paskewitz for the [REDACTED]. On 10/5/[REDACTED], Dr. Brunet was informed of this by e-mail. (Note: [REDACTED] on [REDACTED] Dr. Paskewitz). On [REDACTED], Dr. Paskewitz suggested that [REDACTED] speak with Ben Weisse, then Director of CALS HR. During that interview (Ex06, [REDACTED]) Mr. Weisse took notes which allege a history of previous and ongoing bullying and retaliatory behavior by Dr. Brunet [REDACTED], and also against multiple other (named) members of the laboratory, past and present. Mr. Weisse subsequently reported, "On [REDACTED] I met with [REDACTED] who claimed that Dr. Johanne Brunet ('Brunet') has created a hostile work environment. After discussion Megan Dzyuba, Office of Human Resources, Workforce Relations Specialist, it was decided that I would lead an investigation into these claims." This statement was part of his "Investigative report in response to claims of Hostile Work Environment from [REDACTED]," send by Mr. Weisse (Ex03, 12/1/17) to Dick Straub (Senior Assoc. Dean, CALS), Dr. Paskewitz, and Patrick Sheehan (Office of Workforce Relations, Office of Human Resources). On 2/2/18, Kathryn VandenBosch (Dean & Director, CALS) wrote a letter to Provost Sarah Mangelsdorf (Ex02).

"I have reviewed the investigative report and ... , it is my opinion that (Dr. Brunet's) actions should warrant disciplinary action up to and including dismissal under Chapter 9."

The Provost concluded that the allegations should move to the next phase of the FPP 9 process.

2. Provost's Charge and Summary of the Findings

The Provost asked if I would serve as an impartial investigator and I was charged (Ex01) to determine:

- Ch#1. Whether Professor Brunet has engaged in behavior that could be described as "unwelcome . . . pervasive or severe enough that a reasonable person would find it hostile and/or intimidating and that does not further the University's academic or operational interests" and/or "is unacceptable to the extent that it makes the conditions for work inhospitable and impairs another person's ability to carry out his/her responsibilities to the university" in violation of Faculty Legislation II-332, Part I;
- Ch#2. Whether Professor Brunet's behavior evidences an "abuse of authority, such as using threats or retaliation in the exercise of authority, supervision, or guidance..." in violation of Faculty Legislation II-332, Part I;
- Ch#3. Whether Professor Brunet's behavior has included "abusive expression ... directed at another person in the workplace, such as derogatory remarks or epithets that are outside the range of commonly accepted forms of disagreement, disapproval, or critique in academic culture and professional setting that respects free expression" in violation of Faculty Legislation II-332, Part I;
- Ch#4. Whether Professor Brunet has engaged in discrimination or discriminatory harassment, including but not limited to conduct that adversely affects any aspect of an individual's employment, education, or activities, or has the effect of denying equal treatment to an individual on the basis of an individual's protected status, in violation of Regent Policy 14-6;
- Ch#5. Whether Professor Brunet has violated FPP Chapter 8.02, section B -- the obligation of faculty members "to maintain professional honesty and integrity" - through disrespect of personal boundaries and workspace, and/or making demeaning and insulting comments in public settings or any other conduct;
- Ch#6. Whether Professor Brunet has failed to maintain standards of professionalism, honesty, and integrity through a violation of the terms of any letter of expectation issued to Professor Brunet by her chair;
- Ch#7. Whether, through the conduct alleged in this letter, Professor Brunet has engaged in conduct that adversely affects her performance of her responsibilities to the university as defined in FPP 9.02 and 9.03.

The summary of my findings is below. Evidence supporting these findings are in Section 3&4&5, as is a description of the investigative procedures. The word "confirmed" means I found convincing evidence that the charge was true. The words "not confirmed" means I did not find such evidence, but not necessarily that I believe the charge to be untrue. In some cases there was conflicting evidence that precluded an unambiguous conclusion.

Findings as to Ch#1:

Confirmed

Findings as to Ch#2:

Confirmed

Findings as to Ch#3:

Confirmed

Findings as to Ch#4:

Not Confirmed

Findings as to Ch#5:

Confirmed

Findings as to Ch#6:

Not Confirmed

Findings as to Ch#7:

Confirmed

3. Investigative Procedure

Considered Evidence & Materials:

1. Provost investigation charge to me (Ex01, 3/18/18); including FPP 9; FPP 8; II-332 (Defining Language Describing Hostile and/or Intimidating Behavior).
2. Formal complaint by Dean VandenBosch to the Provost (Ex02, 2/2/18) requesting FPP 9.05 review. This included the workplace review report by CALS Dean's Office of Human Resources, namely "Investigative report in response to claims of Hostile Work Environment from [REDACTED]" (Ex03, [REDACTED]) by Mr. Ben Weisse, the current Asst. Dean for HR in L&S. In this report there are ~30 specific-instance allegations covering, "abusive expression", "unwarranted physical contact", abuse of authority", "related to race/nationality", "[REDACTED] of those affected."
3. To formulate his report (Ex03), Mr. Weisse interviewed 23 individuals, taking personal notes. Among these was Dr. Brunet (11/15/17). For that specific interview, he was accompanied by note taker. The notes from each interview (e.g. Ex06) were made available to me with the understanding I would respect witness confidentiality.
4. My interviews (30 face-to-face, 12 phone, 1 skype, 1 written questions) repeated those of Mr. Weisse for [REDACTED] ([REDACTED]), and the complete list of [REDACTED] and [REDACTED]. Additional witnesses, [REDACTED], [REDACTED] and [REDACTED] were contacted and interviewed. Only [REDACTED] declined, although [REDACTED] preferred to respond to questions in writing rather than orally. In total, information was obtained from [REDACTED] (2x), [REDACTED] (4x), [REDACTED] (18x), [REDACTED] (1x), [REDACTED] (1x), [REDACTED] (12x), [REDACTED] (6x), and Dr. Brunet.
5. Dr. Brunet was interviewed 3 times. The first meeting explained the anticipated investigation process. The second, at her request, clarified the purpose and results of the internal review by Mr. Weisse. I suggested her CV would help establish timelines and that an approximate listing of letters of recommendation on behalf of her personnel could be useful evidence of relationships (Ex09). She obliged with these quickly and additionally sent: i) a document outlining her mentor-mentee lab expectations, ii) questions she preferred I ask of Mr. Weisse's witnesses (Ex11, 3/21/18), iii) her reply to Mr. Weisse's November interview notes (Ex07, 11/28/17), iv) a point-by-point reply to Mr. Weisse's report (Ex12, 4/10/18), v) a repudiation of statements made in e-mails from Dr. Paskewitz (Ex13, 4/12/18), vi) a list of current/past lab members, undergraduates, and faculty/deans whom she suggested I contact (Ex08, 3/30/18), and vii) a letter to the Provost requesting a fair investigation (Ex10, 3/3/18). Combined, these included about 25 pages of personal rebuttal to the allegations and circumstances of the CALS report and current investigation. The third interview (6/15/18) occurred after Dr. Brunet had been given (5/22/18) a list of written questions arising from my investigation. She responded in writing (Ex14, 6/14/18). The subsequent interview was for the purpose of clarifying her answers.
6. Unsolicited (e-mail, or during interviews) letters of support on behalf of Dr. Brunet were received from 4 [REDACTED], 2 [REDACTED] and 5 outside members of the scientific community, related to Dr. Brunet's field. These are not included in Exhibits but can be made available, redacted, if needed.
7. An unsolicited outside witness statement was submitted by [REDACTED] in support of a specific alleged incident (Ex16). He and [REDACTED] also sent (unsolicited) copies of their signed testimony [REDACTED] taken as part of parallel, ongoing investigations (Ex15). These were considered here only in so far as they pertain to overlapping behavior allegations. Additional documents, in the form of extended e-mails, or previous e-mail threads, alleging authorship incidents were received (unsolicited) from [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. Some authorship information is in Ex18 but all can be made available, if needed.
8. The CALS dean's office and the Chairs of Entomology & Horticulture gave me paper and electronic files that included: ~400 e-mails (~100 separate threads); Dept. documentation on previous allegations and resolutions (~40 pages); a Chair's journal of relevant events (Ex04); tenure documents; faculty annual reports; student funding records. The e-mail threads covered attempts at internal conflict resolution or information clarification concerning Dr. Brunet and various personnel, especially with regard to [REDACTED]

██████████ and ██████████ grievance allegations. These are not included in Exhibits but can be made available, redacted, if needed.

9. The UW USDA director informed me of parallel behavior investigations but declined (as he was instructed by USDA) to share USDA documentation. However, as mentioned in #7, ██████████ ██████████ gave me a signed transcripts of ██████████, covering much of the same materials as Mr. Weisse's interviews.

Investigative process:

After receiving the Provost charge, I contacted Mr. Weisse, Dean Straub (& Carol Hillmar), and Chairs Susan Paskewitz and Irwin Goldwin to schedule interviews and arrange for a transfer of documents/ e-mails they might have relevant to the investigation. Those materials (#2, #3, #8 above) were received and considered, defining (many of) the participants and their (potential) participation in this investigation.

Dr. Brunet was contacted. There is a letter on file with CALS from her (then) attorney requesting only questions in writing (Ex19), but she agreed to 2 initial interviews to discuss the parameters of the current investigation and to answer her questions about Mr. Weisse's procedures. During those meetings, she was asked for a CV, for a list of letters of reference she might have written for current/past lab members and for other materials she wished to have considered. Within a short time, everything in #5 was received and read. Included was a list of her recommendations for interviewees. A third interview was conducted near the end of my investigation. Dr. Brunet received a list of questions relating to the collected testimony, which I thought relevant to a consideration of the charges. She submitted written answers (Ex14). The oral session provided additional clarification. Note takers representing UW HR (Ms. Juliana Schmitz) and Dr. Brunet (Mr. Jerry Cooperstein) were present.

Mr. Weisse interviewed 23 people. That roster included ██████████ (██████████), Entomology Chair Dr. Susan Paskewitz, and Dr. Brunet. To protect witness confidentiality, Mr. Weisse assigned a witness identity (e.g. "W3") to each person. His report, interview notes, this report, and my notes, follow this system, extending the sequence for people I interviewed and he did not. Each witness was asked specifically about confidentiality. Almost unanimously they requested anonymity. Therefore, most referents here respect this system, except for ██████████, Dr. Brunet, and the Chairs of Entomology (Dr. Paskewitz), Horticulture (Dr. Irwin Goldman), or the local USDA Director/Research Leader (Dr. Phillip Simon) when they were speaking to me as administrative officials (as opposed to personal witnesses), or witnesses who allowed me to cite them with regard to select issues.

The interview process contacted people by e-mail, followed by face-to-face (30x), phone (12x) or skype (1x) conversations lasting 20-90 minutes. In total, not counting the above Chairs, USDA Leader, or UW administrators, there were 37 interviews with current/previous: ██████████ (8x), ██████████ (4x), ██████████ (6x), ██████████ (18x), ██████████ (1x), and ██████████ (1x). I declined to solicit interviews with ██████████ in the Brunet lab because these students are almost always supervised by more senior personnel. However, my roster did include ██████████, ██████████, and ██████████. Other than (previous) Dean Molly Jahn and the current Brunet undergraduates, these interviews completed Dr. Brunet's request list. The interviews followed a common format with notes recorded by me.

- Date/time/place for the interview
- Witness' relationship with Dr. Brunet (dates, position title, UW or USDA, current professional position).
- Preference (or not) for interview confidentiality. If "yes" person was then asked "why?"
- For interviews overlapping with Mr. Weisse's roster, individuals were asked point-by-point, about the contents of his notes. (His notes were my starting point so as not to overtly repeat previous testimony.) The possibility of edits, redaction, clarification or omission in these notes was offered for each quote, cited incident or documented observation. Individuals were then asked whether the overall tone and content of their transcript accurately reflected Mr. Weisse's full interview.
- Using terms from the Provost's charge(s) 7 questions were asked of each person.
 1. In your own interactions with Dr. Brunet, have you ever been the subject of unwelcome, hostile or intimidating behavior?
 2. In your own interactions with Dr. Brunet, have you ever been the subject of discriminatory or retaliatory behavior?
 3. Have you ever witnessed or been made aware of unwelcome, hostile or intimidating behavior by Dr. Brunet towards others?
 4. Have you ever witnessed or been made aware of discriminatory or intimidating behavior by Dr. Brunet towards others?

5. If behavior was towards you or witnessed by you, was this a 1-time instance or an ongoing pattern?
 6. How might you describe your current professional relationship with Dr. Brunet? Choose from: Cordial, Collegial, Defensive, I avoid contact, or No opportunity for contact? (Any alternative offering was recorded).
 7. In your current professional situation, would you feel comfortable asking Dr. Brunet for a letter of recommendation?
- Notes included offered comments, cited incidents, or other topics, ("Have you anything to add?")
 - Two faculty members (not from Mr. Weisse's roster) declined interviews but requested the above questionnaire. One then responded in writing, the other declined to reply.

4. Details of Findings

Themes and findings related to unconfirmed charges

Dr. Brunet's personal responses:

Dr. Brunet was interviewed by Mr. Weisse near the end of his discovery process (11/15/17). A note taker was present and subsequently produced a summary document (contained within Ex07) sent to Dr. Brunet. Along with the interview itself, this transcript was the basis for statements in Mr. Weisse's report attributed to Dr. Brunet. During my first interviews with Dr. Brunet, (3/16/16, 3/30/18) she said several times that she did not think Mr. Weisse's summary of the interview, nor his comments attributed to her in his final report were accurate. Dr. Brunet was clearly upset about this whole process and expressed to me a belief she was marginalized by the protocols and findings of the CALS report.

Dr. Brunet submitted Ex07, Ex10, Ex11, Ex12 and Ex13 to express her version of circumstances. The writings include objections/rebuttals to each allegation in the CALS report, her disagreement with the overall investigative process, and recommendations for the ongoing investigation, including preferred lines of questioning for my witnesses. Before our third interview (6/15/18) she submitted answers to my list of questions (Ex14) that arose either from generalities/confusion in her responses to the CALS report, or to other points originating in my investigation. These quotes embody her overall exculpatory themes:

(ans #35) *"I know that I strike people sometimes as being stern and demanding. That is part of my demeanor, perhaps. It is part of my no-nonsense approach to my research. But I am not unkind. I am concerned about my students. I wish they had been direct in their concerns because I would have addressed them. Please don't let my substantive good works become washed away by the allegations of a few. No one could withstand the kind of scrutiny that examines every bad day or unsatisfactory interaction they ever had."*

(ans #44) *"I again hope you will take into account the fact that there are many students who speak highly of me, that there are many past students with whom I stay in contact, who readily acknowledge the positive influence I have had on their careers. I have served on many graduate student committees over the years and have never heard complaints as to my interactions with students, quite the opposite... It appears that what I am facing here is a collection of allegations that arise from the same insular group. Obviously, those who complained are dissatisfied. Obviously they seek to hurt me. I regret that they feel that way. ... in some cases the people involved did not do good work and I am being targeted for my efforts to spur them to excellence. Sometimes, it seems to me that my direct style was perceived to be offensive when I meant no offence. I have tried to be strong in my denials where there is no truth to the allegations."*

(ans #23, regarding [REDACTED], Ex15) *"This document is filled with lies, distortions and misrepresentations of events and facts. There is very little that bears resemblance to reality. ... I hope you share my perspective that the comments of [REDACTED] demonstrate how completely committed [REDACTED] is to undermine my positions. [REDACTED] is willing to offer information for which [REDACTED] has no basis. This is truly regrettable. I do hope this investigation does not permit someone with such vile intentions to prevail."*

Finding: Dr. Brunet's full set of exhibits should be read in their entirety as an expression of her perspective, in her own language, entering the current investigation. With regard to Ch#1, Ch#2, Ch#3, Ch#5, Ch#7, the question becomes one of credibility. When does "stern and demanding" cross the line to "bullying and hostile" (see Weisse report below)? When does an "insular group" become the voice of all aggrieved? My overall findings(s) re these issues are furthered in 5. Discussion and Conclusions

Solicited and unsolicited support for Dr. Brunet:

This investigation deliberately included more principals than Mr. Weisse, so I could validate (or not) general themes of student, staff, and department faculty support. At Dr. Brunet's specific request, I included 5 [REDACTED], and a [REDACTED], all but 1 of whom [REDACTED] were previously interviewed by Mr. Weisse. These formed the core of witnesses expressing solid support for Dr. Brunet's professional mores as a faculty member. An additional [REDACTED], and 4 [REDACTED] stated their neutrality, which I construe as neither siding with, or refuting elements of the Provost's charges. Her strong supporters emphasized the following:

- These would (and did) agree that she has a strong personality that, "can sometimes be too blunt.. (and occasional) does not have a filter." [REDACTED].
- Through a series of unsolicited letters submitted as a result of a support campaign instigated by [REDACTED], 4 witnesses [REDACTED], 5 outside collaborators (not interviewed) and 2 undergraduates wrote of their uniformly positive experiences with Dr. Brunet. The witnesses reiterated in their interviews, that in their interactions she has been supportive of their work, encouraging, scientifically challenging, and for them, is a strong role model as a mentor. "The notion that Dr. Brunet creates a hostile work environment is ludicrous." [REDACTED].
- They also emphasized, that as personal witnesses to some recent alleged events [REDACTED], they believed stress may be experienced and expressed differently by different people, and from their viewpoint, descriptions of events told to me might have been exaggerated by the recipients to attract sympathy or deflect blame for personal shortcomings. This perspective holds Dr. Brunet is guiltless because "(allegations were) blown out or proportion or twisted. Others are simply not true."

Finding: Dr. Brunet's supporters are among ~1/3 of witnesses who have not seen, or report they were never subject to negative behavior. Some are [REDACTED] (presently) or among the handful (e.g. [REDACTED]) who's prior experiences at the UW were related as positive, educational, and advanced them professionally. Like Dr. Brunet, these supporters question the motivations and (sometimes the) emotional stability of those who made negative allegations. Again, the question of credence and the weight given to this testimony is furthered in 5. Discussion and Conclusions

Discriminatory behavior:

A few individuals [REDACTED] in their interviews alleged that their personal experiences of seeming hostility by Dr. Brunet were directed towards them because of perceived bias towards particular gender or minority status. The consequence of this behavior usually included reports of "being ostracized" or "ignored" or "marginalized" or even "demeaned" with regard to degree or optimal project progression (i.e. access to resources or informed guidance). A lack of equal treatment within the lab group was also alleged frequently by the witnesses as part of what they perceived as retaliatory conduct (see below). Others witnesses [REDACTED] volunteered conversations where the content or text could be considered discriminatory towards others.

On the other hand, it is also true that Dr. Brunet has employed or recruited personnel with an exemplary proportion of both gender balance and minorities. Some personnel, regardless of whether they were subject to or witnessed unacceptable behavior in another capacity, maintain that bias played no perceived role in those events. To the contrary, her personal support in providing opportunities for minorities was genuinely appreciated and cited [REDACTED]. Interview responses (below) to the questions of "discriminatory or retaliatory" behavior echo this theme when several people qualified their answers to deliberately separate these descriptors.

Finding: Although some targets of unacceptable behavior clearly believe bias contributed to their interactions with Dr. Brunet, such allegations are not universal or supported as a general pattern of behavior. Because of this, Ch#4 is not confirmed.

Response to formal letters of reprimand:

Mr. Weisse's report and my interviews with [REDACTED], Irwin Goldman (current chair of Horticulture), and CALS administrators (Dick Straub, Carol Hillmar), document the consequences of a [REDACTED] situation [REDACTED] and Dr. Brunet with findings that, "are serious and represent violence in the work place" (Ex17). At that time [REDACTED], [REDACTED] was [REDACTED] Dr. Brunet. After Horticulture and CALS preliminary investigation(s), into allegations of emotionally hostile and physically aggressive behavior (see Historical Precedents below), a letter of reprimand was sent to Dr. Brunet from Dennis Stimart (then Chair of Horticulture), dated [REDACTED]. Dr. Brunet refuted the allegations and meeting circumstances through a trail of

e-mail and letter exchanges (available if needed) with Dr. Stimart, variously from [REDACTED]. Because of his letter and the subsequent involvement of CALS, she eventually underwent [REDACTED]. On 1/2/08, Dr. Brunet was sent a summarizing letter from Molly Jahn (CALS Dean and Director). The essential text is cited.

"I am writing to confirm that, as an institution we must and have communicated clearly with you in writing that the alleged physical contact (re [REDACTED]) is unacceptable behavior. You and I have discussed this and I am confident that you understand the University's policies in this regard. Second, I am writing to confirm that there is disagreement between you and your Department Chair, Dennis Stimart, regarding the circumstances and the written record that relates to this event and its resolution. In view of this disagreement and the fact that no formal complaint has been received regarding this incident to date, the correspondence related to this incident will not become part of your permanent personnel file. Furthermore, we have agreed that any copy of Dennis's letter be maintained in the general departmental files and will be accompanied by your written comment already on record and this letter. With this letter, we consider the matter closed."

Finding. The above references are the only known chair/dean reprimands issued to Dr. Brunet. In July 2017, Chair Susan Paskewitz drafted a significant new letter to Dr. Brunet, recounting multiple allegations that had been brought to her with regard to [REDACTED] and [REDACTED] (among others, see Ex04), and stating "some behaviors that are not acceptable have been reported to me." CALS HR took this draft "under advisement" but it was not sent at that time to Dr. Brunet. She cannot be held accountable for implied reprimands that were configured but never sent. Therefore, Ch#6 is not confirmed.

Themes and findings related to confirmed charges

The CALS-initiated report by Mr. Weisse:

[REDACTED] and [REDACTED] reported experiences are only the most recent in a series of allegations and witness reports of individual-directed unacceptable behavior by Dr. Brunet as a supervisor of graduate students, postdocs, USDA technicians, or as a participating UW faculty member with responsibilities for teaching and collegial interactions with peers and colleagues. This statement offered by Mr. Weisse (Ex03) is an acceptable summary.

"There has been a general pattern of treatment among members of the Brunet lab throughout the years. When being recruited and when beginning in the lab, Dr. Brunet treats an individual very well. However, at some point – for some it is a matter of weeks while for others it is in a matter of a year – the individual has some type of negative encounter with Dr. Brunet which then affects the way Dr. Brunet treats them thereafter. This negative encounter appears to be when Dr. Brunet believes an individual has made a negative impact on her lab (?) financially or scientifically. Once this incident has occurred, individuals state that Dr. Brunet's treatment of them becomes hostile. This treatment has occurred with the majority of the people in her lab."

Every witness interviewed by Mr. Weisse was re-interviewed by phone, skype, or in person. With the exception of Dr. Brunet (see above), every person confirmed to me the full specifics of their previous testimony (positive or negative), including details of incidents that happened to them, were witnessed by them, or for which they are quoted in Mr. Weisse's extended notes, or in his final report (Ex03). Many added additional details or information. Some subsequently sent corroborative evidence (positive or negative statements, e-mail threads), and no witness contradicted, edited, disagreed or retracted any portion of his/her previous testimony. When asked specifically if Mr. Weisse's notes were a full and complete rendering of those interviews, every person except Dr. Brunet, indicated "yes."

Finding: The process of re-interviewing witnesses allowed me to hear each allegation summarized in Mr. Weisse's report directly from the people who made them, and to assess their individual credibility relative to Dr. Brunet's various repudiations of those allegations (Ex10, Ex14). I found the witness testimonies dovetailed with each other, with reports, findings and timelines, particularly those summarized by the Chair (Susan Paskewitz, Ex04) and were additionally supported by the extensive e-mail threads and department documents offered in evidence. I found no indication that any witness made up any stories or exaggerated incidences just to discredit Dr. Brunet. The negative experiences were real, truthfully recounted to me, and perceived to be personally injurious. I believe any reasonable person, listening to a similar testimony would find the balance of credibility to lie with these witnesses,

and particularly with the Dept. Chairs (Drs. Paskewitz and Goldman) and interviewed faculty, rather than with Dr. Brunet's oral and written disclaimers.

Finding: Mr. Weisse's report is an accurate summary of the information he collected during his discovery process. Fundamentally, the ~30 allegations, many of which involve other people in addition to [REDACTED], and which were chosen for that report, do cover much of what was said. For conciseness, there is no point in repeating each specific instance here. Ex03 and Ex06 should be read as a fully validated, credible exhibits for the current investigation. These materials if read or reviewed by any reasonable person, substantially confirm 5 of the Provost's charges (Ch#1, Ch#2, Ch#3, Ch#5, Ch#7). Additional incidents, allegations unique to the current investigation or which require expansion, are described below.

Key historical precedence:

1. [REDACTED] in the Dept of [REDACTED]. [REDACTED], in [REDACTED] made a series of allegations not dissimilar to those of [REDACTED], reporting hostile, as well as physically aggressive behavior, triggering [REDACTED], and [REDACTED] of Dr. Brunet. That situation was investigated at the Dept. and CALS levels only, and as a result, Dr. Brunet was directed [REDACTED] (by then Chair Dr. Stimart) to [REDACTED] (Ex17). This history is recounted here because, although further formal discipline was not pursued through FPP channels ("closed" refers exclusively to a lack of further discipline at that time), the situation records an ongoing behavior history.
 - [REDACTED] (repeated by [REDACTED]) stated [REDACTED] did not pursue formal charges at that time because, "(I) was ashamed and could not [REDACTED] with (Dr. Brunet)."
 - [REDACTED] because the situation [REDACTED]. When [REDACTED] tried to use the [REDACTED] years of research that was previously collected (Dr. Brunet) said it was USDA property and would not allow it. That [REDACTED] data was lost and [REDACTED].
 - Multiple witness accounts by faculty, students, USDA and postdocs (except Dr. Brunet) agree that Dr. Stimart and Dean Jahn's letters accurately reflect Dr. Brunet's culpability, hostility and retaliation against [REDACTED] for involvement in this incident. One specific e-mail thread between Dr. Stimart and Dean Jahn (12/27/ [REDACTED]) documents, "Johanne initially would not admit she had contact with ([REDACTED]), which eventually changed to admitting contact occurred."
 - [REDACTED] further relates, "[REDACTED] didn't seem to help." [REDACTED] states, "Dr. Brunet told ([REDACTED]) she was forced to [REDACTED] and that the instructor 'was an a**h***'."
 - [REDACTED] also states, "(Dr. Brunet said) 'I didn't know you couldn't touch someone.' 'I'll never forgive ([REDACTED]) for telling the chair about this.'"
 - The current Chair of [REDACTED], Dr. [REDACTED], [REDACTED]. He personally witnessed many aspects of this (then) student's allegations including testimony about the physically inappropriate behavior. He also described to me the personal stress inflicted on [REDACTED] by [REDACTED] challenging history with Dr. Brunet.
2. [REDACTED], had another particularly difficult [REDACTED].
 - As a result of Dr. Brunet's (perceived) intimidating behavior, this student became "terrified" to meet 1:1 and required [REDACTED] committee's or the Chair's interactions just to function. The last [REDACTED] of [REDACTED] degree program [REDACTED] instead of participating with Dr. Brunet.
 - Faculty members (e.g. [REDACTED]) and lab members ([REDACTED]) in their own testimony, recurrently brought up [REDACTED] extreme difficulties, confirming that frequent cutting comments to this student, or during committee meetings, were "part of Dr. Brunet's power structure", a continuous "assertion of bullying towards a particularly sensitive student."
 - Among these behaviors were significant delays alleged as "stonewalling" to sign off in [REDACTED] so [REDACTED] could [REDACTED] with [REDACTED]. Expectations changed continuously (as also alleged by [REDACTED]) with the perceived point being retaliation for [REDACTED] with Dr. Brunet.
 - Ex06 excerpts [REDACTED] testimony. Chair Susan Paskewitz and [REDACTED] confirmed to me the difficulties encounter by this student and their roles attempting mitigation and remediation. Ex04, the Chair's journal lists the historical chronology witnessed by Dr. Paskewitz in amelioration. Additional personal and professional consequences for this student, because of Dr. Brunet's behavior are outlined in "mentoring" and "mental health" sections below.

Finding. From her [REDACTED], continuing through to [REDACTED], the majority of reviewed evidence supports a theme of ongoing behavior instances considered bullying or hostile by subordinate students and

employees. The testimony commonalities regarding just these 3 students alleges Dr. Brunet “impaired” others (Ch#1), abused authority by not allowing a student to use (their) own research (Ch#2), made derogatory remarks (Ch#3) and disrespected personal boundaries (Ch#5). In my opinion any reasonable person listening to these witnesses, would find the students, their Dept. Chairs, faculty committee members, and lab members who were present, to be credible relative to Dr. Brunet’s accounts. This is supported not only in the consistency of their difficult stories, but that collectively their histories support a similar pattern of alleged hostile or tense relationships, a lack of empathy, and pervasive, unwarranted behavior.

Example of an event misrepresentation:

Brunet’s submitted materials were read and thoughtfully considered. In doing so, I found several statements which directly contradicted witnesses testimony, recorded-e-mail threads and departmental files, mentor committee recollections, e-mail documented timelines, and the obvious poor outcomes to careers and/or mental health reported by the internal review, or through my witness interviews. Necessarily, her writings summarize her point of view. Her tone, content and misrepresentation of events or conversations, in many cases, is less than consolatory, or without acknowledgment of the personal and professional difficulties reported by [REDACTED], or by faculty/staff who participated in reconciling the outcomes of those events. One example is cited here because it bears on the question of testimony credibility.

During his interview with Dr. Brunet (Ex07, 11/15/17) Mr. Weisse asked, “if she had any thoughts as to why these types of allegations would be made about her and the lab if they were untrue?” This is her written response.

“Dr. Brunet actually said she did not know. She indicated there was one person she could think of that was recently mad at her for asking [REDACTED] to leave the office in her laboratory where [REDACTED] was having a political meeting with people that were not permitted access to the building in the evening (it was around 7:00-7:30 pm). Dr. Brunet found [REDACTED] and two other unknown male individuals in the office in the back of the laboratory one evening returning from a WISE dinner. She asked them what they were doing and they indicated they were having a meeting about [REDACTED]. She indicated that this was not the place for such a meeting and politely asked them to leave the office. She escorted them to the first floor and then left the building. Dr. Brunet never said that this person was kicked out of her laboratory because [REDACTED] had a [REDACTED]. That person was politely asked to leave the office and was escorted out of the office by Dr. Brunet that evening.”

[REDACTED] ([REDACTED]) relates [REDACTED] was required to be in the lab on [REDACTED] to [REDACTED]. For timing convenience [REDACTED] invited 2 local attorneys in to discuss an outside project. Dr. Brunet, on her return, interjected herself in what was witnesses interpreted as an antagonistic act meant to embarrass [REDACTED] and make the environment inhospitable to any personal activities within her auspices. Within 2 days of this event, in what [REDACTED] alleges is retaliation for confronting her, Dr. Brunet denied funds to purchase a required reagent because “ [REDACTED] wasted money all the time.” Within the next two weeks, Dr. Brunet attempted to fire [REDACTED]. [REDACTED] and instead moved [REDACTED] to another lab. One of the attorneys wrote a personal account of the trigger confrontation, “...intended to memorialize my observations.” Ex16 (redacted) recounts that “(Dr. Brunet) was extremely displeased with having discovered the meeting and ordered everyone to leave immediately, escorting the whole party down the elevator while expressing her extreme displeasure with ([REDACTED]) for using lab space for “unauthorized persons.” [REDACTED] was very upset and attempted to de-escalate the situation and apologize for Dr. Brunet’s unsettling, aggressive confrontation. They continued their meeting in the building lobby. The witness account continues,

“The woman (Dr. Brunet) very curtly said that our being in the laboratory was completely inappropriate and it was apparent from her tone of voice, words, and body language that she was extremely displeased... (It) was puzzling and almost disturbing that she had taken such umbrage at what appeared, if anything, a minor transgression (i.e. sitting in the lab) and the anger and hostility that she displayed that evening. While most of her enmity was directed towards [REDACTED], as participants in the discourse (we) both commented after the encounter how much we were taken aback by her surprising conduct and manner. Her conduct in our presence could in no regard be considered cordial, civil or professional.... (we) have met several times with various (professors) who have graciously allowed us to meet (in their office space) to talk about [REDACTED]. Those meetings have all occurred without incident. The same, unfortunately could not be said about this encounter.”

Finding: This dichotomy between witness statements (“anger and hostility”) and Dr. Brunet’s account (“politely asked”) typifies many descriptions in the CALS report and my witness interviews for substantial event-specific allegations or observations of unwelcoming, demeaning behavior (Ch#1, Ch#2).

Note of specific correction: In Ex12, Dr. Brunet writes, “Dr. Palmenberg (..) confirmed to me that the sole purpose of the (CALS) investigation was to gather evidence that my laboratory presents a hostile work environment, etc.” This statement is a very distorted misrepresentation of our actual conversation. When asked by Dr. Brunet (2nd interview) why Mr. Weisse waited until the end of his investigation before interviewing her, I suggested he chose first to listen to those who might confirm or deny allegations before he could ask her about them. That she twisted my meaning so dramatically (Ex12) over a simple point of clarification, is an example contributing to my skepticism about her overall credibility, relative to witnesses with more substantial allegations.

Reported classroom incident:

████ & █████ recounted that Dr. Brunet █████ (previously █████) from █████. Under time constraints near the end of the semester (fall █████), team members edited Dr. Brunet’s submitted exam questions for continuity as was typical of this course. They state she emphatically rejected any changes in her text. On the Friday (████) before the Monday final exam during a required open review session with the full class of students, in what was described as “a very angry confrontational manner” she told the students “not to bother studying” because “she (herself) didn’t know what was on the exam.” Then she left, withdrawing from further participation in the required session. This behavior caused extreme anxiety in the class (~120 enrolled), among the 3 TAs, and other team members who were at a loss to explain this hostility. Later that day, Dr. Brunet sent an e-mail to course leaders, citing disrespect for her input without consultation (she had been variously out of town, but exam edits circulated by e-mail), and withdrew from the class effectively immediately. She did not participate in completing, proctoring or grading the exam, leaving the TAs and team members with many extra hours of her assigned work. “She just left us in the lurch.” The course directors were especially upset by the review session outburst, since teamwork as epitomized by the instructors’ behavior, was a theme of this course. Both witnesses report that prior to this incident, Dr. Brunet had been a full, active and welcome participant in █████, with an excellent, highly informative lecture style appreciated by the students. Afterwards, it was mutual that she would no longer participate. The e-mail threads documenting this incident are not included in Exhibits but can be made available, redacted, if needed.

Finding. Both witnesses strongly and credibly asserted that Dr. Brunet’s abrupt withdrawal and consequent shift of the remaining course work load to TAs and other instructors, was intended as punitive retaliation (Ch#2) in direct response to changes in her (draft) exam questions. Her precipitous withdrawal is an example of conduct that adversely affected the performance of her responsibilities to the university (Ch#7)

Witness responses to interview questions:

This investigation re-interviewed all of Mr. Weisse’s witnesses, additional previous Brunet lab members, the entire faculty of the Dept. of Entomology, and additional faculty/people identified by witnesses (or by Dr. Brunet) as having potentially relevant information. Part of the process was survey questions bearing on the Provost’s charges. Not all people answered all questions. The reported (other) language is volunteered by witnesses.

1. In your own interactions with Dr. Brunet, have you ever been the subject of unwelcome, hostile or intimidating behavior?
 - Yes = 21x
 - No = 16x
2. Have you ever witnessed or been made aware of unwelcome, hostile or intimidating behavior by Dr. Brunet towards others?
 - Yes = 31x
 - No = 4x
 - (other) = “intimidation only”, “no comment”
3. In your own interactions with Dr. Brunet, have you ever been the subject of discriminatory or retaliatory behavior?
 - Yes = 13x
 - No = 22x
 - (other) “(yes) retaliation only” = 2x

4. Have you ever witnessed or been made aware of discriminatory or retaliatory behavior by Dr. Brunet towards others?
 - Yes = 22x
 - No = 12x
 - (other) "(yes) retaliation only" = 3x
5. If behavior was towards you or witnessed by you, was this a 1-time instance or an ongoing pattern?
 - one time = 3x
 - ongoing pattern = 27x
6. How might you describe your current professional relationship with Dr. Brunet? Choose from:
 - Cordial = 8x
 - Collegial = 4x
 - Defensive = 1x
 - I avoid contact = 19x
 - No opportunity for contact = 3x
 - (other) = "awkward", "strained", "complicated"

Faculty and staff related various interactions, which while initially cordial, frequently turned rude once some trigger incident of critique, disagreement or authority challenge intervened in the relationship. The "I avoid contact" responses from a disturbing number of interviewees, or degree completion under a different mentor (see academic outcomes), were commonly reported as coping mechanisms to minimize additional experiences of unfriendly or perceived retaliatory behavior (e.g. authorship consequences, impediments to degree or research progress).

Finding. The majority of faculty, staff, student personnel within Dr. Brunet's current professional sphere report negative interactions with her at some point in their careers, fitting the definitions of the Provost's charges (Ch#1). Particularly disturbing are the multiple reports of perceived retaliation (hostile behavior, observed or personal), and consequent "I avoid contact" choices (Ch#2, Ch#7). About 30% of interviewed faculty/staff volunteered this selection.

Dr. Brunet academic mentoring outcomes:

Student service records for the Dept. of Entomology show that ~75% of admitted grad students enter the program seeking a PhD and the vast majority of these are successful. Almost none seek a terminal MS but ~50% of all students do complete a mid-career MS then continue their PhD with same mentor. A switch to different mentor or different program is highly exceptional (re: [REDACTED]). Since joining the faculty in 2003, of Dr. Brunet's 8 UW students, none have graduated (yet) with a PhD under her supervision. Named individuals gave permission to cite them in this context.

[REDACTED] (full roster of past/present were interviewed except 1 temporary "volunteer student")

- [REDACTED]. "I'm completely broken, sick, weakened and feeling worthless."
- [REDACTED] entered with intention of [REDACTED] but [REDACTED] and [REDACTED], "The stress levels were very high." [REDACTED] applied to and [REDACTED] because "I could not face the thought of another abusive mentor."
- [REDACTED] entered with intention of [REDACTED] then [REDACTED]. While generally supportive of Dr. Brunet [REDACTED] stated, "(I) wanted to leave before the relationship turned sour."
- [REDACTED] entered with intention of [REDACTED]. After [REDACTED] [REDACTED] "(Dr. Brunet is) not motivated by education." [REDACTED] because of negative working conditions."
- After a physical interaction for which Dr. Brunet was eventually reprimanded and forced by UW HR to undergo HR training (Ex17), [REDACTED] after [REDACTED] to [REDACTED]. (From: Ex06) "(I) hope something can be done about (Dr. Brunet). At a minimum, just put a flag out to potential students so they know."
- [REDACTED] entered with the expectation of [REDACTED]. [REDACTED] [REDACTED], completing the last semester in the lab [REDACTED] because "I was terrified of her. She was completely dismissive and I was too scared to talk to her or be alone with her." "(She told me) I was worthless and so was my work. No one would ever publish (your) paper." [REDACTED] and [REDACTED] intervened to [REDACTED], which although approved by the committee, was repeatedly delayed by [REDACTED]

Dr. Brunet (related by [REDACTED], [REDACTED], [REDACTED]). Then [REDACTED] ("I was completely burned out by her hostility.") despite offers from other faculty (e.g. [REDACTED]) to [REDACTED].

[REDACTED] (4 of 5 from full roster of past/present were interviewed)

- [REDACTED] joined Dr. Brunet as [REDACTED] for [REDACTED] with the expectation at the completion of that project [REDACTED]. After that time [REDACTED] because, "there was a complete lack of respect for me." "Her management approach was bad and hostile." "Micro-aggressions were perpetual." "There was a complete lack of communication. She wanted (the project) done without giving any directions or specifics." [REDACTED] is now [REDACTED].
- [REDACTED] stated, "(I) avoid her (but) never had personal problems."
- [REDACTED] after [REDACTED] as [REDACTED], [REDACTED] citing "(Dr. Brunet caused) severe persecution and sabotage of research materials and manuscripts." "The USDA would not intervene or help". "bad experiences". [REDACTED] alleges he [REDACTED] because Dr. Brunet refused to publish ([REDACTED] yrs of work) manuscripts and "buried (my) work." [REDACTED] (like [REDACTED]) alleges [REDACTED] has been rejected from multiple academic jobs because there are no papers documenting productivity from that period.

Presently, there are [REDACTED]. [REDACTED] entered in Sept [REDACTED] and [REDACTED] is [REDACTED] yrs into [REDACTED] ([REDACTED]). Both assert they are highly supportive of Dr. Brunet and her mentoring. This is also true for [REDACTED], the [REDACTED] (since [REDACTED]) who wrote, along with [REDACTED], unsolicited letters of support for Dr. Brunet, detailing their positive interactions with her and her mentoring style (listed in: Considered Evidence #6, above).

Dr. Brunet's CV, under "Mentoring" lists 7 graduate students including one from her experiences at Oregon State University. This version does not (yet) list the [REDACTED] here at the UW, a temporary "volunteer student (not interviewed), or [REDACTED] her [REDACTED] after entering the Dept. of Horticulture. As referenced above, [REDACTED] after Dr. Brunet became progressively less supportive and more belligerent towards [REDACTED] work, culminating in a documented physical incident.

Finding. The majority of previous academic personnel ([REDACTED]) and [REDACTED] who have worked under the auspices of Dr. Brunet, even from the beginning of her hire, report that her behavior towards them, or witnessed by them was unacceptable to the extent that it made conditions for their work inhospitable and/or impaired their ability to carry out their educational and professional goals. The frequent decisions to leave or move sideways are personal responses to what was generally perceived and reported as an ongoing unsupportive environment. Supports Ch#1, Ch#2, Ch#3, Ch#5, Ch#7.

Letters of recommendation:

In academics, requests for letters of recommendation are one indication of mutual trust and respect between mentors and mentees. Dr. Brunet was asked for a list of list of letters she has issued for individuals. Her list (Ex09) is considered non-confidential because the letter recipients are not identified. As part of my investigation, I asked all (past/present) [REDACTED] and [REDACTED], "Would you feel comfortable asking Dr. Brunet for a professional letter of reference?"

- Response "Yes" = 6x (2x [REDACTED], 2x [REDACTED], 2x [REDACTED]). Qualifiers: "Yes, without hesitation"
- Response "No" = 12x (6x [REDACTED], 2x [REDACTED], 4x [REDACTED]). Qualifiers: "Never. I don't believe she would be fair." "No, I would not trust what was in (a) letter." "No, I fear she would retaliate", "No, absolutely not!", "No, she would not be friendly to me", "Under no circumstances", "(I) would not be uncomfortable", "(I) would never ask. She would retaliate against me."

Of the students who responded "No", 5 appear on Dr. Brunet's list as having requested prior letters. When asked about this apparent contradiction, all 5 responded that prior letters were required during their tenure with Dr. Brunet, for (e.g.) [REDACTED] or meeting travel grants. They reiterated they would not now, since leaving the lab, request professional letters, citing the qualifiers above.

Note: this query about letters was not asked in faculty interviews. With respect to present/former USDA personnel, present/past supervisors are automatically included on promotion and continuation review boards. The USDA responses here pertain to people in current professional positions for which future letters might be required.

Finding: Fear of retaliation because of incidents witnessed or experienced while in the lab, was cited as influencing the decision of several previous academic personnel to not use Dr. Brunet as a future reference. This is a pattern since the beginning of Dr. Brunet's hire (Ch#2). Of the 6 "yes" responses, 4 were [REDACTED] (when questioned), 3 of whom were [REDACTED]. In no way do I question the credibility of any witnesses' strong, stated support for Dr. Brunet, but I observed this group to be highly motivated in defense of their [REDACTED].

Mental health outcomes consequent to Dr. Brunet's behavior:

The trigger point for Mr. Weisse's review was [REDACTED] interactions with Susan Paskewitz, and [REDACTED] subsequent direction to [REDACTED]. In interviews with Dr. Weisse, and me, and in a detailed report also submitted [REDACTED] (Ex15), [REDACTED] repeated allegations that [REDACTED] had [REDACTED] issues [REDACTED] because [REDACTED]. "After multiple individual incidents in the lab over the summer/fall of [REDACTED], [REDACTED] and [REDACTED], [REDACTED] was [REDACTED] and [REDACTED]. During [REDACTED] current employment, [REDACTED] has been under [REDACTED]. Other lab members allege that they too had significant negative health outcomes. As examples:

- [REDACTED] said the whole experience [REDACTED] as a result. [REDACTED] time with Dr. Brunet had an impact on health. [REDACTED]. At one point while in the lab, [REDACTED] was so demoralized and so hopeless [REDACTED] was witness). "(I) was [REDACTED], very [REDACTED]."
- [REDACTED] said stress level would become very high because [REDACTED] did not know what was expected with regard to project or specific work expectations. [REDACTED] due to high stress.
- [REDACTED] cited "[REDACTED]" and as a consequence has [REDACTED].
- [REDACTED], after leaving the lab [REDACTED] for [REDACTED] years, [REDACTED] for [REDACTED] months and [REDACTED] and [REDACTED]."
- [REDACTED] underwent more than a [REDACTED] after leaving the Brunet lab.

Finding. Inherently, faculty responsibilities include being a primary mentor and guidance provider for students and staff employees. A reasonable person, reviewing these repeated, similar allegations of workplace-induced stress, and consequent negative mental health outcomes would conclude that the environment engendered by Dr. Brunet was perceived as hostile and intimidating to the extent that it directly manifest into these consequences. There are no parameters of professionalism or mitigating circumstances that excuse Dr. Brunet's culpability in such outcomes. (Ch#1)

Academic authorship as (potential) retaliatory behavior:

The CALS investigation report alleged 4 incidents of authorship issues which were directly attributed by witnesses ([REDACTED]) to retaliatory behavior on the part of Dr. Brunet. Those issues/specifics were confirmed (to me) by these witnesses. In addition 3 people submitted new evidence (e-mail threads, specific manuscript information) supporting 2 previous and 2 more recent authorship issues. [REDACTED] ([REDACTED]), [REDACTED] and [REDACTED] gave permission to use their names in the context of these allegations.

1. Brunet, J., [REDACTED] and [REDACTED]. [REDACTED]
 - This manuscript during its initial submission, review and revision stages listed [REDACTED] as 1st author. At the final pre-publication stage, Dr. Brunet asked for author signoff "I have attached the publication agreement form. You do not need to sign anything but just agree that I can sign on your behalf" (email to [REDACTED], [REDACTED], available if needed). [REDACTED] and [REDACTED] both report that neither was consulted or informed that at some point in the publication process, Dr. Brunet changed herself to 1st author. They also report their belief that this behavior was "directly retaliatory" for [REDACTED] participation in a (then ongoing) scientific misconduct investigation.
 - Dr. Brunet, in her response to me relative to this alleged instance in the CALS report, stated (Ex12), "For the journals Dr. Brunet submits to, when a paper is submitted by an author, then this author gets the comments from the reviewers and deals with the journal. Dr. Brunet is not sure what this statement refers to as the person in question would have received the revisions and been in charge." In Ex14, (Qu39), she repeated this point, adding that this paper went through numerous iterations, submissions

and resubmissions to several journals before its acceptance. Dr. Brunet's contributions to the rewriting and refocus prior to submission to the final journal warranted the change in authorship at one of the late draft states.

2. [REDACTED] and J. Brunet. [REDACTED]

- In [REDACTED] and [REDACTED] (#1 above), [REDACTED] was a co-author on [REDACTED] of Dr. Brunet's peer-reviewed publications, and also a listed author on [REDACTED] scientific meeting abstracts ([REDACTED]). Ex18 documents [REDACTED] assertion that [REDACTED] was left off as co-author on this [REDACTED] paper as part of Dr. Brunet's retaliation for (among other incidents), supporting [REDACTED], in #1 above. Ex18 lists [REDACTED] contributions to this project. [REDACTED] further alleges (interview) that once she informed Dr. Brunet (summer of [REDACTED]) that [REDACTED] [REDACTED] was told directly that although promised otherwise previously, [REDACTED] would be consequently dropped from authorship on [REDACTED] pending manuscripts. This [REDACTED] paper is one of those. "This was clearly taken by me to mean that I was not going to be included as an author on other papers as retaliation." One of the remaining [REDACTED] (of [REDACTED]) papers is pending submission without [REDACTED] authorship (see #3 below). I did not follow up on the status of the [REDACTED] paper.
- Dr. Brunet, in her response to me (relative to this alleged instance in the CALS report), stated (Ex12), "Dr. Brunet is not permitted to put [REDACTED] on (a) manuscript unless they have done way more than simply collecting data. Every time she adds [REDACTED] a paper she needs to write a justification and get permission from the USDA-ARS. Collecting data is not considered a sufficient reason for putting [REDACTED] on a manuscript by USDA-ARS and is typically not accepted." She repeated this point (essentially) in her Ex14 response (Qu40), that is, [REDACTED] participation in data gathering did not warrant authorship inclusion.
- This statement by Dr. Brunet directly contradicts the spirit and language of ARS/ERS/NASS/NIFA Policies and Procedures: Authorship of Research and Technical Reports and Publications. "Any person who, in the judgement of the research leader, meets the guidelines for authorship and who wishes to be listed as an author cannot ethically be denied authorship." "The question of who should be an author is fundamentally an issue of science ethics." Phil Simon in supplying this document for review, added, "in my experience, these guidelines closely match the approaches to deciding authorship that the UW follows."

3. [REDACTED], [REDACTED], and J. Brunet ([REDACTED])
[REDACTED]; Manuscript in preparation.

- [REDACTED] alleges (via interview, manuscript draft and submitted e-mail thread), that Dr. Brunet recently removed [REDACTED] from authorship status on this pending manuscript. In an email exchange with him, Dr. Brunet wrote ([REDACTED]), "With respect to authorship, I work for the ARS so I cannot ignore their rules. I have to ask permission to put [REDACTED] on a manuscript and they will deny my request as they consider caring for plants and running samples not sufficient. You put [REDACTED] name on the draft without consulting me first, I never OKed it."

4. J. Brunet, [REDACTED], ([REDACTED]), [REDACTED], [REDACTED]
[REDACTED] Abstract submitted (available online) [REDACTED] conference.

- [REDACTED] alleges the work in #4 overlaps the pending manuscript #3. [REDACTED] was not consulted about using [REDACTED] name on this abstract. When informed of this, [REDACTED] contacted Dr. Brunet by e-mail ([REDACTED]), "First of all [REDACTED] should be a coauthor on this work. [REDACTED] did most of the work ... helped run some of the GC-MS and commented on an early version of a partial manuscript (i.e. #3 above) where [REDACTED] was listed as second author... I hope the authors as currently listed do not reflect how they will be listed on the publication."
- Dr. Brunet's response ([REDACTED]), "I am following ARS rules about co-authorship for [REDACTED]." Then subsequently ([REDACTED]), "... I decided to modify the BSA abstract to exclude any reference to floral scent. You are therefore no longer an author on the abstract/presentation."
- [REDACTED] and [REDACTED] both assert their removal as authors on #3 and #4 is "malicious retaliation" for questioning Dr. Brunet's authority on authorship and her decision to cite their unpublished work.
- Dr. Brunet alleges (Ex14, Qu42-43) that the work here (#4) is, or will be separate from #3 including [REDACTED] contributions. When she decided to remove [REDACTED] contributions from the abstract, she also removed [REDACTED] from authorship.

Finding: I consider Dr. Brunet's authorship changes disingenuous. They were done at late stages, without informing co-authors, or by adding/removing names without consultation at other stages of publication. This behavior is not in the spirit or intention of stated USAD/ARS authorship ethics or by any accepted scientific or professional ones. Rather it supports allegations (11 witnesses mentioned this point) that authorship allocation by Dr. Brunet is often (and demonstrably) wielded as a retaliatory tool (Ch#2).

USDA involvement:

Dr. Brunet has a 0\$ appointment at the UW, with 100% of her salary by the USDA. Research Leader, Professor Phillip Simon, Dept. of Horticulture is her direct supervisor. Since Dr. Brunet's hire (2003) multiple witnesses sought redress for their grievances (e.g. salary, publications, perceived misconduct, bullying, hostility, etc.) by contacting Dr. Simon. Their personal testimony and multiple e-mail threads show this to be true. The citations below are not comprehensive.

- [redacted] relates that [redacted] observed a particularly aggressive incident involving Dr. Brunet and [redacted], and sent an e-mail to Phil Simon asking what [redacted] could do. "Apparently Phil did nothing and [redacted] didn't (have recourse) to pursue this further."
- [redacted] also related, "Several lab members had talked (re Dr. Brunet behavior) to Phil Simon who is the research unit leader. Some had also talked to the previous USDA administrator. However nothing ever came out of these talks."
- [redacted]: "(Dr. Brunet) would get angry and yell at me. (I) told Phil Simon about this but nothing happened."
- [redacted] relates that [redacted] had a paper was submitted for publication. This paper was done using the research that [redacted] designed, collected data, computed result, and wrote. Apparently, when the journal came back as accepted but need revisions. (Dr. Brunet made) the revisions, changed the 1st authorship to herself, then re-submitted. (She) did not tell [redacted] about this (but then) was very angry. [redacted] contacted Phil Simon to ask what could be done about this. Phil simply replied back stating that "extraordinary proof would be required". [redacted] sent Phil another email with proof of what was done. Phil did not respond to this email. [redacted] did not pursue it above this as was unsure what else could be done. [redacted] thought: "What else could (I) do except go to JB's supervisor?"
- [redacted]: "(Dr. Brunet) was sabotaging my work and refusing to publish my papers. Phil Simon would not intervene or help (with this)." However, when Dr. Brunet subsequently tried to fire [redacted] before the end of [redacted], Dr. Simon did intervene and continue the appointment for the full term under his own supervision.

Dr. Simon was interviewed by me and confirmed that there are ongoing parallel USDA investigations regarding Dr. Brunet. He related that the USDA administration chooses not to share their information, witness statements or the status of their investigation findings with the UW at present.

Finding. Throughout the course of her employment at the UW, multiple lab personnel have sought redress from the USDA for alleged professional stress and career disruptions brought on by Dr. Brunet's behavior. Few if any of these instances have led to remedial discipline.

5. Discussion and Conclusions

From long experience as a UW faculty member, I know and respect what it takes to educate and support the people for whom we become responsible. The principles embodied by our employment, and as stated in II-332, means we do not dismiss, demean or impede careers even for those who may not continuously meet our personal expectations. After considering all the evidence, 3 context points became very clear.

1. Even if all people with personal contacts to Dr. Brunet were not injured or subject to unwelcoming behavior, it doesn't negate that some of them were. If "some" translates to "any" it has to be questioned why that happened.
2. II-332 says, "Unwelcome behavior pervasive or severe enough that a reasonable person would find it hostile and/or intimidating ... is unacceptable (if) it makes the conditions for work inhospitable and impairs (a) person's ability to carry out his/her responsibilities to the university." The perpetrator of behavior doesn't get to decide what a "reasonable person" would consider unwarranted, abusive, unacceptable or perceived retaliation. Whether reporting significant aggressions or just general incivility, arguments of context or perpetrator's intent do not mitigate that the recipient felt violated and reported this. Therefore, alleged

incidents if indeed they occurred, need to be taken at face value and given strong credence, especially if they support an ongoing pattern of repeated negative behavior. In this case, after evaluation of the facts, I find the recipients to be substantially credible in their assertions that Dr. Brunet's behavior was subjectively perceived as hostile and intimidating. Moreover, any reasonable person would also find it so.

3. Any instance of physical, emotional or professional harm is, by definition, unacceptable.

Face value in this investigation starts with the ~30 allegations cited in the CALS report. I found each of them to be true, confirmed to me by credible witnesses and supported by (in several instances) with newly submitted information. Alone, these would justify the 5 "**Confirmed**" findings to the Provost's charges. In support, I also summarize the following new evidence.

- 31 of 35 people questioned here reported that at some point in their interactions with Dr. Brunet they witnessed unwelcome, hostile or intimidating behavior. 21 of 37 people report they were themselves, subjects of this behavior.
- 22 of 34 people witnessed discrimination (8x) or retaliatory behavior (22x), of whom 13 reported they themselves were the subjects (primarily retaliation).
- 27 witnesses reported the above patterns as ongoing and as a consequence 19 of 35 "avoid contact" with Dr. Brunet in the context of their professional capacities. Only 12 reported "collegial" or "cordial" as ongoing interaction descriptors. 4 of these are [REDACTED].
- 12 of 18 [REDACTED] from the Brunet lab, stated categorically they would never, in their present career capacities, ask Dr. Brunet for a professional letter of recommendation. As cited above under "4. Findings" the most frequent given reason is fear of retaliation. The ongoing Brunet lab personnel represent the bulk of the positive responses.
- Among previous students, 6 either finished with a lesser degree than intended ([REDACTED]) or under the mentorship of a different faculty member ([REDACTED]). [REDACTED] of these then [REDACTED], attributing [REDACTED] directly to the negative behavior they experienced in the Brunet lab.
- Among previous [REDACTED], [REDACTED] as soon as they left the lab, again citing the negative behavior they experienced.
- Unwarranted authorship changes without agreement by co-authors, or usurping authorship inclusion and citation order, as alleged in findings, fits the definition of "unacceptable behavior" and should also be considered "abuse of authority". At least [REDACTED] witnesses allege this historical pattern of activity was retaliatory.
- The most disturbing findings in this investigation were first-person reports that at least [REDACTED] Brunet [REDACTED], blaming [REDACTED] and/or [REDACTED] as a result of her directed behavior. At least [REDACTED] more have sought, or are currently [REDACTED], again reported as a direct consequence of hostile behavior. That Dr. Brunet was "unaware" of this and "outraged" that her culpability is alleged (Ex12), or that she was unmindful these students were in distress, emphasizes the breakdown in mentor-mentee communication that should have been the foundation of such relationships. To a person, the subjects allege that Dr. Brunet knew well the severe and unwarranted stress she was engendering, and indeed they report that was the whole point of her behavior.
- My own interactions with Dr. Brunet (oral and written), supported by a thorough reading of her rebuttal cannon (Ex12, Ex14) observed several instances of unwarranted misrepresentation or uncivil demeanor. She maintains she has a strong personality and is frequently misunderstood. I believe her "strong" behavior recurrently crosses the line into "hostile." If directed perpetually or selectively at subordinates, her aggression, regardless of whether it was always deliberate, would lead to exactly the types of allegations charged by the witnesses. It would also lead to the widespread perception of bullying alleged by the majority of her Department. In my judgement, Dr. Brunet's stated defenses against any/all of the allegations arising from Mr. Weisse's investigation, or from mine, lack substantive credibility relative to accusing witnesses. Credence, in total, supports the allegations (Ch#1, Ch#2, Ch#3, Ch#5, Ch#7), not Dr. Brunet.

The above information, considered in its entirety, contributed to my conclusions.

6. Exhibits

- Ex01. ChargeToPalmenberg dated 3/14/18
- Ex02. CALStoProvost, dated 2/2/18.
- Ex03. WeissInvestigationReport, dated 21/1/17
- Ex04. PaskewitzJournal, 2016-17
- Ex06. InvestigativeNotes, Mr. Weisse, dated 11/18
- Ex07. BurnetToWeisse, ReHisInterview, dated 11/28/17
- Ex08. BrunetContactRequests, dated 3/30/18
- Ex09. BrunetToPalmenberg, LettersList, dated 3/30/18
- Ex10. BurnetToProvost, ReInvestigation, dated 3/13/18
- Ex11. BurnetToPalmenberg, WitnessQuestions, dated 3/21/18
- Ex12. BrunetToPalmenberg, WeisseRubuttal, dated 4/10/18
- Ex13. BurnetToPaskewitz, EmailRebuttal, dated 4/12/18
- Ex14. BrunetToPalmenberg, InvestigationQuestions, dated 6/14/18
- Ex15. ██████████ Statemen ██████████ -redacted, dated ██████████
- Ex16. WitnessToPalmenberg, dated ██████████
- Ex17. Chairs&DeanLetters, dated ██████████
- Ex18. ██████████ Allegations, dated ██████████
- Ex19. LetterfromKasietaLegalGroup, dated 11/20/██████████



March 14, 2018

VIA E-Mail

Re: FPP Chapter 9 Charge against Prof. Johanne Brunet

Dear Professor Palmenberg:

I received a complaint from Dean Kathryn VandenBosch against Professor Johanne Brunet pursuant to Chapter 9 of the UW-Madison Faculty Policies and Procedures (FPP), dated February 2, 2018. This complaint alleges that she has engaged in misconduct (other than scholarly misconduct) that could warrant discipline or dismissal from her faculty appointment at the University; specifically that she has engaged in behavior that violates university policies or rules, that she has engaged in conduct that adversely affects the performance of her responsibilities to the university as described in Chapter 8 and/or 9 of Faculty Policies and Procedures, and that her conduct with students in her lab has created a difficult work and learning environment in violation of the University's policies on hostile and intimidating behavior and discrimination.

A copy of the complaint letter from Dean VandenBosch accompanies this letter. Also enclosed is a copy of FPP Chapters 8 and 9, the University's Faculty Legislation "II-332 – Defining Language Describing Hostile and/or Intimidating Behavior" and the policy on Discrimination, Harassment, and Retaliation, Regent Policy Document 14-6. Finally, also enclosed is a copy of the notice letter provided to Professor Brunet.

I have concluded that the allegations concerning Professor Brunet's conduct with regard to her duties as a faculty member should move to the next phase in the FPP 9 process, which is an investigation. You have been selected to conduct the investigation into the allegations against Professor Brunet, as required in FPP 9.06A. As an impartial investigator, you are specifically charged to investigate the following:

1. Whether Professor Brunet has engaged in behavior that could be described as "unwelcome . . . pervasive or severe enough that a reasonable person would find it hostile and/or intimidating and that does not further the University's academic or operational interests" and/or "is unacceptable to the extent that it makes the conditions for work inhospitable and impairs another person's ability to carry out his/her responsibilities to the university" in violation of Faculty Legislation II-332, Part I;

Office of the Provost and Vice Chancellor for Academic Affairs

150 Bascom Hall University of Wisconsin-Madison 500 Lincoln Drive Madison, Wisconsin 53706
608/262-1304 Fax: 608/265-3324 E-mail: provost@provost.wisc.edu www.provost.wisc.edu

2. Whether Professor Brunet's behavior evidences an "abuse of authority, such as using threats or retaliation in the exercise of authority, supervision, or guidance..." in violation of Faculty Legislation II-332, Part I;
3. Whether Professor Brunet's behavior has included "abusive expression ... directed at another person in the workplace, such as derogatory remarks or epithets that are outside the range of commonly accepted forms of disagreement, disapproval, or critique in academic culture and professional setting that respects free expression" in violation of Faculty Legislation II-332, Part I;
4. Whether Professor Brunet has engaged in discrimination or discriminatory harassment, including but not limited to conduct that adversely affects any aspect of an individual's employment, education, or activities, or has the effect of denying equal treatment to an individual on the basis of an individual's protected status, in violation of Regent Policy 14-6;
5. Whether Professor Brunet has violated FPP Chapter 8.02, section B -- the obligation of faculty members "to maintain professional honesty and integrity" -- through disrespect of personal boundaries and workspace, and/or making demeaning and insulting comments in public settings or any other conduct;
6. Whether Professor Brunet has failed to maintain standards of professionalism, honesty, and integrity through a violation of the terms of any letter of expectation issued to Professor Brunet by her chair;
7. Whether, through the conduct alleged in this letter, Professor Brunet has engaged in conduct that adversely affects her performance of her responsibilities to the university as defined in FPP 9.02 and 9.03.

I have asked Professor Brunet to fully cooperate in this investigation in order to assure that all the facts relevant to these allegations are obtained. I have assured her that her conduct will not be prejudged and that she will have a full and fair opportunity to respond to all the allegations. I have also assured her that to the extent possible, the investigation will be conducted confidentially.

Please let me know if you have questions about the charge I have given to you.

Thank you in advance for conducting this investigation.

Sincerely,



Sarah C. Mangelsdorf
Provost and Vice Chancellor for Academic Affairs

Enclosures

cc: Professor Johanna Brunet, Dept. of Entomology
Dean Kathryn VandenBosch, College of Agricultural and Life Sciences
Susan Paskewitz, Chair, Dept. of Entomology
Kasieta Legal Group, LLC
Claire Dalle Molle, University Legal Counsel, Office of Legal Affairs
Michael Bernard-Donals, Vice Provost for Faculty and Staff



College of
Agricultural & Life Sciences
UNIVERSITY OF WISCONSIN-MADISON


Provost's Office
FEB 05 2018
UW-Madison


DATE: February 2, 2018

TO: Provost Sarah C. Mangelsdorf

FROM: Kathryn VandenBosch 
Dean and Director, College of Agricultural and Life Sciences

RE: Dr. Johanne Brunet referral to Provost for Investigation per Chapter 9 of the FPP

In accordance with Chapter 9.05 of Faculty Policies and Procedures (FPP), I am submitting a formal complaint for your review with regard to the professional behavior of Dr. Johanne Brunet, a Professor within the Department of Entomology in the College of Agricultural and Life Sciences. Professor Brunet is a Dr. Brunet is a \$0 tenured faculty member, whose paid appointment is with the U.S. Department of Agriculture, Agriculture Research Service (USDA-ARS). This fall CALS Human Resources received a claim, which was brought forward  that Dr. Brunet has created a hostile work environment for individuals in her research laboratory. An internal personnel review was conducted by the CALS Deans' Office of Human Resources. The investigative report from this extensive review documents a general pattern of treatment by Dr. Brunet toward members of the Brunet lab, causing a hostile work environment.

I have reviewed the investigative report and believe that it strongly supports a pattern of hostile and intimidating behavior. As defined in II-332: *Defining Language Describing Hostile and/or Intimidating Behavior*, the investigation suggests that Dr. Brunet "does not further the University's academic or operational interests to the extent that" the pattern of treatment "makes the conditions for work inhospitable and impairs another person's ability to carry out his/her responsibilities to the university." Further, the seriousness of situations raised in the investigation (e.g., ) elevate this matter to an extremely high level of concern. As such, it is my opinion that her actions should warrant disciplinary action up to and including dismissal under Chapter 9.

The enclosed report is submitted for your review and consideration of this request. Due to the serious nature of the pattern of behavior, and a report from her department that Dr. Brunet is currently recruiting new graduate students to her laboratory, I ask that this request be made a priority. I request would like to recommend to the Department of Entomology that they suspend Dr. Brunet's ability to accept new graduate students while this formal complaint process proceeds, and I request you support in this matter. I appreciate your attention to this matter.

Office of the Dean and Director

140 Agricultural Hall 1450 Linden Drive Madison, WI 53706
608-262-1251 Fax: 608-262-4556 www.cals.wisc.edu

To: Dick Straub, Senior Associate Dean, College of Agricultural & Life Sciences
Susan Paskewitz, Chair, Department of Entomology
Patrick Sheehan, Director, Office of Workforce Relations, Office of Human Resources

From: Ben Weisse, CALS HR Manager

RE: Investigative report in response to claims of Hostile Work Environment from [REDACTED]
[REDACTED]

Date: December 1, 2017

Introduction

On [REDACTED], I met with [REDACTED] (“[REDACTED]”), who claimed that Dr. Johanne Brunet (“Brunet”) has created a hostile work environment. After discussion Megan Dzyuba, Office of Human Resources, Workforce Relations Specialist, it was decided that I would lead an investigation into these claims.

Witnesses

In addition to [REDACTED], Twenty-three witnesses were sent requests for investigatory interviews. Of the twenty-three, four are [REDACTED] of the Brunet lab ([REDACTED] students, [REDACTED], and one [REDACTED]), twelve are [REDACTED] of the Brunet lab (including [REDACTED]), and nine are [REDACTED] or [REDACTED] [REDACTED] (two [REDACTED] Brunet lab members). Twenty-two of the twenty-three agreed to participate and did participate in the investigatory interview process. For purposes of this report, a witness number (W #) rather than the individual’s name is used to identify witnesses due to witness concerns about confidentiality, discretion, and potential retaliation. While witnesses were advised that confidentiality could not be guaranteed in every step of this process, the retaliation concerns were numerous and for that reason, a witness numbering system is sometimes utilized throughout this report in order to reduce the likelihood of retaliation. Finally, [REDACTED] and numerous other witnesses suggested names of individuals who may have information relevant to this investigation during their interviews with the investigator or subsequent to their interviews. Not all of the individuals who were suggested to have information were interviewed, as the investigator reviewed and determined who would be interviewed based upon scope and relevancy to the investigation.

Scope of Investigation

The scope of the investigation was to seek information either supporting or refuting claims of a hostile work environment in Dr. Brunet’s lab. In addition, if claims of discrimination arose, these would also be investigated or referred to the appropriate campus entity.

Not in scope were [REDACTED]. When incidents of [REDACTED] [REDACTED] were mentioned, these were forwarded to [REDACTED] and were not followed up on by CALS during this investigation.

Hostile Work Environment, Retaliation, and Hostile and Intimidating Behavior

The University defines and describes *retaliation*¹ as follows:

Retaliation is defined as adverse action taken against an individual in response to, motivated by or in connection with an individual's complaint of discrimination or discriminatory harassment, participation in an investigation of such complaint and/or opposition of discrimination or discriminatory harassment in the educational or workplace setting. Individuals making a complaint of discrimination or taking part in an investigation relating to discrimination or opposing discrimination are protected against retaliation.

The University defines and describes *hostile and intimidating behavior*² as follows:

Hostile and intimidating behavior is defined as unwelcome behavior pervasive or severe to the extent that it makes the conditions for work inhospitable and impairs another person's ability to carry out his/her responsibilities to the university, and that does not further the University's academic or operational interests. A person or a group can perpetrate this behavior. The person need not be more senior than or a supervisor to the target. Unacceptable behavior may include, but is not limited to:

1. Abusive expression (including spoken, written, recorded, visual, digital, or nonverbal, etc.) directed at another person in the workplace, such as derogatory remarks or epithets that are outside the range of commonly accepted expressions of disagreement, disapproval, or critique in an academic culture and professional setting that respects free expression;
2. Unwarranted physical contact or intimidating gestures; Conspicuous exclusion or isolation having the effect of harming another person's reputation in the workplace and hindering another person's work;
3. Sabotage of another person's work or impeding another person's capacity for academic expression, be it oral, written, or other;
4. Abuse of authority, such as using threats or retaliation in the exercise of authority, supervision, or guidance, or impeding another person from exercising shared governance rights, etc.

Repeated acts or a pattern of hostile and/or intimidating behaviors are of particular concern. A single act typically will not be sufficient to warrant discipline or dismissal, but an especially severe or egregious act may warrant either.

¹ <https://compliance.wisc.edu/eo-complaint/discrimination-harrassment-retaliation/> Last accessed 11.29.17

² <https://hr.wisc.edu/hib/principles-and-policies/> Last accessed 11.29.17

General Findings/Witness Themes

Since Dr. Brunet began as a faculty member at UW in 2003, her lab has consisted of a mix of graduate students, post-docs, and USDA technicians. There has been a general pattern of treatment among members of the Brunet lab throughout the years. When being recruited and when beginning in the lab, Dr. Brunet treats an individual very well. However, at some point – for some it is a matter of weeks while for others it is a matter of a year – the individual has some type of negative encounter with Dr. Brunet which then affects the way Dr. Brunet treats them thereafter. This negative encounter appears to be when Dr. Brunet believes an individual has made a negative impact on her lab (?) financially or scientifically. Once this incident has occurred, individuals state that Dr. Brunet's treatment of them becomes hostile. This treatment has occurred with the majority of the people in her lab. The following, which are broken down by major theme, are ways that Dr. Brunet has caused a hostile work environment:

Abusive expression:

- [REDACTED]: "Dr. Brunet said that the only reason I got into UW-Madison is because I am a minority."
- [REDACTED]: "Dr. Brunet said 'Your brother must be stupid.'" [REDACTED] all witnessed this.
- [REDACTED]: "On the way back from a conference I made a navigational error and for the entire 4 hour trip back Dr. Brunet kept belittling me, telling me that I am so bad at this. I felt trapped and couldn't get out of the situation."
- [REDACTED]: "Dr. Brunet would make rude comments about my accent." [REDACTED], and [REDACTED] witnessed comments similar to this.
- [REDACTED]: "When I had a committee meeting, Dr. Brunet was usually rude and would put me down in front of the committee." Dr. Brunet denied engaging in any abusive expression.

Unwarranted Physical Contact:

- [REDACTED]: "I didn't know what I was looking for and Dr. Brunet scolded me for this. She then physically slapped my hand; not hard, but enough to get my attention. It was emotional that she physically touched me in a negative way."
- [REDACTED]: "Dr. Brunet then grabbed my shoulders and shook me violently, screaming at me to pay attention."
- Dr. Brunet denied engaging in any unwarranted physical contact.

Abuse of authority:

- Pattern of making it difficult for student to finish program:
 - Funding related:
 - [REDACTED]: "In [REDACTED] of the last year of my program, while attending a conference, Dr. Brunet out of the blue told me that she would not have money to pay me in the fall. I protested, stating that I had already [REDACTED] [REDACTED] and that I needed the money and also the health insurance. She

said that perhaps she could find funding for job on the USDA side, but I would need to work for it and it would not include insurance.”

- [REDACTED]: “In the summer months, after finishing a position [REDACTED], Dr. Brunet would put us on [REDACTED] for the summer. While [REDACTED] that last summer, at the end of the month I did not receive a stipend. When I sent an email to Dr. Brunet that I did not receive my stipend, she simply replied back, ‘correct.’ When I replied back stating that I did not understand, she simply replied back with ‘I guess we have a misunderstanding.’”
- Dr. Brunet stated that she did not improperly stop funding students.
- Giving extra work when [REDACTED]:
 - [REDACTED]: “When I started [REDACTED] last year, Dr. Brunet gave me many hours of work not related [REDACTED] so I hardly had time to work on my own project. I was working 40 or more hours per week on her projects so it was very difficult to get [REDACTED].”
 - [REDACTED]: “Near the end of my program, Dr. Brunet gave me a large amount of work not related [REDACTED]. I was working about 90 hours a week. when I went to Dr. Brunet to voice my concern that I was being overworked and not given enough time to work on my paper, she simply replied ‘Good. That’s how you should be feeling.’”
 - [REDACTED]: “During the summers she would have us work in the field observing bees 40-50 hours per week. I had very little time to do my own research.”
 - Dr. Brunet denied giving extra work when students were [REDACTED].
- Refuse to review papers:
 - [REDACTED]: “When I finally found time to write the first two chapters [REDACTED], I sent them to Dr. Brunet to review. She said that I should get it to someone else to review as she didn’t have time. I begged her to review as she was the one that really knew what I was working on. She said she was too busy.”
 - [REDACTED]: “When I had written part [REDACTED], I would ask Dr. Brunet to review it. Dr. Brunet would reply back that she didn’t have time to read the paper.”
 - Dr. Brunet denied that she refused to review students’ papers.
- Changed expectations:
 - [REDACTED]: “I wrote two chapters [REDACTED]. Dr. Brunet decide to have these two chapters published, so she worked with me to get them published. After submitting these for publication, I sent them to [REDACTED]. However, Dr. Brunet sent an email [REDACTED] stating that [REDACTED] could not submit those chapters [REDACTED].”
 - [REDACTED]: “Dr. Brunet was constantly changing her expectation of what research was needed. I would finish an experiment and think it was enough, but Dr. Brunet would state that I needed more... in the end, after

calling my committee to discuss, my committee agreed with me so I was able to finish my degree.”

- Dr. Brunet stated that if her expectations changed it was to drop expectations. She denied adding additional expectations.
- Authorship issues:
 - [REDACTED]: “I conducted research and collected data on a research project and was promised 1st authorship. When the paper was submitted, I was not put as first author and was not told of this.”
 - [REDACTED]: “After conducting research, collecting data, computing result and writing a paper, I submitted it for publication. After I left the lab, it came back as accepted but needing revisions. Dr. Brunet made revisions and changed authorship to herself and did not tell me about this change in authorship.” [REDACTED] witnessed this.
 - [REDACTED]: “After an incident with Dr. Brunet, she told me “I will be very selective with whom I put on papers.’ Dr. Brunet then left me off of the authorship of all papers even though I had contributed to the research of them.”
 - [REDACTED]: “After finishing [REDACTED], even though Dr. Brunet stated that my research was not very good, she told me I should work on getting it published, then stated ‘Just to be clear, it will be me who will submit this paper.’”
 - Dr. Brunet stated that authorship could be changed if a major re-write occurred; however, she stated she has not done this at UW. Dr. Brunet stated that she follows Ag Research Services (ARS) rules on authorship, stating that one needed to be included if a person provided at least 2 of the following: Design, Information gathering, Analysis, paper-writing.
- Threat to not pay people what was promised or earned:
 - [REDACTED]: “[REDACTED] attended a trip with a lab member. When it was time for them to get paid for their time, Dr. Brunet refused to pay. [REDACTED] student’s mom came to Madison and needed to talk to a few people in order for Dr. Brunet to pay them.”
 - [REDACTED]: “I planned a research trip and had the trip approved by Dr. Brunet. After the trip, I submitted everything to get reimbursed, but Dr. Brunet did not approve everything. I ended up paying about \$800 out of my own pocket.”
- Asking those under her to lie on their timesheet:
 - [REDACTED]: “Dr. Brunet asked if I would go to 100%. When I said I would, she told me to not put the extra hours on my timesheet. Rather, I should just bank these hours and put them on my timesheet when I was not working.”
 - Dr. Brunet stated that the only time she asked someone to lie on a timesheet was to add time to a timesheet for work spent [REDACTED] instead of spent doing ARS work.

Related to race/nationality:

- [REDACTED]: “Dr. Brunet would make rude comments about my accent.” [REDACTED], and [REDACTED] witnessed comments similar to this.

- [REDACTED]: “When [REDACTED], while attending a lab meeting, I told the lab members that my brother stayed in his house. Dr. Brunet said ‘Your brother must be stupid.’ [REDACTED] all witnessed this.
- [REDACTED]: “When selecting grad students, Dr. Brunet [REDACTED] because [REDACTED] and if there was a problem, I wouldn’t be able to trust her to tell me.”
- [REDACTED]: “When Donald Trump was elected, Dr. Brunet told [REDACTED] ‘You better have your bags packed in case you need to move in a hurry.’”
- Dr. Brunet denied all of the above.

[REDACTED] of those affected:

- [REDACTED] and [REDACTED] both stated that due to the treatment they received from Dr. Brunet, [REDACTED].

Many others have witnessed the aftermath of some of the above events, such as when the witness went to them after an event to voice their concerns, vent their frustrations, or just needed a shoulder to cry on. I have not included these in the above as the witness was not a first-hand witness.

There were also reports of [REDACTED], which I will not include in this report as it is out of scope for this investigation and have forwarded to [REDACTED].

Finally, a number of people have either stated or acted in a way in which they were nervous to disclose anything for fear of retaliation from Dr. Brunet.

Conclusion

This report concludes the investigation.

Ben Weisse
CALS HR Manager

Notes on [redacted] by Professor Johanne Brunet

May [redacted]

[redacted] approached the chair of Entomology (Paskewitz, SP) for help in [redacted] was experiencing [redacted] concerns were the intimidating and angry behavior of JB when [redacted] attempted to speak with her about [redacted] experiments and progress toward completion of degree. [redacted] felt that this behavior occurred because JB discovered that [redacted] on finishing [redacted] noted that JB had been shouting and confrontational in the past, and described an incident in the car when they were returning from a meeting in [redacted] and this incident had enhanced [redacted] anxiety about interacting with JB. When JB became suspicious of [redacted] insistence on [redacted] admitted that [redacted] was [redacted] JB was visibly upset and asked [redacted] to leave her office. [redacted] arranged a meeting with the chair (Paskewitz) to talk about [redacted] and to ask for support.

After this, [redacted] expressed a [redacted] about meeting with JB to discuss [redacted] work, and the chair agreed to be present at all meetings. JB was unhappy with this solution and refused to allow the chair to be present. JB recruited [redacted] to be present instead. JB also sent the chair an email in which she accused [redacted] of being deceitful because [redacted] had not told JB that [redacted] was [redacted].

On the chair's recommendation, [redacted] asked for a committee meeting which was held to determine the experiments that were needed for [redacted]. The meeting was held during the summer of [redacted].

December [redacted]

[redacted] contacted Department chair SP by email (copy attached). [redacted] expressed concern that [redacted] were not being reviewed in a timely manner by JB and that this might interfere with [redacted] ability. [redacted] noted that [redacted] had concerns that JB did not want [redacted] to succeed.

December [redacted]

9am: [redacted] requested a meeting to discuss concerns about [redacted] admission to the lab of Professor Johanne Brunet (JB).

[redacted] noted that [redacted] had contacted her to set up a meeting on [redacted] to discuss [redacted] concern that [redacted] professor was not going to sign the documents needed for [redacted].

[redacted] noted that there had been a history of problems and that she felt we were "setting students up to fail" by admitting them to the JB program. The historical problems she mentioned were in reference to [redacted] the [redacted] after it [redacted]. [redacted] and [redacted]. She also noted that [redacted] was accepted by Brunet but is not academically qualified and has been [redacted]. She has not heard of any problems related to current students [redacted] or [redacted] (both in the [redacted] program so she wouldn't be meeting with them) in terms of relationships with JB. [redacted] suggested that the department should act to restrict [redacted] students in the JB lab.

*Susan put this together in
2016-17 about
a revision of history
by Susan*

*From Susan Paskewitz 3/16/18
have
copied*

SP sent email messages to Dave Hogg (former Dean of CALS and chair of Entomology; [REDACTED]) and Ken Raffa (associate chair of Entomology) to meet to discuss the issues.

Dave Hogg and SP met for 30 min (9:30-10). Hogg noted that the last committee meeting with [REDACTED] had been tense.

[REDACTED] The meeting was called because of [REDACTED] concern that [REDACTED] was being asked to do too many experiments and would not have time to finish [REDACTED] before [REDACTED] in [REDACTED]. The committee agreed that [REDACTED] could stop experiments and focus on writing. However, Hogg felt that JB was signaling that she was going to make it difficult for [REDACTED] to finish on time and that she would be dragging this out as long as she could. Post meeting, JB mentioned to Hogg that [REDACTED] would not talk to her about anything. Hogg commented that this might be because JB was intimidating. JB responded that she is not intimidating and said she was surprised.

Ken Raffa and Sara Rodock met with SP at 10:05. The issues with [REDACTED] were discussed. [REDACTED] refused to have an exit interview with [REDACTED] and noted that [REDACTED] just wanted to put this experience behind [REDACTED] and move on as quickly as possible. It was noted that [REDACTED] felt that [REDACTED] was being "used" because [REDACTED] was [REDACTED]. [REDACTED] felt that [REDACTED] had some issues. [REDACTED] met with Raffa in the summer of [REDACTED] before [REDACTED]. [REDACTED] was angry that [REDACTED] and [REDACTED] had [REDACTED] for [REDACTED]. [REDACTED] also told Raffa that [REDACTED] view of science was "trust no one" and "dog-eat-dog" instead of collaborative and collegial. [REDACTED] said [REDACTED] intended [REDACTED] as a result of [REDACTED] experience in the JB lab. Raffa advised that [REDACTED] might need letters of recommendation so would need to decide how far to go in challenging JB. Raffa volunteered to talk with JB if [REDACTED] wanted that. After a weekend, [REDACTED] decided to just move on.

The [REDACTED] situation was discussed. [REDACTED] had intended to [REDACTED] but did not make this deadline. In [REDACTED] moved to [REDACTED] for [REDACTED]. [REDACTED] decided to [REDACTED] sometime during the Spring semester of [REDACTED].

December-March [REDACTED]

[REDACTED] approached SP and discussed behavior by JB. [REDACTED] noted frequent anger. [REDACTED] was concerned that [REDACTED] was being asked to work long hours and weekends without overtime pay. [REDACTED] provided emails from JB that [REDACTED] interpreted as hostile. SP spoke with HR staff who said that the overtime issue was illegal and it would have to be taken to USDA. This happened and recompense was made. [REDACTED] left the lab as [REDACTED] was over.

June-July [REDACTED]

[REDACTED] initiated conversations with [REDACTED] and SP to express distress over the lack [REDACTED] the refusal to set a timeline [REDACTED] the refusal to edit or read [REDACTED] the insistence that [REDACTED] work in the field on JB projects instead of [REDACTED] down. [REDACTED] also spoke with [REDACTED] and [REDACTED] spoke with SP and expressed anxiety about offending a senior faculty member pre-tenure but were supportive for [REDACTED] related that JB had been unpleasant because of a [REDACTED] who had volunteered

with JB but then switched to paid work with [REDACTED] volunteered to help [REDACTED] in any way possible, including financial support for tuition and fees, but did not want this revealed to JB for fear of retaliation.

[REDACTED] mentioned experiencing [REDACTED] and [REDACTED] and [REDACTED] noted that [REDACTED] was fearful of raising any issues with JB for fear of retaliation. [REDACTED] also mentioned the following: 1) undergraduate students are asked to work in the field and are fearful of taking lunch or bathroom breaks; 2) one [REDACTED] worked more than 8 hours (thought 12 hrs) and was told to break it into two periods to avoid overtime; 3) on one date there was extreme heat in the field and [REDACTED] was concerned for student health so [REDACTED] called JB to explain and request permission to leave the field. She refused but said she would come to the field to discuss, which took over an hour; 4) [REDACTED] felt disrespected as [REDACTED] because JB mentioned this, grouping [REDACTED] with another student from the same place and because JB told a group that [REDACTED] would not succeed because of [REDACTED] accent and mispronunciation of words. [REDACTED] provided a series of emails documenting [REDACTED] concerns. Lance Potter, [REDACTED] and JB met to discuss [REDACTED] and how [REDACTED] would be supported during that period. JB offered 32 hours of federal job, which would include benefits. [REDACTED] was concerned that [REDACTED] would not have time to write and finish with this much work. LP, SP, and JB met to discuss options for supporting [REDACTED] SP suggested that [REDACTED] would be a more appropriate position for [REDACTED] and would allow [REDACTED] to work to a time-limited schedule. LP and SP checked with HR staff and on receiving approval, indicated this appointment should be changed to reflect [REDACTED] duties. JB refused to allow this.

[REDACTED] was hired as a [REDACTED] in the JB lab for fall.

The situation between [REDACTED] and JB worsened. [REDACTED] showed up in SP's office in tears when [REDACTED] had been in a lab meeting when [REDACTED] mentioned [REDACTED] family were at risk and that [REDACTED] brother had remained at home. [REDACTED] reported that JB made an insulting remark about [REDACTED] brother. A colleague, [REDACTED] was present and told JB that this was not acceptable. [REDACTED] decided to return to the lab meeting once [REDACTED] had regained [REDACTED] self-control.

[REDACTED] a [REDACTED] in the lab, made an appointment with [REDACTED] to visit with SP about the JB lab. [REDACTED] mentioned his own [REDACTED] noted the relationship with JB had begun well but had changed and [REDACTED] now [REDACTED] and constantly targeted/picked on. [REDACTED] and [REDACTED] discussed the climate for other students and staff in the lab. [REDACTED] mentioned that [REDACTED] and [REDACTED] overlapped and that [REDACTED] said [REDACTED] walked into the lab one evening when [REDACTED]

During a later appointment, [REDACTED] mentioned a meeting [REDACTED] had with 2 attorneys who were helping [REDACTED] with a project for the City of Madison. They met after normal hours in [REDACTED] office in the 6th floor lab. JB was there and when she found them meeting, began yelling and told them they had to leave. [REDACTED] reported that the two attorneys were shocked at this behavior and volunteered to "testify" if needed.

Shortly after this, [REDACTED] was terminated which [REDACTED] felt was retaliation for pushing back against behavior of JB. [REDACTED] reported that [REDACTED] had evidence of scientific misconduct, which was referred to Brian Fox and Phil Simon. SP met with BF and PS to discuss this issue and appropriate steps.

█████ reported that █████ was required to work on █████ work because JB █████ indicated that █████ had been contacted a number of times outside normal hours for progress updates. █████ felt pressured because she had previously said the chapters would be fine █████ but now wanted them turned into manuscripts ready for submission. This reduced time █████ had for █████

█████ reported that the manuscript for Chapter 1 was completed and submitted and that Chapter 2 was in good shape. █████ was working on Chapter 3, the final chapter, but was still concerned about having enough time for this. █████ tried to convince JB that it was appropriate to work on the manuscripts during work hours since it was █████ She disagreed.

█████ sent out the first two chapters to █████ committee for comments. JB immediately sent out an email to the committee saying █████ should not have sent them. She told █████ that █████ could not use them █████ and would have to use the original Chapters 1 and 2 (rather than the submitted manuscripts) because they were more representative of █████ writing. One of the committee members expressed anger to █████ because he had done a lot of work in relation to the manuscripts but was not a co-author. █████ informed him that authorship decisions were made by JB and that █████ did not realize the extent of the work that had been done solely █████

█████ told the chair █████ was █████ SP then contacted all relevant authorities (CALS HR, Grad School, Provost office) and received advice to █████

With consultation, it was determined that █████ could make the determination to █████ SP informed █████ of this. █████ decided to make the change and informed JB in an email that █████ informed the committee of this and worked with █████ to develop the remaining chapter and appendices █████ JB responded to █████ decision with a series of emails to the committee, dean, chancellor and provost concerning her sense that her rights as a faculty member were not followed, that █████ could not █████ and take █████ research with █████ but would have to start over, that the committee would be approving this if they participated, and that SP was attempting to steal JB's research. Brian Fox intervened and approved the process. █████ reported that JB came to █████ lab and removed a piece of equipment she had loaned █████ in retaliation.

During this time, █████ and █████ reached out to former members of the lab and asked whether they would be willing to speak about their experiences. This list was provided to CALS HR and Ben Weisse and included students, technicians and postdoctoral associates. Ben spoke with some of them and prepared a report.

6/19/18: Palmenberg note: Mr. Weisse's investigative notes are included here ONLY for individuals who gave me explicate permission to share them or be named within them.

Notes from Investigation re Johanne Brunet
By Ben Weisse

Met with [REDACTED] **on** [REDACTED]
[REDACTED] joined the Brunet lab in [REDACTED]. [REDACTED] is [REDACTED]. A few days after [REDACTED] received [REDACTED] offer letter, [REDACTED] received an anonymous letter warning [REDACTED] not to join the lab. [REDACTED] said that the letter stated that: no one had completed their work in the lab; most said they never wanted to be in science again. [REDACTED] showed it to the faculty in [REDACTED] undergrad college in [REDACTED]; they suggested that [REDACTED] still go, but that [REDACTED] keep the letter. NOTE: [REDACTED] gave me a copy of the letter (titled AnonymousLetter_BrunetLab).

When [REDACTED] began, Johanne Brunet (JB) had projects for [REDACTED], so [REDACTED] did them. [REDACTED] started seeing her behavior right away. Very soon after [REDACTED] began, JB had [REDACTED]. However, since [REDACTED] was from [REDACTED]. Thus, [REDACTED] didn't exactly know what [REDACTED] was looking for. JB scolded [REDACTED] for this. She physically slapped [REDACTED] hand; not hard, but enough to get [REDACTED] attention. [REDACTED] did not give her permission to touch [REDACTED]. [REDACTED] said that this negative physical contact was emotional for [REDACTED]. [REDACTED] said that it has not happened again since.

When [REDACTED] began, [REDACTED] had a number of questions. [REDACTED] would stop by JB's office to ask. However, just a couple weeks in JB scolded [REDACTED] for this, yelling at [REDACTED] to "stop coming to my office." She seemed stressed.

[REDACTED] said that students came into the lab usually for a PhD. Officially start as a Masters student, then, when they complete their Masters, they move to the PhD program. However, in the Brunet lab, most finish their Masters then move on, wanting to get out as quick as possible.

[REDACTED] was a [REDACTED] student; [REDACTED] said that [REDACTED] sometime in [REDACTED]. [REDACTED] left the program quite bitter toward JB. [REDACTED] and others would hear JB yell at [REDACTED]. [REDACTED] would alternate between being [REDACTED]. However, after [REDACTED] completed a [REDACTED] in the spring semester, [REDACTED] still had the summer to [REDACTED], mainly needing time [REDACTED]. Although [REDACTED] was under the impression that [REDACTED] would be put [REDACTED] for that summer, [REDACTED] was not. When [REDACTED] asked JB about it, she said [REDACTED] was useless to [REDACTED] since [REDACTED] wasn't doing any research – she wasn't going to pay [REDACTED] to [REDACTED]. [REDACTED] previously brought it to the department, but wasn't willing to talk more than that. [REDACTED] said [REDACTED] is now willing to talk about this.

[REDACTED] was a [REDACTED] student; [REDACTED] said that [REDACTED] at the beginning of the summer. [REDACTED] began with the [REDACTED] under JB, [REDACTED]

[REDACTED]. [REDACTED] said that [REDACTED] was a very nice person and ended up being a very good friend. There were a few instances that [REDACTED] knew about regarding [REDACTED]:

- About a year ago, [REDACTED] was driving back from a conference [REDACTED]. The entire way back [REDACTED] told [REDACTED] that JB belittled [REDACTED], calling [REDACTED] stupid and dumb.
- [REDACTED] often saw [REDACTED] crying; whenever [REDACTED] would ask [REDACTED] about it, it was always that JB was calling [REDACTED] stupid, or some equivalent.

- One night in the fall of [REDACTED], when [REDACTED] was trying to [REDACTED], [REDACTED] was very stressed out. [REDACTED] that [REDACTED]. [REDACTED] ended up [REDACTED] and [REDACTED], finishing around May of [REDACTED].
- When [REDACTED] left JB's lab, [REDACTED] went to [REDACTED]. [REDACTED]
- The last time [REDACTED] saw [REDACTED], [REDACTED] looked horrible, like a shell of [REDACTED] former self.

[REDACTED] said that JB would pick on [REDACTED] and belittle [REDACTED] a lot. A couple examples:

- JB told [REDACTED] that the only reason [REDACTED] got into UW-Madison is because [REDACTED] is a minority.
- JB picked on [REDACTED] accent a lot. Although she would often say that [REDACTED] needed to fix [REDACTED] accent so that people would take [REDACTED] seriously, she picked on [REDACTED] a lot for it.
- During one instance, JB told [REDACTED] that [REDACTED] should pack up and go back to [REDACTED] country ([REDACTED])
- In June of [REDACTED], there was a student from [REDACTED] who came for the summer. [REDACTED] was from [REDACTED] and had a less distinct accent. JB told this student that [REDACTED] had a beautiful accent; much better than [REDACTED] accent.
- In [REDACTED], shortly [REDACTED], JB came in laughing that there was going to be a [REDACTED]. When [REDACTED] asked her why she was laughing, she just said it was a [REDACTED]. [REDACTED] said she shouldn't laugh and this [REDACTED] is worried for [REDACTED] family. She said "if they are so worried, they can come here." [REDACTED] said she very well knew that it was not possible. Note: [REDACTED] was present and could verify this.
- A couple days after this, right after [REDACTED], there was a lab meeting. At the lab meeting, JB asked if [REDACTED] family was [REDACTED] said they were. JB said "Your brother stayed in his house? He must be very dumb." [REDACTED] was very upset by this as [REDACTED] had not heard from [REDACTED] family yet and didn't know if they were safe. [REDACTED] left the meeting. All others in the lab were at that meeting except [REDACTED] saw [REDACTED] as [REDACTED] was walking out. [REDACTED] asked [REDACTED] what was wrong since [REDACTED] was crying; [REDACTED] said [REDACTED] hadn't heard from [REDACTED] family in a few days. [REDACTED] did return to the lab meeting.
- After the lab meeting, JB went to [REDACTED] and said "I didn't know you would be upset by my comments"; she did not apologize.

Others in the lab:

[REDACTED] – program is in [REDACTED]; [REDACTED] been here [REDACTED] years; hoping to [REDACTED] in a year or so.

[REDACTED] – [REDACTED] from [REDACTED]; [REDACTED]. [REDACTED] is new, so will think JB is fine.

[REDACTED] – [REDACTED] – started in August

[REDACTED] – [REDACTED] – although something happened this week and [REDACTED]

[REDACTED] – [REDACTED] – started in August

In the summer, some of the students were watching bees in the field with [REDACTED] asked to be picked up. JB hated this as any time away to pick up someone would be time away from the field and wasted time. JB had yelled at [REDACTED] for picking up a student in the past.

One day in the field, it was hot and some of the students were not feeling well. [REDACTED] called JB and told her. JB said to drink plenty of water and wear a hat (which they were doing), but to stay in the field until

she arrived. She didn't arrive for almost 2 hours later. When [REDACTED] confronted her about it, JB told [REDACTED] "You need to know who's the boss around here."

Others in the lab that have come and gone – all with negative experiences:

- [REDACTED] was there from [REDACTED] [REDACTED] [REDACTED] Now in [REDACTED] to [REDACTED].
- [REDACTED] – started in the summer of [REDACTED]; of the lab in April [REDACTED]. [REDACTED] had a very bad experience [REDACTED].
- [REDACTED] – lasted [REDACTED]; March – May of [REDACTED].
- [REDACTED] – fired by JB out of the blue. In the lab from [REDACTED]; [REDACTED]. [REDACTED] believes [REDACTED] is [REDACTED] now, but will return in December.

[REDACTED] said that JB used her USDA power to threaten her students.

[REDACTED] has been surviving for [REDACTED] years. JB made [REDACTED] work many hours on her projects, giving [REDACTED] hardly any time to work on [REDACTED] own projects. [REDACTED] was originally supposed to [REDACTED]. Set this up because [REDACTED] housing was expiring at the end of August. However, JB gave [REDACTED] many projects not related to [REDACTED] paper. When [REDACTED] finally found time to write a couple chapters [REDACTED], [REDACTED] gave them to JB to review. However, JB said that [REDACTED] should give it to someone else to review as she didn't have time. [REDACTED] begged her to review it as she was the one that really knew what [REDACTED] was working on. She said she was too busy. [REDACTED] stated that [REDACTED] was working 7 days a week, with most of the time going toward JB's projects.

[REDACTED] was being paid [REDACTED]. When attending a conference with JB in [REDACTED] in June, JB told [REDACTED] that [REDACTED] would not have money to pay [REDACTED] in the fall. As a result, [REDACTED] would be dropped. [REDACTED] protested, stating that [REDACTED] had already [REDACTED] and said [REDACTED] needed money and also the health insurance. JB said that perhaps she could find money on the USDA side – but it wouldn't include insurance. [REDACTED] said [REDACTED] took it as [REDACTED] did not have any other options. [REDACTED] worked 28 hrs/week [REDACTED] – it does not have benefits so now has health insurance from the ACA marketplace. [REDACTED] is also a student, so needs to pay tuition and fees. [REDACTED], so has [REDACTED].

[REDACTED] stated that [REDACTED] is being subjected to harassment and bullying.

On 9/5 [REDACTED] JB returned from a conference. She chose 2 of [REDACTED] papers to submit, which she needed to submit by 9/30. She pulled [REDACTED] off other duties and had [REDACTED] work on the papers instead. She made [REDACTED] work additional hours on this paper as well, telling [REDACTED] that this was more important [REDACTED] as it would go [REDACTED]. [REDACTED] stated that 2 papers in one month is a lot. It put a huge strain on [REDACTED] mentally and physically. By the end of September, [REDACTED] started getting physically ill. Despite [REDACTED] illness, JB stressed the importance of getting the paper completed by the end of the month. [REDACTED] estimates that [REDACTED] was working approximately 40-50 hours/week extra to complete these papers... this is on top of the 28 hours that [REDACTED] was paid. [REDACTED] said [REDACTED] was sleeping only 1-2 hours/night [REDACTED] told JB about [REDACTED] stress, [REDACTED] lack of sleep and feeling sick, but she just said that's the [REDACTED].

Since the middle of September, [REDACTED] said that JB has greatly increase the number of emails and texts sent to [REDACTED]. The amount of emails felt like harassment.

In mid-[REDACTED], shortly before [REDACTED] [REDACTED], JB came into the meeting laughing, stating that [REDACTED] [REDACTED] [REDACTED] asked why

she was laughing. She simply said it was weird that [REDACTED] is from there and [REDACTED] [REDACTED] asked her not to laugh as [REDACTED] is very concerned about [REDACTED] family. JB said "If they are so worried, they can come up here." [REDACTED] said they cannot simply come up here; the cost and logistics would not allow it. JB then said "Well, that's their problem." JB was rather matter-of-fact during this conversation, with no show of concern for [REDACTED] or [REDACTED] family.

A day or two later; right after [REDACTED], as a lab staff meeting was about to begin, others in the lab were asking [REDACTED] with concern about [REDACTED] family. [REDACTED] starting telling them that [REDACTED] hadn't heard from [REDACTED] brother, who stayed in his house. As [REDACTED] was saying this, JB walked in. She then said: "Your brother is still in his house? He must be very dumb." [REDACTED] said all of the lab was there except [REDACTED] who was running a little late. [REDACTED] got up and left. [REDACTED] ran into [REDACTED] in the hall, who saw [REDACTED] crying. [REDACTED] asked what the problem was; [REDACTED] told [REDACTED] that [REDACTED] was unsure of [REDACTED] brother's safety. [REDACTED] did return to the lab meeting after composing [REDACTED] self. JB continued the meeting as if nothing had happened. After the meeting JB went to [REDACTED] and said "I didn't know you would be that upset." Thus, it wasn't really an apology. That is far as the conversation went.

[REDACTED] said that, with the stress of all the work, [REDACTED] [REDACTED], [REDACTED] became sick and was out of the lab for a couple days, but kept working. A couple days later JB told the staff that every day the members of the lab need to report to JB what they did that day. [REDACTED] felt this was directed at [REDACTED]

At the end of September, at a lab meeting, out of the blue, JB said to [REDACTED] "Oh, you are not using those 2 papers [REDACTED]." [REDACTED] replied: "But it's my research, my work." JB said: "I edited it so it cannot be used." [REDACTED] started to respond again but JB quickly said "No. No further discussion."

After the meeting, she again told [REDACTED] that [REDACTED] cannot use those papers. She said she would ask other professors if the papers could be used. A couple days later, after checking with other professors, she said "I guess you can use the papers. But if I were you, I would think about if you want to. [REDACTED] everything in those papers. I don't think you will be [REDACTED] everything in it" [REDACTED] said she was referring to the work that she did, and made it seem like she would make it especially hard for [REDACTED]. After this, [REDACTED] said that [REDACTED] offered to assist [REDACTED].

The papers were submitted on the deadline of 9/30. [REDACTED] asked JB for the papers, but JB said she forgot to send it to [REDACTED]. When [REDACTED] received the papers, [REDACTED] submitted them [REDACTED]. On 10/3 [REDACTED], JB sent an email to [REDACTED] committee stating that [REDACTED] should not have done that.

That night [REDACTED] said that [REDACTED] started to have [REDACTED] [REDACTED] also said that he [REDACTED] [REDACTED].

The next day, [REDACTED], [REDACTED] went into the lab. [REDACTED] then went to Susan Paskewitz and begged her for help, stating [REDACTED] cannot continue like this. [REDACTED] said the department [REDACTED] right away as [REDACTED] had big issues.

On [REDACTED] [REDACTED] On [REDACTED] [REDACTED] Brunet lab. [REDACTED] [REDACTED] said [REDACTED] did not tell JB about this change.

The night of [REDACTED] [REDACTED] said [REDACTED] had [REDACTED] first good night's sleep in a long time.

On 10/9/█, JB told the committee that █ could not use the submitted paper. However, █ learned from Susan Paskewitz that the committee rejected JB's comments. █ said the committee is very supportive of █

█ said I should talk to █. █ said that JB shook █ by the neck. Since █ was a student of █, they had a faculty meeting about how to handle JB.

I asked █ what █ wanted by talking to me. █ said that █ hopes that, by speaking up, that █ would like justice for the events of the past. █ also said that █ hopes that no other student has to be subjected to what █ and others were subjected to; namely, the possibilities of mental and physical health.

█ is concerned about █, as █ had █ and would be especially susceptible to the treatment of JB. █ needs to be protected.

Met with [REDACTED]:

[REDACTED] is a former [REDACTED] in the Brunet lab. [REDACTED] has close to [REDACTED] years of science experience.

[REDACTED] was termed by Johanne Brunet (JB) recently. [REDACTED] claims [REDACTED] was terminated by JB [REDACTED] was a big supporter of [REDACTED] and had corroborated [REDACTED] story.

[REDACTED] said that JB is usually nice to people when she wants them to join the lab and for the first few months in the lab. Before starting in the lab, [REDACTED] was warned that she will eventually turn on you; however, [REDACTED] did not heed the warning and learned that this is accurate. [REDACTED] was a big supporter of JB the first few months [REDACTED] was in the lab.

[REDACTED] said the [REDACTED] was a [REDACTED] in the lab. JB told [REDACTED] that [REDACTED] was stupid and unable to problem solve. [REDACTED] could tell that [REDACTED] was unhappy, but didn't know why. [REDACTED] was there when [REDACTED] was a supporter of JB, so [REDACTED] would understandably not go to [REDACTED] to talk about this.

[REDACTED] said that [REDACTED] was another [REDACTED] in the lab. [REDACTED], too, was unhappy. [REDACTED] said that [REDACTED] told [REDACTED] that JB would constantly nit-pick and that [REDACTED] felt that nothing [REDACTED] did would be right in JB's mind. [REDACTED] quit after [REDACTED] even though [REDACTED] did not have another job lined up.

[REDACTED] said that JB would pick on [REDACTED] accent. [REDACTED] witnessed JB pick on [REDACTED] accent, stating that [REDACTED] English and grammar were not good and that [REDACTED] accent was not professional. In addition, [REDACTED] told [REDACTED] that she said things to [REDACTED] about [REDACTED] accent quite often.

[REDACTED] said that at a staff meeting in mid-[REDACTED], the lab members knew that [REDACTED] and asked [REDACTED] who [REDACTED] family was. [REDACTED] said that [REDACTED] hadn't yet heard from [REDACTED] family. JB then said "You mean he didn't go to higher ground? Boy is he dumb." [REDACTED] didn't say anything, [REDACTED] just left. [REDACTED] said that [REDACTED] confronted JB at that staff meeting, saying "Can you imagine what [REDACTED] is going through right now? Put yourself in [REDACTED] situation." [REDACTED] said that JB didn't say anything; instead she looked angry and just started the meeting as if nothing happened. [REDACTED] said that [REDACTED] heard that later in the day that JB told [REDACTED] that [REDACTED] needed to control [REDACTED]

[REDACTED] said that when you are the bad side of JB, she constantly used snipes, making subtle attacks – such as her comments about [REDACTED] accent. She would always claim that she is just trying to help, but the fact that she brings it up a lot and says it in a condescending way is hurtful and not helpful.

[REDACTED] said that JB occasionally blows up. Example: about 2 weeks ago [REDACTED] had a person meeting with 2 attorneys about a personal item unrelated to the lab. [REDACTED] in which [REDACTED] needed to be around [REDACTED]. [REDACTED] had the attorneys come [REDACTED] so [REDACTED] While [REDACTED] was in the middle of [REDACTED] meeting, JB came in and said that it was illegal activity having this meeting and kicked them out. [REDACTED] said it was embarrassing and knew it was not illegal, but confronting JB would just make it worse, so [REDACTED] said nothing.

[REDACTED] said that if you are on JB's bad side, everything you do is wrong. Example: Two days after the incident in which JB Kicked out the attorneys, the lab was short on a certain enzyme so [REDACTED] ordered the enzyme and told JB. JB said they had that already and that this was a waste of money. [REDACTED] said that JB had a different enzyme in mind and that the enzyme that [REDACTED] ordered was really needed. Although [REDACTED] pointed this out, JB simply said that [REDACTED] would waste money all the time.

█ gave another example of a blow-up by JB: In early June, █ was █ in the field at the West Madison station. One █, █ couldn't go to the field in the morning. In the middle of the day █ was ready to go to the field but called █ first to make sure █ should still come, as it looked stormy outside; and if so, if █ could get picked up. █ said it did not look safe to leave the 2 █ in the field as it looked stormy and started to rain and there would not have been a good place for them to go if it did storm, so █ took the 2 █ to campus to pick up █. They came back and the skies were looking improved so they went back in the field. During this time, JB happened to go to the field and noticed that no one was there. She was furious. When she asked where they were, █ explained, and JB yelled "It wasn't raining!" But it did rain. It was such a blatant falsity that after that incident, the students would often joke about it raining when told that JB would be coming soon. Also, JB yelled at █ that from now on, no more picking up students; they would have to take the bus.

█ said that JB tries to milk every minute and every nickel from every employee.

When asked if JB treats people differently based on race, nationality, gender, or any other reason, █ said that she treats everyone poorly. █ could not say if race was an issue as she really did go after all people eventually. However, JB did pick on █ accent, but that just seemed like the way to treat █ poorly.

█ did say that █ is an exception. █ said that █ uses humor to deflect JB's words. █ tried to smooth thing and humor her.

█ said that JB had issues regarding █. Although █ provided examples of █, this is not a concern of this investigation █.

Met with [REDACTED]:

[REDACTED] is [REDACTED] in the Brunet lab; [REDACTED].

[REDACTED] stated that since [REDACTED] began things have been weird. Since [REDACTED] first day, [REDACTED] and [REDACTED] have been warning about Johanne Brunet (JB). [REDACTED] and [REDACTED] are generally friendly. However, they often tell [REDACTED] “don’t get on her bad side” or don’t do anything that will make JB bad with you.” [REDACTED] said the complaints have only gone one way, as JB has not complained about [REDACTED] or [REDACTED]. However, since both [REDACTED] and [REDACTED] are gone, things have gotten better.

[REDACTED] had been very stressed. [REDACTED] knows that [REDACTED] is a very stressful time.

When starting this summer, [REDACTED] did field work and was given the authority to lead this work. [REDACTED] said that the field work involved observing bee behavior; these observations were done in pairs. Knowing that [REDACTED] was [REDACTED], whenever there was an odd number of people available, [REDACTED] would leave [REDACTED] behind so [REDACTED] could [REDACTED]. [REDACTED] said that JB would stop by every day – usually for 30 to 60 minutes to check to see how things were going.

During the field work, [REDACTED] would sometimes have problems. [REDACTED] kept insisting that wind would have an impact on movement and that, by not checking wind, we would not be getting the full story of their movement. As a result, [REDACTED] was concerned that [REDACTED] was focusing too much on the wind and not enough on what [REDACTED] was called to do. [REDACTED] would often complain to the group that JB was doing it incorrectly.

At a meeting in mid-[REDACTED], all in the lab were present except [REDACTED]. [REDACTED] asked [REDACTED] if [REDACTED] family was safe from [REDACTED]. [REDACTED] said that [REDACTED] parents were safe but [REDACTED] brother was at home and [REDACTED] hadn’t heard from him. JB entered at that moment and said “Why is your brother so dumb?” [REDACTED] said “that was not nice.” JB said “but he has a kid. He is being dumb.” [REDACTED] left the meeting. JB then started the meeting as if nothing happened. However, [REDACTED] said to JB: “Try to put yourself in [REDACTED] situation.” [REDACTED] said that JB can sometimes be too blunt. [REDACTED] thinks that JB is not trying to hurt someone – just being frank. JB does not have a filter. JB said that she went to [REDACTED] afterwards to apologize; however, [REDACTED] told [REDACTED] that it was not really an apology.

[REDACTED] has an accent; [REDACTED] said that [REDACTED] has never heard JB comment on anyone’s accent.

At a meeting at the end of September, there was a short conversation between JB and [REDACTED]. [REDACTED] was supposed to have 4 chapters completed, but [REDACTED] only had 2 completed. [REDACTED] had been working with JB on getting these 2 in a journal. [REDACTED] wanted to use these revised versions [REDACTED], but JB said it would not be appropriate as JB worked a lot on these papers, so it was not really [REDACTED] work. [REDACTED] said that, while an advisor can have [REDACTED], it should be mostly [REDACTED]. JB felt that she put in too much work. JB said that instead, [REDACTED] should submit [REDACTED] original chapters – prior to when they did the work in prep for the journal. [REDACTED] said that what is acceptable [REDACTED] is changing. Used to be more original work; however, because of expectation of publishing [REDACTED], more and more combination [REDACTED]. Bottom line, this is a judgment call as to whether or not [REDACTED] should be allowed to use the journal [REDACTED]. [REDACTED] said that the biggest issue was just a lack of communication. JB didn’t tell [REDACTED] ahead of time that [REDACTED] could not use it and [REDACTED] didn’t tell JB ahead of time that [REDACTED] was planning to use the revised paper.

[REDACTED] said no longer have problems in the lab. The problems before were not that there were bad people; rather there was just poor communication.

Met with [REDACTED]:

[REDACTED] is a [REDACTED] of the Department of [REDACTED].

[REDACTED] has been in the department for more than [REDACTED]

There have been a lot of students that have come to [REDACTED] regarding issues with Johanne Brunet (JB):

- [REDACTED] – [REDACTED] is a minority. [REDACTED] started [REDACTED] with the intention of [REDACTED]. However, [REDACTED] told [REDACTED] that there were issues with JB – that JB would say one thing, then change directions. [REDACTED] did [REDACTED], then [REDACTED].
- [REDACTED] – [REDACTED] was [REDACTED] with JB. [REDACTED] said that [REDACTED] wasn't the strongest candidate, but that others opted not to come here, so [REDACTED] was chosen. [REDACTED] was shy and withdrawn. [REDACTED] experience was a typical experience in the JB lab – things would go fine until it was time to finish; JB would give [REDACTED] more/different work as [REDACTED] completion neared the end. After [REDACTED] [REDACTED], [REDACTED] on campus; however, [REDACTED] earlier this fall; [REDACTED] had a very bad experience with JB that left [REDACTED] as a shell of a person. [REDACTED] shared some things with [REDACTED], but these conversations with confidential, so could not bring these up.
- [REDACTED] - Around the time that [REDACTED] was [REDACTED], [REDACTED] started developing problems. [REDACTED] had more direct conversation with chair Susan Paskewitz than [REDACTED] did. At one point there was a meeting that included Dept Administrator Lance Potter, Susan Paskewitz, [REDACTED], and JB in which they talked about the funding for a student. Usually when there are meeting with faculty about funding a student, the faculty member is trying to figure out how to help the student. In this meeting, JB was very dismissive and rude; she was very defensive and adamant about not using any of her funds. JB had tried to not meet. JB accused [REDACTED] of being shady. JB sent an email to [REDACTED] stating "my time is important. What is really going on" as if [REDACTED] was trying to pull one over on JB.

[REDACTED] noted that in Entomology students begin in a Masters program before proceeding to a PhD program. Although most go on to the PhD program, not in Brunet's lab. Most end of leaving after the Masters, which is quite unusual.

[REDACTED] said that the usual pattern was that a student would be doing well until the end of a program. At the end, JB would give the student a lot of work. JB's expectations would then change.

[REDACTED] stated that not one student from Entomology did not have issues with JB. [REDACTED] did not know about those students who came from [REDACTED] program.

[REDACTED] said that JB had [REDACTED] students that came with [REDACTED]. When JB first started, JB said she wanted to be more diverse and hired [REDACTED]. However, it seems that JB [REDACTED].

[REDACTED] said that JB preys upon a student's weakness. If the student has mental health issues, she will prey upon that weakness. If the student is [REDACTED], she will prey upon that student's insecurity of being [REDACTED]. JB sees herself as above other groups. She told [REDACTED] "You are just [REDACTED]."

█ said that JB's pattern starts with Micro-aggressions; example: with █, start with "you █ hang out together" and progress to "Your accent is funny."

Met with [REDACTED]:

[REDACTED] is a [REDACTED] in the Brunet lab.

[REDACTED] said that when interviewing for the position, Johanne Brunet (JB) was great. However, about 2-3 weeks into the job, [REDACTED] made a judgment call on an order. When JB found out, she wasn't happy and let [REDACTED] know it. From that point on, things went downhill.

[REDACTED] said that the biggest issue was a lack of communication. JB would tell [REDACTED] one thing, then would expect that [REDACTED] to know everything about it. JB would then judge [REDACTED] on things that [REDACTED] would have no way of knowing. [REDACTED] said that when JB would make expectations clear, she would change the expectations part way through and blame [REDACTED] for not knowing it should have been changed.

A tipping point for [REDACTED] came with how JB treated [REDACTED] named [REDACTED]. [REDACTED] and [REDACTED] were working in the field. [REDACTED] saw JB go to [REDACTED]; while in the field [REDACTED] saw that JB was clearly angry. Although [REDACTED] could not hear the conversation, it was obvious that JB was yelling at [REDACTED]. After JB left, [REDACTED] started crying. [REDACTED] told [REDACTED] that JB had asked [REDACTED] to lie on [REDACTED] timesheet; and that [REDACTED] found out accidentally that this was illegal and it needed to be corrected. [REDACTED] said that JB yelled at [REDACTED] for telling someone about the timesheets.

[REDACTED] said that JB never asked [REDACTED] to do anything illegal. However, when [REDACTED] saw how JB treated [REDACTED] and recognized that the situation was not good with JB, [REDACTED] decided to leave. Bottom line, [REDACTED] did not feel respected.

[REDACTED] said that [REDACTED] at that job were very stressful. [REDACTED] [REDACTED] well because of the stress.

Met with [REDACTED]:
[REDACTED] is a [REDACTED] in the Brunet lab.

[REDACTED] said that when starting, Johanne Brunet (JB) is nice. However, once one thing goes wrong, she becomes mean from then on.

[REDACTED] said the first incident with JB occurred when [REDACTED] was doing field measurements for a new planning field. While doing this, [REDACTED] noticed that bees starting to emerge; didn't tell JB right away but continued working on the field. JB told [REDACTED]: "Why didn't you tell me sooner. I pay you out of the goodness of my heart." Later that evening, at about 8pm, JB emailed [REDACTED]: "What you did today was not acceptable."

At the end of the summer, JB asked [REDACTED] to go from [REDACTED] however, JB said [REDACTED] couldn't log more than 30 hours/week, so told [REDACTED] to keep track and put those hours down later in the winter, when working less than 30 hours/week. [REDACTED] kept track of the hours. In January, [REDACTED] was going to be off a couple weeks so wrote in the timesheet the extra hours. Thus, although [REDACTED] was off, the system showed that [REDACTED] was working. In a couple months later, [REDACTED] was talking to Susan Paskewitz and the topic of hours came up and [REDACTED] explained this banking of hours arrangement that JB had. Susan explained this was inappropriate and said this needed to be corrected. Apparently, and unbeknownst to [REDACTED], Susan told Phil Simon and Phil Simon told JB. One afternoon, JB came out to the field and went up to [REDACTED] and said "What's this I hear from Phil about overtime." [REDACTED] did not know what all JB knew or what JB should know, so kept quiet. JB's voice, while not raised was very confrontational and very upset. When JB left, [REDACTED] started hyperventilating and crying because this confrontation upset [REDACTED]

Shortly after, in front of the lab team, JB stated in a very condescending way: "You never have run an experiment." [REDACTED] said this was especially odd because JB was on [REDACTED] when [REDACTED] was a [REDACTED] and knew very well of [REDACTED] experiences.

[REDACTED] had been overseeing the work of another worker – perhaps [REDACTED]. [REDACTED] worker showed up late a couple times; [REDACTED] told JB. The person never came to work again.

[REDACTED] said that, like most lab members in the Brunet Lab, they did a lot of bee observations. When JB was present, she would yell at them a lot. JB said "I pay you out of the goodness of my heart."

[REDACTED] said that [REDACTED] was always upset. [REDACTED] would not want to check email and would start crying when thinking of JB.

[REDACTED] said that JB complained about [REDACTED] accent. JB said that [REDACTED] was hard to understand, even though everyone else could understand [REDACTED] just fine.

[REDACTED] said that [REDACTED] seemed to get along with JB the best, because of [REDACTED] easy-going personality.

Met with [REDACTED]:
[REDACTED] is a [REDACTED] in the Brunet Lab.

[REDACTED] started in the fall and stated that everything seemed great in the beginning. The first year was great with a lot of training. However, at the beginning of the first summer, things started to get bumpy. [REDACTED] was planning a trip to conduct research and had submitted a budget for the trip to Johanne Brunet (JB). It took a while for JB to get back to [REDACTED]. JB was not as familiar with the research needed and did not seem interested. However, JB did tell [REDACTED] to do the trip and JB and [REDACTED] would get reimbursed. However, when [REDACTED] returned, JB did not approve everything; as a result, [REDACTED] had to pay about \$800 out of pocket. After the trip, [REDACTED] had to do a budget for everything.

By fall, JB started to be a hindrance. Classes were going well for [REDACTED], but JB started to hinder [REDACTED] growth. [REDACTED] started [REDACTED]. Although [REDACTED] research was going well, markers were needed and these cost money, which was now a big problem with JB.

By the following spring, [REDACTED] was given the idea that [REDACTED]; that maybe have a better experience. [REDACTED] thought that perhaps [REDACTED] then switch. Later that spring [REDACTED] met with JB and told her about [REDACTED] then switching. JB was furious. After this meeting, JB would constantly ask [REDACTED] for reports and information.

On June 14, [REDACTED], JB stopped by to talk to [REDACTED]; however, [REDACTED] was very involved in a project and did not give JB full attention. JB grabbed [REDACTED] by the shoulders and shook [REDACTED] violently, screaming at [REDACTED] to listen to her. [REDACTED] rushed out of the lab. [REDACTED] said that one secretary saw [REDACTED] and asked what happened, and [REDACTED] told the secretary. [REDACTED] felt ashamed and could not go back to work with JB. When [REDACTED] went back to the lab pack up and leave, [REDACTED] saw lab member [REDACTED] and told [REDACTED] what happened. [REDACTED] told [REDACTED] other things that had happened. [REDACTED] told [REDACTED] to contact [REDACTED] if [REDACTED] needed anything.

Prior to this even, [REDACTED] said that JB would get angry. [REDACTED] told Phil Simon about this, but nothing happened.

After the shaking incident, [REDACTED] was contacted by JB who said "I am paying you, you need to show up." [REDACTED] replied back: "I will never meet with you alone."

[REDACTED] told the Chair of [REDACTED], what happened. However, [REDACTED] was mainly concerned about JB and didn't seem too concerned about [REDACTED]. [REDACTED] set up a meeting for the 3 of them to get together. [REDACTED]. When the meeting occurred, JB's version was that [REDACTED] was a lazy, mediocre student that didn't meet performance; [REDACTED] stated that this was not true and that [REDACTED] should check with others in the lab to confirm. [REDACTED] became uncomfortable, realizing that JB was lying. [REDACTED] tried to convince [REDACTED] to just [REDACTED], but [REDACTED] said no. [REDACTED] does not recall why, but [REDACTED] heard about this and asked for details. [REDACTED] found money to pay for [REDACTED] final year of [REDACTED] and took over as advisor. When [REDACTED] tried to get the research that was collected, JB said it was USDA property and would not allow it. All that data was lost and [REDACTED] had to start new.

[REDACTED] heard that JB [REDACTED]. However, it didn't seem to help. [REDACTED] was disappointed that nothing happened. People gave JB the benefit of the doubt; [REDACTED] was disappointed

when learning that JB was granted tenure. [REDACTED] stated that there should be some type of moral standard that one has to meet before being eligible for tenure.

Had [REDACTED] not been as strong and confident a person, the damage could have been much worse. As it was, to re-think and re-live that moment of [REDACTED] was difficult.

[REDACTED] said that JB is obsessed with money for the lab. [REDACTED] said that JB [REDACTED] because she would get funds. JB really could not [REDACTED]; she only cared about the money [REDACTED]. [REDACTED] said that [REDACTED] doesn't really care about the students. [REDACTED] used the example of authorship. Usually professors try to get students to get published. JB, on the other hand, usually puts herself first and sometimes does not include students at all.

[REDACTED] hopes that something can be done about JB. At a minimum, put a flag out to potential students so they know. [REDACTED] stated that [REDACTED] was a smart student; however, after working with JB, [REDACTED].

Met with [REDACTED]:

[REDACTED] is a [REDACTED] in the Brunet Lab.

[REDACTED] entered the program in the fall [REDACTED], but was considering a [REDACTED] eventually.

[REDACTED] said the first year went well. [REDACTED] said that Johanne Brunet (JB) thought that [REDACTED] was a good worker. JB would talk about the [REDACTED] with [REDACTED].

[REDACTED] first noticed bad behavior in the summer. [REDACTED] said that JB had them work in the field for many hours in the summer, usually starting at 8 or 9am and working until about 6pm on Mondays thru Saturdays. [REDACTED] said that JB would expect them to put on their sunscreen before they arrived as she didn't want to pay for them applying sunscreen. They did get off when the weather was not cooperating. [REDACTED] said that they would work between 40-50 hours a week in the field. [REDACTED] said that when JB came to the field she was mean. [REDACTED] said that JB was mean when she went to the field. [REDACTED] recalls the lead worker, [REDACTED] being yelled at by JB because there were not 6 people in the field; however, JB never told any of them that there needed to be 6 people in the field. JB would yell "I spent X amount of money on this project and you are all getting paid so you need to do this."

Since they had to be in the field so much, [REDACTED] had very little time to do [REDACTED] own research. The only time to work would be the half days that the weather didn't cooperate.

In addition, that summer JB would frequently ask [REDACTED] about [REDACTED]. The way [REDACTED] was feeling about the summer, there was no way [REDACTED] wanted to continue with JB; however, [REDACTED] was afraid to tell JB. [REDACTED] was thinking of asking another faculty member, [REDACTED]. At the end of the summer, [REDACTED] did talk to [REDACTED] said it was complicated, but that it could be done.

In early fall, [REDACTED] travelled with JB to a conference in [REDACTED]; besides a conference, one of [REDACTED] committee members was in [REDACTED]. While there, things mostly went fine – they put [REDACTED] down a few times, but [REDACTED] was used to that. Near the end of the time in [REDACTED], JB asked [REDACTED] a [REDACTED]. [REDACTED] said no. This made JB angry. On the way back, [REDACTED] made a navigational error. The entire way back JB kept ridiculing [REDACTED], saying things such as "You are so bad at this." [REDACTED] felt trapped. [REDACTED] cried while telling me this story.

The day after they returned from [REDACTED], [REDACTED] contacted [REDACTED] and asked if he would be [REDACTED]. He agreed. When JB learned that [REDACTED] went to [REDACTED], JB tried to get [REDACTED] kicked off [REDACTED] she tried to get other committee members against [REDACTED]. JB also began making it hard for [REDACTED] to make progress. When [REDACTED] thought [REDACTED] was near, JB would change the expectation which would extend the time. In addition, when [REDACTED] had written part [REDACTED] and would ask JB to review, JB would reply that she didn't have time to read the paper. [REDACTED] would do experiments and needed JB to say there was a sufficient amount. However, JB kept telling [REDACTED] that more experiments needed to be done. The extra experiments amounted to [REDACTED] that [REDACTED] had to stay.

[REDACTED] went to the Chair of Entomology, Susan Paskewitz, but Susan suggested that [REDACTED] should work harder or communicate better. Susan also suggested that [REDACTED]

█ didn't want to meet alone with JB. When JB planned a meeting, █ would invite Susan Paskewitz; JB would cancel. This happened a couple times. Eventually, Susan gave up and asked that, instead of meeting one-on-one, that █ committee meets.

Early in █, JB sent an email to the lab threatening to take away funding for the greenhouse. She stated that she spends a lot of money on greenhouse rental space but gets little/no results. She said that if no progress was made, she would stop paying for the space. (copy of email forwarded by █ on █) █ said that this would devastate the research done by █ and one or two other students. █ stated that the email also accused the lab members of taking too much vacation time – but █ said that no one would use too much vacation time because JB would never let them.

█ was very stressed about the possibility of stopping the funding for the greenhouse. █, but they just said that if JB does close it, █ should tell them.

█ felt that JB would constantly change her expectations of what research was needed. █ would finish an experiment and think it was enough, but JB would state that █ needed more. █ said that █ asked for the committee to meet to discuss █. JB took control and started the meeting in an aggressive tone, saying "I am running the meeting. We are here because █ doesn't want to do experiments. Whenever █ tried to talk, JB would interrupt. Although the meeting lasted 2 hours and was horrible to be part of, in the end the committee sided with █, so █ was able to █

█ said that JB would often say that █ research was not very good and unpublishable. However, when █, JB said to take a couple weeks off then you should start to work on the paper. JB then said "Just to be clear, it will be me to submit this paper." █ said this was frustrating because █ is the one that did all the work. █ said there was no desire to write the paper because there was no way █ was ever going to work with JB again, plus █ would not get the deserved credit for it.

█ said that JB was to publish 2 papers per year as a USDA employee. █ was not certain if they need to be 1st author or not.

During committee meetings, █ said that JB was usually rude and would put down █ in front of the group.

When asked if JB ever did anything physical, █ said that JB had a habit of kicking a person's foot or pushing on a person's shoulder – the way a friend would do if they were joking with you. However, JB was not a friend; this was inappropriate.

█ said that JB treated █ worse than anyone else. █ said that JB would make rude comments about █ accent. JB would always correct █ on words that █ missed and would make a joke about it. █ asked her to stop, but she continued.

█ said that JB was very reluctant to give █ time off to go home to █

█ said that when Donald Trump was elected president, JB told █ "You should have your bags packed in case you need to move in a hurry." This was especially odd █.

████ said that, for a while, █████ seemed to be JB's favorite; however, for some reason, █████ became the one treated the worst.

████ said that JB would talk about other lab members behind their backs. JB told █████ some things about █████ and █████. █████ knows that JB said things to others about █████ – whenever JB would say something about someone, the lab member would tell the target of JB's comments.

Overall, █████ said that the whole experience gave █████ major stress. █████ said █████ time with JB has had an impact on █████; but things are getting better.

████ said that JB was bad right down to the end. Even after it was all finished, JB said "Congratulations. I'm surprised you finished."

My meeting with █████ ended. Later that day, █████ emailed me an additional story. The basis of the story was that █████ felt so █████ that █████.

~ late november?
11/28/18 - From Joanne

Date? when did Dr Brunet write this?

Meeting notes – Brunet Lab workplace review
November 15, 2017 @ Ag Hall, conference
room 250
Meeting began around 2pm

To Ben

From
Dr Brunet
3/16/18
(hard copy only)
Acphas

Present: Joanne Brunet, Ben Weisse, Kristin Carroll

Please check the spelling of my name. Thank you.

Prior to the meeting, Dr. Brunet arrived with her attorney, Mark Hazelbaker. Mr. Weisse explained that we would need to re-schedule this meeting as UW would need to have an attorney present since Dr. Brunet has an attorney present. Mr. Hazelbaker asked if this meeting could lead to discipline. Mr. Weisse explained that this workplace review was simply fact-finding and a report would be sent to the Workforce Relations at campus HR. While it is possible that campus could decide to start the disciplinary process based on the report, this particular meeting does not have discipline within its scope. Dr. Brunet stated that she wanted to ensure that the words she used in this meeting are not misconstrued. Mr. Weisse offered to send notes from the meeting to Dr. Brunet so that she could ensure that what was written was accurate. If Dr. Brunet felt something was not accurate, she could let Mr. Weisse know. Dr. Brunet accepted this offer. Mr. Hazelbaker then departed and did not participate in the meeting.

Dr. Brunet and her lawyer accepted the offer of having the meeting as long as they could view and modify the report as needed so it properly reflected what Dr. Brunet had said. Dr. Brunet would like to add here that the report includes the sections of the meeting Mr. Weisse chose to report on. Dr. Brunet was never allowed to review the notes taken by the notetaker or provided a list of the questions asked at the meeting, neither prior, during or after the meeting.

Mr. Weisse claims that this meeting was fact finding. It was not. No contexts were provided for any of the questions asked so this meeting could not have been looking for any facts as Dr. Brunet often had no idea what these questions referred to.

Mr. Weisse began with the following introductory remarks:

- CALS HR has been asked to review a variety of allegations that have been made about Dr. Brunet and the Brunet lab environment. Dr. Brunet will be provided with the opportunity to hear the allegations that have been made against her and her lab environment and be able to respond and provide her side of the story.

Dr. Brunet did not have a chance to provide her side of the story for any of the allegations made against her. First, a number of questions were thrown at Dr. Brunet to answer during the meeting. It was never clarified to her that these series of questions consisted of actual allegations

made against her. Although it was indicated at the beginning that Dr. Brunet would hear the allegations made against her and her lab environment, it was never made clear to her what these allegations actually were. The meeting consisted of Dr. Brunet being asked a series of 20-30 questions. *It was never clarified that the allegations made against her and her lab environment were actually these questions.* She was never allowed to see the questions which would have been helpful especially for a non-native English speaker such as herself. Moreover and very importantly, she was never provided an opportunity to provide her side of the story because she had no idea of where these questions came from and in which context they originated. No context was provided for any of the questions. It is impossible to provide your side of the story if you do not know what the story is. Dr. Brunet was thrown a series of questions that seemed rather strange to her; she was not provided any context for any of the questions and she had no idea what these questions referred to. Under such circumstances a person cannot provide their side of the story.

- This review is not a disciplinary review and it is not part of the formal faculty discipline process under Faculty Policies and Procedures ("FPP") Chapter 9. Dr. Brunet was told that any and all of her rights as a faculty member under FPP are preserved.

It was not clear which of Dr. Brunet's rights were being referred to here or preserved.

- This CALS HR Workplace Review does not preclude the Dean or the Provost from reviewing and pursuing this matter pursuant to FPP.

Dr. Brunet does not recall Mr. Weisse mentioning anything about 'that this CALS HR Workplace Review did not preclude the Dean or the Provost from reviewing and pursuing this matter pursuant to FPP.' *It is not clear to Dr. Brunet what this statement means exactly. If she had heard this statement Dr. Brunet would have inquired further.*

- Dr. Brunet was directed to refrain from any conduct that constitutes or could be construed to constitute retaliation directed toward any employee and/or student who may have participated in this workplace review. Dr. Brunet was told she may or may not come to know who these individuals are. Regardless, she was told to avoid asking employees and/or students if they provided any information regarding this workplace review.

Mr. Weisse asked Dr. Brunet a list of questions regarding allegations that others had made about her and her lab environment. Dr. Brunet denied every allegation.

When asked about timesheets, Dr. Brunet indicated that she at times let students not work on their duties yet still claims hours to help them out. She also indicated that she did not report all the hours she worked in a week.

Responses in which Dr. Brunet expanded upon are the following:

It is incorrect to say the responses upon which Dr. Brunet expanded upon, rather these are the responses to questions Dr. Brunet was asked by Mr. Weisse to expand upon.

- When asked how a decision was made to admit a student into the program, Dr. Brunet stated that they need to be interested in the research that she does. She said she does not advertise so grad students need to come to her. She said grades are important as is scientific research, such as requirements for the department. She said she usually interviews candidates on skype. If she has money, she invites them to come on a visit. This needs to happen very quickly – usually in the winter – because they could be lured to go elsewhere. Dr. Brunet said that she will frequently be more lenient to non-white people in the types of experiences they have had. If someone was not given the opportunity to do something because they are not white, she will not hold that against them.

Mr. Weisse is putting words in Dr. Brunet's mouth, words that she did not use during the meeting. Mr. Weise is not properly relating what Dr. Brunet actually said which is better summarized below:

Dr. Brunet indicated that she does not need to advertise graduate positions in her laboratory as enough students show interest and contact her each year. She prefers students who inquire directly as it indicates that they have an interest in the research going on in her laboratory. She said she first does an interview on skype (or on the phone). If the department has funds available for graduate student recruitment, she will invite some of the top candidates for a visit of the laboratory, department and campus. She typically invites her prospective students to visit in early or mid- February because that is the period where there is an Ecology Graduate Student Recruitment on campus which permit visiting students to interact with other departments besides Entomology. Dr. Brunet indicated that, when considering minority students, she will at times accept students with a lower GPA if they have strong research experience because she believes strongly in diversity and giving people a chance.

- When asked about funding graduate students, Dr. Brunet stated she tells all PhD students that she will give them 5 years of support. This will be split between being an RA and TA. When they are an RA it is because they are on a grant that she has. If they are working as an RA on a grant, they do need to do the work that the grant states. She tries to support her students even in the summer even though she is not obligated to do so. She stated that Masters students are usually given between 2-3 years of support. She did state that, if they are hired as an RA in the summer, they do need to do the work of that grant; work averages only about 20 hours or less of work per week. Some weeks require more than 20 and other weeks require less than 20 hours.

Dr. Brunet indicated that she aims for PhD graduate students to get done within 5-6 years and Master students 2-3 years. She did not say that she promises them five years of support as PhD

student because this is done at the departmental level. She said that she has been able to support all of her graduate students to date, via a combination of RA and TAs, including summer support. If they are supported as RA on a grant that is not directly related to their research project, they do need to work for that grant for 20 hours a week (averaged over the work period).

- Dr. Brunet stated that many expectations can be found in a mentor/mentee document that she said she gives to all her graduate students. Dr. Brunet said she recently gave Dean Kathryn VandenBosch a copy of this and Mr. Weisse could ask the Dean for a copy.

When Mr. Weisse asked Dr. Brunet if he could get a copy of her mentor-mentee document, she mentioned she was leaving the following morning but she recently sent a copy of the document to Dean VanderBosch and he could ask her for a copy.

- Dr. Brunet said that she follows Ag Research Services (ARS) rules on authorship. Dr. Brunet stated that she only needs to include authorship if a person provided at least 2 of the following 4 aspects that go into a publication: Design, Information gathering, Analysis, and Paper-writing.

Dr. Brunet indicated that authorship on a manuscript in her laboratory requires significant contribution in at least two of the following four categories: Design of an experiment; Data gathering; Data analysis; Manuscript preparation for a journal.

- Dr. Brunet said that she did raise her voice at a graduate student once, but that was many years ago when she was in the Department of Horticulture. Dr. Brunet said that she recalls there was an incident but does not recall the specifics as it was a long time ago.

When talking about yelling at a student while in Horticulture, Dr. Brunet indicated that Horticulture was the most sexist department she had even been associated with, it had harmed a number of women and she could provide plenty of information in this regard and the kind of environment this created. Moreover, she also indicated that her understanding had been that all questions previously asked referred to events that had occurred while she was in the department of Entomology.

Mr. Weisse asked if there was anyone else that would be helpful for him to talk to regarding the above mentioned allegations. Dr. Brunet said that Murray Clayton, an Emeritus faculty member, would have knowledge of the lab.

When asked who Mr. Weisse could talk to about Dr. Brunet and her students, Dr. Brunet indicated Dr. Murray Clayton because she has been working with him for more than five years, meeting generally weekly during the academic year, and he has interacted and worked with many of her graduate students over the years. Mr. Weisse did not ask who he could talk to regarding the specific allegations.

Reflecting back on the allegations Dr. Brunet denied, Mr. Weisse asked Dr. Brunet if she had any thoughts as to why these types of allegations would be made about her and the lab if they were untrue? Dr. Brunet said she was not sure. She said she did know of one employee who was a bit unusual that she recently had to kick out of the lab because he held a [REDACTED] in the lab while he was working at night. Besides that, she was unsure.

Mr. Weisse asked if she had any idea who could have made such allegations. He did not say. 'Reflecting back on the allegations Dr. Brunet denied, Mr. Weisse asked Dr. Brunet if she had any thoughts as to why these types of allegations would be made about her and the lab if they were untrue?' Dr. Brunet actually said she did not know. She indicated there was one person she could think of that was recently mad at her for asking [REDACTED] to leave the office in her laboratory where [REDACTED] was having a [REDACTED] with people that were not permitted access to the building in the evening (it was around 7:00-7:30 p.m.). Dr. Brunet found [REDACTED] and two other unknown male individuals in the office in the back of the laboratory one evening returning from a WISE dinner. She asked them what they were doing and they indicated they were having a meeting about [REDACTED]. She indicated that this was not the place for such a meeting and politely asked them to leave the office. She escorted them to the first floor and then left the building. Dr. Brunet never said that this person was kicked out of her laboratory because [REDACTED] had a [REDACTED]. That person was politely asked to leave the office and was escorted out of the office by Dr. Brunet that evening.

At the conclusion of the meeting, Mr. Weisse asked Dr. Brunet not to share information about this review with others who currently work in the lab or who may have worked in the lab in the past, including both employees and students. Mr. Weisse also reiterated that Dr. Brunet is not to retaliate against anyone involved in this workplace review process. Retaliation is strictly prohibited. Any reports of retaliation will be reviewed and shared with appropriate campus offices for follow up. Mr. Weisse concluded by stating that, if Dr. Brunet thinks of anything else she wants to add to this workplace review she should contact Mr. Weisse within the next 7 days. The meeting ended at around 3:10pm.

A Dr. Brunet contacted Mr. Weisse the day he sent the report and indicated that the report did not reflect what she had actually said and asked him to modify a number of the statements made in this review as he had agreed with before this meeting started. Dr. Brunet only accepted to meet if she could modify the report as needed to reflect what she had actually said. In an email exchange following receipt of the report from Mr. Weisse, Dr. Brunet asked for a copy of the notes taken during the meeting (twice) but her request was ignored by Mr. Weisse. Dr. Brunet would also like to get a copy of the questions that were asked to her during the meeting. This report is making Dr. Brunet question whether this current investigation represents retaliation against Dr. Brunet.

People to contact- Brunet

Current lab members

[REDACTED]
[REDACTED] ([REDACTED]) [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]

Undergraduates currently in the lab.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Faculty

Murray Clayton mkclayton@wisc.edu

Molly Jahn (former dean of CALS) molly.jahn@wisc.edu

Brunet- Letters of recommendation

Undergraduate students

██████████ 1
██████████ 2
██████████ 1
██████████ 1
██████████ 4
██████████ 3
██████████ 2
██████████ 6
██████████ 9
██████████ 4
██████████ 2
██████████ 1 letter going to all medical school applications
██████████ 5
██████████ 13 (including Master and PhD programs)
██████████ 1 letter going to all medical school applications
██████████ 2

Graduate Students

██████████ 1
██████████ 5
██████████ 1
██████████ 4
██████████ 4
██████████ 1
██████████ 14
██████████ 3

Postdocs

██████████ 3 (including current job)
██████████ 1 (postdoc in ██████████)
██████████ 1 (postdoc in ██████████)

Plat

COLLEGE OF
AGRICULTURAL
& LIFE SCIENCES
UNIVERSITY OF WISCONSIN-MADISON

Department of Entomology

From

*Dr
Brunet*

3/16/18

*Ag has
(have copy
only)*

March 13, 2018

Dear Provost Mangelsdorf and Vice Provost Bernard-Donals,

I was recently given a letter indicating the temporary suspension of my ability to accept new graduate students in my research program. This outcome appears to have been triggered by an original complaint of [REDACTED] who claims that I provided a hostile environment in my laboratory. This was followed by an investigation by CALS regarding this issue. I would like to address these two points in turn.

First, the complaint made by [REDACTED] that I created a hostile environment in the laboratory. This originated, from what I now understand, by a series of emails and complaints made by [REDACTED] to my chair, Dr. Susan Paskewitz, and to [REDACTED] committee members. My chair, unfortunately, never checked with me or other members of my laboratory about the validity of the allegations made by [REDACTED] in these emails. She likely listened to [REDACTED] a disgruntled and, I believe, troubled [REDACTED] in the laboratory at the time, who was complaining mainly because I had made some suggestions on how [REDACTED] could improve [REDACTED] work performance and habits. There were, however, four other people in the laboratory at the time plus a few undergraduate students that could have shed some light on the situation. They were never consulted. Conveniently, [REDACTED] claimed that if I were consulted [REDACTED] was afraid I would not [REDACTED] and that other employees feared retaliation. The alternative explanation to consider is that if I or other members of the laboratory were consulted, the truth would come out, and [REDACTED] allegations would no longer hold. But Dr. Paskewitz never bothered to consider this possibility, in part because she has always been extremely biased and prejudiced against me. This is rather unfortunate because it would have become quickly evident that these accusations were lies.

Based on [REDACTED] allegations, [REDACTED] was convinced to [REDACTED] laboratory [REDACTED] and CALS started an investigation about hostile environment in my laboratory. The procedure used by CALS during this investigation has been truly astounding. I was, from the beginning, believed to be guilty and the goal of the investigation has been to accumulate whatever piece of evidence they could use to affirm this position, irrespective of how much things had to be distorted or put out of context in order to fit their objective. Mr Weisse's views were extremely biased as I attested first hand when I read his summary of my own interview. This strong bias was further confirmed when I read the report of his investigation, where lies abound and statements are taken out of context. His report also states that I deny specific allegations while these were never presented to me and I was never provided a chance to explain specific allegations during the interview process.

This has now gone to the Provost and I am informed that a fair investigation is about to start and there is a threat that I could be dismissed from UW as a faculty member. Nobody is perfect and perfect I do not claim to be. However, I am appalled at how far this process has gone. Claims of

bullying, discrimination and hostile environment can be made here but who these are directed towards should be reconsidered. The reason I have not come forward prior to now with this information is that I have been kept completely in the dark about what was going on; was never consulted or asked about my version of any of these events, and it is only very recently that I was provided some information that helped me piece together the course of events and helped me better understand what has been going on. Although I am rather doubtful at this point about the prospect of any fair investigation, I thought it was important that my voice be heard. Moreover, given the way this whole process has been handled so far, I would like to request that, if you do bother with another investigation, that it starts afresh by first examining the validity of the claims made by [REDACTED] and how the situation was handled by my chair, Dr. Susan Paskewitz, as this was used as the basis for the rest of the process.

Johanne Brunet

Johanne Brunet
Professor
1-608- 265- 3587 (Office)
jbrunet@wisc.edu

March 21, 2018

Hi Ann,

At our first meeting last Friday March 15, you asked me for a copy of my CV. I had to update it and I am attaching a copy to this email. To help with all the information you have to sort through, I am briefly summarizing our first meeting. Prior to the meeting I emailed you a copy of the document I provide to all my graduate students when they join the laboratory which explains the mentor-mentee relationship. At the meeting, I provided you with a copy of the letter I sent last week to Provost Mangelsdorf and the Vice Provost Bernard-Donals. I also gave you a copy of Mr. Weisse's (CALS HR) summary of my interview with him and my response to his summary as I considered he had strongly distorted the facts and what I had said. Moreover, I indicated that my side of the matter was never heard or asked for at any point during that interview or at any point during this whole process. Mr. Weisse also added to his final report that I denied specific allegations while these allegations were never mentioned during the interview. In fact at no point during this entire process was I or other members of the laboratory, besides [REDACTED] [REDACTED] and [REDACTED] the two people who complained, asked about what was going on in the laboratory at the time or asked for our version of events.

At the meeting you explained that you were going to interview all the people interviewed by CALS and asked them if they had anything to add. You also mentioned that you would talk to faculty in Horticulture and in Entomology. You indicated that I could provide you with questions you could ask the persons you will interview. I am providing some questions below.

Faculty in general

1. Have you ever witnessed negative interactions between me and my lab. members?
2. Could you provide some specifics and a time frame?
3. Have you approach Dr. Brunet about the alleged situation to make sure she was aware of how someone felt? Or that something was going on?

- [REDACTED]
1. Did Dr. Brunet say your brother was stupid or did she say that staying in his house was a dumb thing to do?
 2. Did you ever mention or discuss with Dr. Brunet [REDACTED]?
 3. Did Dr. Brunet ever promise you [REDACTED]? Isn't [REDACTED] discussed every summer prior to the Fall semester in the laboratory for each [REDACTED]?
 4. Is support after [REDACTED] ever promised/ensured to [REDACTED] in the department? Did Dr. Brunet ever promise to cover you past your [REDACTED]? Besides saying she would do her best.
 5. Did you agree to take [REDACTED] with [REDACTED] after Dr. Brunet explained that you would need to work the hours on a project and not [REDACTED] as this was [REDACTED]?
 6. Did you not select yourself to work 28 hours a week so you would have some time to work [REDACTED] [REDACTED]? Therefore assuming that you understood the situation.

7. Did you not tell Dr. Brunet that you were very happy with the situation i.e. working for [REDACTED] [REDACTED]?
8. Did you have a meeting with Dr. Brunet where she told you she had to select the two manuscripts she would complete for publication and asked if you wanted her to pick two of [REDACTED]? She had other manuscripts she could also select but she thought this would be helpful to you and was willing to do it.
9. Did you have a full version of the [REDACTED] chapter when Dr. Brunet started working on it to get it ready for publication? With all sections, references, figures? If so could you please send me a copy of this document?
10. You claim Dr. Brunet made you work 40 hours a week on her projects. Was she not writing two of [REDACTED] chapters for you and you were helping provide some minor analyses when needed and quality figures? Did you not use these manuscripts as chapters [REDACTED]?
11. Did Dr. Brunet tell you and is it not written in the [REDACTED] that she has many obligations and needs 2-3 weeks before she can return a document, especially if it requires major editing?
12. Did you send the final version of the chapters to the committee the first time around? Did Dr. Brunet simply asked you to send the final version of the two manuscripts [REDACTED] indicating that if the committee sent comments it would be best to have comments on the final version?
13. Did Dr. Brunet ask you whether it would be all right if she corrected your pronunciation of some technical terms to help you when presenting your work? And you agreed?
14. Did you ever mention to Dr. Brunet that you did not like her correcting mispronounced scientific terms? even if you agreed earlier that it was all right for her to do so?
15. Could you specify what specific rude comments Dr. Brunet ever made about your accent?
16. Are you claiming that the five other people present at that meeting, besides Dr. Brunet, all confirmed that she said that your brother was stupid?
17. In all your interactions with Dr. Brunet over the summer and Fall months [REDACTED], were you not cordial and in a good mood and did you not discuss and agree with her about the procedures that were followed?
18. Did you ever discuss your frustrations or indicated that something was not to your liking with Dr. Brunet?
19. Does her mentor-mentee manual indicate that she cannot read minds and therefore may not be aware of an issue if it is not brought to her attention?
20. Did Dr. Brunet tell you that you only got in to UW because you were a minority or did she indicate that because she believed in diversity she may have put more weight on your prior research experience than on your grades when deciding to accept you into her research program?
21. Did Dr. Brunet support you [REDACTED]? And was quite understanding of the situation?
22. Did Dr. Brunet defend you with Academic Affairs when they refused to accept your credits from [REDACTED] as equivalent to credits from other US University?

23. Were you not always cheerful and positive in your interactions with Dr Brunet? Would you have expected her to figure out you [REDACTED]?

- [REDACTED]
24. When joining the laboratory did Dr. Brunet explain to you that if you chose to work on a project of your choosing for which she did not have direct funding she would not be able to support you [REDACTED]?
25. Did she not explain that she would try her best to occasionally put you [REDACTED] when she needed extra help on one of her grants but you would have to help with the grant project?
26. Did you not still choose to work on your own project after Dr. Brunet made these conditions clear to you?
27. Did Dr. Brunet fund your research project (supplies, greenhouse rental etc..) although she had explained to you when you started that she may not be able to do so?
28. Similarly, did Dr. Brunet not explain that she would be able to provide summer support if you helped in the field on the project that was funded by a grant but could not otherwise provide summer support?

- [REDACTED]
29. A student claims having made one navigational error and that I belittled [REDACTED] the whole way back. Was it not true that we got lost a number of times on the way to our destination so much so that we ended up in a different state? and Dr. Brunet had to call her host to figure out how to reach her destination and we got there over an hour late? Was it true that Dr. Brunet needed directions on the way back and that you agreed to act as the navigator before we left for our return trip? That she did not belittle you but still needed you to provide directions so she could find her way home? Did you mention to Dr. Brunet at any point during that trip that you would prefer no longer providing directions?
30. Which committee meeting did Dr. Brunet make rude comments about you? What did she say exactly? Did the other committee members react or say anything or even noticed? Did anyone mention something to Dr. Brunet about this so she would be aware of how you felt?
31. Did Dr. Brunet tell all of her students to give her 2-3 weeks to review documents?
32. Did you come Dr. Brunet one day out of the blue to let her know that you had been accepted in [REDACTED] and wanted to [REDACTED]? Did Dr. Brunet indicate that you could leave but in order to [REDACTED] you had to complete at least some of the experiments we had agreed upon [REDACTED]? While the original plan was to use and compare [REDACTED], did Dr. Brunet not agree to drop all work related to [REDACTED]?
33. Doesn't Dr. Brunet submit the papers as was suggested to her in the past by her research leader Philipp Simon as this is the practice he follows?
34. [REDACTED] and [REDACTED]: Did you ever express your feelings or unhappiness to Dr. Brunet so she would have an idea of what was going on?

35. Regarding the luggage, was this not a joke Dr Brunet was making about herself at the time?
36. Did Dr. Brunet have any idea that you were [REDACTED]? Did you mention anything to her?

- [REDACTED]
37. Was this incident extensively reviewed by CALS at the time and the specific allegations as made here denied and corrected? CALS also indicated that this event was now resolved and close and would never be brought back.
38. Did Dr. Brunet approve to pay some of the expenses for your trip but not the expenses of a second person that was accompanying you but was not from the laboratory or working on the project?

- [REDACTED]
39. Did each student work on the field project covered by the grant in order to [REDACTED]? Did you not inform Dr. Brunet that you had [REDACTED]? And that you were not going to work in the field?
40. Could you explain what that work entailed exactly? Were you working on one of Dr. Brunet's grant that Spring? Did Dr. Brunet not simply indicate that [REDACTED] is a lot of work and it is normal to work more than 20- 40 hours a week? Did you yourself [REDACTED] and imposed these deadlines upon yourself? Despite the fact that Dr. Brunet warned you it would be a lot of work.

- [REDACTED]
41. Not enough information is provided for Dr. Brunet to figure out what this referred to. However, how can Dr. Brunet promise 1st authorship when someone does not write the manuscript? Or at least gives it a good try?

- [REDACTED]
42. For the journals that Dr. Brunet submits to, doesn't the person that submits the paper gets the comments back from the journal? If the paper got accepted the comments came back to the person who submits so you must have had to communicate about it with Dr. Brunet?

- [REDACTED]
43. Are you aware that as an ARS employee cannot put her [REDACTED] on manuscripts without the [REDACTED] having done more than collecting data? That she must also ask for prior permission to the agency to put a [REDACTED] on a paper. Collecting data is not considered a sufficient reason for putting a [REDACTED] on a manuscript by USDA-ARS and is typically not accepted.

44. Did the [REDACTED] for while not engage [REDACTED] [REDACTED]? Did Dr Brunet not withhold their salary while the process was under investigation? Given that the government is self-insured? Were you not part of this incident and supervising the students at the time of the incident?
45. Who was [REDACTED] exactly? An undergraduate, graduate? Applying from [REDACTED]? Dr. Brunet has had [REDACTED] working in the laboratory so she has no idea where this comes from.
- [REDACTED]
46. Regarding hours and being 100%, did Dr. Brunet not tell you to do this following directives she received from USDA-ARS as she indicated at the time?

Paskewitz

47. Did you ever mention to Dr. Brunet that some of her graduate students were complaining to you about something? Her behavior?
48. Did you approach Dr. Brunet at any time, for either [REDACTED] or [REDACTED] or any body else working in the lab to indicate that there were issues? Or to ask about what was going on and what Dr. Brunet side of a story might be?
49. Did you encourage and help [REDACTED] apply to the [REDACTED]?
50. Did you encourage [REDACTED] to [REDACTED] the week prior to his [REDACTED]?
51. Did you offer any monetary support to [REDACTED] when discussions of support took place over the summer and where Dr. Brunet indicated not having UW funds to cover him? Although such funds were available?
52. Did you call Dr. Brunet to your office on a Friday when prospective students were visiting last year and harassed her until she broke down in tears? And then offered her a box of tissue and then left your office to go to Friday Swarm? All Dr. Brunet had done was send an email to graduate students indicating that if they had complaints about not receiving email notice of seminars they should direct them to the other two people in charge of the seminar because she had been sending email announcements for the speakers she was in charge of?
53. Did you, last year, provide an evaluation [REDACTED], for Dr. Brunet evaluation [REDACTED] [REDACTED] but did not inform her you were going to take such action?
54. Did you this year provide a [REDACTED] for Dr. Brunet although teaching is not part of her responsibilities?
55. Did you not [REDACTED] although she did provide her 2016 report together with her 2017 report? Did you still [REDACTED] for 2016 when averaging the two years?

56. Did you this week 03/20/2018 send a mass email to the entire Entomology department indicating that Dr. Brunet was under investigation although this matter is supposed to be confidential? And hence requires discretion.

- ██████████
1. During field season, did you decide that some hypothesis you came up with was very high priority and without discussing it with Dr. Brunet tried to convince the crew to modify the procedures for data collection?
 2. Did the fact that you did not think Dr. Brunet gave enough attention to your hypothesis lead you to accuse her of research misconduct? What role did it play?
 3. In the fall what time did you come to work? When did the other members of the lab. come to work?
 4. Did Dr. Brunet ask you to come to the laboratory during more diurnal hours during the fall? Especially given you had to do it all summer for field work so you were now accustomed to it?
 5. How did you respond to Dr. Brunet's request?
 6. What was your title in the laboratory?
 7. Did you frequently and without warning leave work in order to have some ██████████ or simply to go help your former PhD advisor or some other activity?
 8. What is your current position?
 9. Did you accuse Dr. Brunet of being a nazi because she asked you to set up traps in the field because some rodents were eating the experimental plants?
 10. Did she tell you that such comments could easily be perceived as antisemitic and that she would not tolerate such attitude in her laboratory?
 11. Did you come up to Dr. Brunet one day and tell her that she needed therapy?
 12. Did you tell Dr. Brunet that you had problem with authority?
 13. Was it difficult to deal with when she asked you to do specific tasks?
 14. Is it difficult for you when people question or challenge your ideas?

April 10, 2018

I am providing below some responses/ context to the allegations made in Mr. Weisse's report. I have previously claimed that Mr. Weisse strongly distorted facts and put words in my mouth when he summarized my interview. I have provided both his summary of my interview and my comments on his summary to the Provost, Vice provost for Academic Affairs and to Dr. Ann Palmemberg who is in charge of the current investigation. As I expressed in that same letter, Mr. Weisse's final report also distorted facts and situations to fit his goal which was to determine that there was a hostile environment in my laboratory. In addition to distorting the facts and situations, there was never any intent of verifying the veracity of facts or allegations made, or of presenting a balanced view of the situations. Dr. Palmemberg met with me on April 30 to discuss Mr. Weisse's investigation. She confirmed to me that the sole purpose of the investigation was to gather evidence that my laboratory presents a hostile work environment. This exchange with Dr. Palmemberg confirmed to me what I had suggested earlier. Dr. Brunet resents the false allegations made against her and obvious distortions of facts and events presented in Mr. Weisse's report. This report is the only information that has been provided to Dr. Brunet by UW with respect to this investigation.

Abusive expression:

□ ■■■: "Dr. Brunet said that the only reason I got into UW-Madison is because I am a minority."

Dr. Brunet did not say that a student only got in to UW because ■■■ was a minority. She might have mentioned that, because she believed in diversity, she may emphasize prior research experience relative to grades when deciding to accept a minority student into her research program.

□ ■■■: "Dr. Brunet said 'Your brother must be stupid.' ■■■ all witnessed this.

Dr. Brunet did not say "your brother must be stupid. Dr. Brunet asked about the student's family because she was concerned about their well-being. Dr. Brunet presumes that Mr. Weisse is implying that ■■■ were present when this exchange occurred and not that they concurred with the statement.

□ ■■■: "On the way back from a conference I made a navigational error and for the entire 4 hour trip back Dr. Brunet kept belittling me, telling me that I am so bad at this. I felt trapped and couldn't get out of the situation."

Dr. Brunet presumes that this refers to a trip where, due to the directions provided by a student, we got lost a number of times and ended up in a different state on the way to our destination. Dr. Brunet had to call her host to figure out how to get back on track and arrived about 60-90 minutes late to the destination. On the way back, Dr. Brunet should not have let the student provide directions but she did not want to offend the student so let ■■■ give directions. We got lost again on the way back. Dr. Brunet did not belittle the student; she asked for needed directions to find her way back home, not being familiar with the route.

□ ■■■: "Dr. Brunet would make rude comments about my accent." ■■■ and ■■■ witnessed comments similar to this.

No specifics are provided as to what constitute "rude comments" about an accent. Dr. Brunet did correct the pronunciation of a few technical terms for a student to help ■■■ when ■■■ did scientific presentations. She had checked with the student first to make sure it was fine with ■■■ for her to do so.

☐ [REDACTED]: "When I had a committee meeting, Dr. Brunet was usually rude and would put me down in front of the committee." Dr. Brunet denied engaging in any abusive expression.

Dr. Brunet does not recall ever being rude or putting one of her students down in front of a committee or under any circumstances. No committee members or students have ever indicated to Dr. Brunet that she exhibited such a behavior either. Dr. Brunet has served on a large number of graduate student committees and has never been criticized for being rude to a student.

Unwarranted Physical Contact:

☐ [REDACTED]: "I didn't know what I was looking for and Dr. Brunet scolded me for this. She then physically slapped my hand; not hard, but enough to get my attention. It was emotional that she physically touched me in a negative way."

Dr. Brunet has no idea what this is referring to.

☐ [REDACTED]: "Dr. Brunet then grabbed my shoulders and shook me violently, screaming at me to pay attention."

There was an incident in [REDACTED] about [REDACTED] where Dr. Brunet did raise her voice at a student. She did not, however, shake the student violently. This incident was extensively reviewed by CALS at the time and CALS also indicated that this event was now resolved and Dr. Brunet understood at the time that it would never be brought up again. This was an isolated incident. Dr. Brunet was assistant professor in Horticulture at the time, a department that expressed very strong bias against its few women faculty and offered an extremely unsupportive environment. Moreover, it later came to Dr. Brunet's attention, that this event was blown out of proportion and used to spread bad rumors and to denigrate Dr. Brunet's character fairly widely over the campus community.

☐ Dr. Brunet denied engaging in any unwarranted physical contact.

Abuse of authority:

☐ Pattern of making it difficult for student to finish program:

o Funding related:

☐ [REDACTED]: "In June of the last year of my program, while attending a conference, Dr. Brunet out of the blue told me that she would not have money to pay me in the fall. I protested, stating that I had already [REDACTED] [REDACTED] and that I needed the money and also the health insurance. She said that perhaps she could find funding for job on the USDA side, but I would need to work for it and it would not include insurance."

The student was supposed to be done during the summer months and funds were not available for the student to [REDACTED] in the fall. This did not come out of the blue. Dr. Brunet was surprised to hear the student had [REDACTED] early in the game if [REDACTED] thought [REDACTED] was not going to be done over the summer. The only way Dr. Brunet could think of funding the student was if [REDACTED] wanted to work as a [REDACTED] but that meant [REDACTED] would have to work on the project this was funded from. The student accepted this position and selected to work 28 hours a week for this position with the understanding that [REDACTED] had to work on the grant project during that time and there would be no health insurance if [REDACTED] worked part-time.

□ [REDACTED]: “In the summer months, after finishing a position [REDACTED], Dr. Brunet would put us on [REDACTED] for the summer. While [REDACTED] that last summer, at the end of the month I did not receive a stipend. When I sent an email to Dr. Brunet that I did not receive my stipend, she simply replied back, ‘correct.’ When I replied back stating that I did not understand, she simply replied back with ‘I guess we have a misunderstanding.’”

This statement is incorrect. Many of Dr. Brunet’s students had selected to work on research projects not funded by her grants. She put them [REDACTED] during a semester when she could and they helped with work related to a funded grant. In the summer, Dr. Brunet offered [REDACTED] to the students who helped with her funded grant related field work project. This was the case every summer funding was available to pursue the field work. If a student tells Dr. Brunet they are not working in the field and [REDACTED] that summer then Dr. Brunet understands that they have found alternative source of funding for the summer. This was the case here.

□ Dr. Brunet stated that she did not improperly stop funding students.

o Giving extra work when [REDACTED]:

□ [REDACTED]: “When I started [REDACTED] in my last year, Dr. Brunet gave me many hours of work not related [REDACTED] so I hardly had time to work on my own project. I was working 40 or more hours per week on her projects so it was very difficult to get [REDACTED].”

Dr. Brunet assumes this person was working for [REDACTED] at the time, a position [REDACTED] accepted with the understanding of what that position entailed and that [REDACTED] chose to work 28 hours a week. Dr. Brunet was actually working on two manuscripts for publication for that student and required some help from [REDACTED] for minor data analyses and figures. These chapters were not ready for [REDACTED] when Dr. Brunet started working on them. The student ended up using these manuscripts as chapters [REDACTED] so Dr. Brunet did end up pretty much writing these two chapters for [REDACTED]. It is therefore questionable who was working more than 40 hours a week for whom here.

□ [REDACTED]: “Near the end of my program, Dr. Brunet gave me a large amount of work not related [REDACTED]. I was working about 90 hours a week. when I went to Dr. Brunet to voice my concern that I was being overworked and not given enough time to work on my paper, she simply replied ‘Good. That’s how you should be feeling.’”

As explained above, for students who chose to do research on unfunded research projects, Dr. Brunet [REDACTED] some semester when she could (she recently found out this may be classified [REDACTED] but was not aware of this distinction at the time). The student then helped for an average of 20 hours a week on a funded research project. This was understood by the students. This student [REDACTED] that was very tight and Dr. Brunet indicated that this deadline would be difficult to meet. The student chose to keep this schedule. It implied there would be a lot of work to complete in a short time frame. This was not Dr. Brunet’s choice but if the student wanted to try to meet that deadline she would not stop [REDACTED]

☐ [REDACTED]: "During the summers she would have us work in the field observing bees 40-50 hours per week. I had very little time to do my own research."

Bees are mostly active in the morning so the hours were more 20-30 hours a week and only for 1.5 months out of 3 (early July to mid-August). Students had the rest of the time to work on their own research.

☐ Dr. Brunet denied giving extra work when students were [REDACTED]
[REDACTED]

o Refuse to review papers:

☐ [REDACTED]: "When I finally found time to write the first two chapters [REDACTED]
[REDACTED], I sent them to Dr. Brunet to review. She said that I should get it to someone else to review as she didn't have time. I begged her to review as she was the one that really knew what I was working on. She said she was too busy."

Dr. Brunet has made numerous revisions on chapters from all of [REDACTED] and she has the computer files to show it. Dr. Brunet may have suggested that the student shared chapters with someone in the laboratory for comments first as it is good practice for all involved.

☐ [REDACTED]: "When I had [REDACTED], I would ask Dr. Brunet to review it. Dr. Brunet would reply back that she didn't have time to read the paper."

Dr. Brunet has many obligations and what she tells the students (and this is indicated in her [REDACTED]
[REDACTED]) is that she needs 2-3 weeks to return a manuscript, especially if it requires significant comments/changes. She might have said she would not have it back the week it was given to her but she would never have said that she would not read the manuscript. She has computer files indicating her comments on [REDACTED].

☐ Dr. Brunet denied that she refused to review students' papers.

o Changed expectations:

☐ [REDACTED]: "I wrote two chapters [REDACTED]. Dr. Brunet decided to have these two chapters published, so she worked with me to get them published. After submitting these for publication, I sent them to my committee as the first two chapters [REDACTED]. However, Dr. Brunet sent an email to the committee stating that [REDACTED] could not submit those chapters [REDACTED]."

The student had not completed two chapters [REDACTED] when Dr. Brunet started working on these to prepare them for publication. She has the computer files the students sent to her at the time. Dr. Brunet did major revisions to the manuscripts when preparing them for publication. Given all the changes she had made, she did ponder whether these manuscripts should be used [REDACTED] chapters. The email Dr. Brunet sent to the committee referred to the fact that the student had not sent the final version of these manuscripts to the committee. Dr. Brunet mentioned to the student at the time that it was not useful to have comments from the committee unless they were done on the last version. Dr. Brunet did not understand why the student had sent the version [REDACTED] sent to the committee. Dr. Brunet was

therefore asking the committee members not to bother reading this version of the manuscripts because they were not the final version of the manuscripts and asked the student to send the final version of the manuscripts for review.

□ ■■■■: “Dr. Brunet was constantly changing her expectation of what research was needed. I would finish an experiment and think it was enough, but Dr. Brunet would state that I needed more... in the end, after calling my committee to discuss, my committee agreed with me so I was able to finish my degree.”

Dr. Brunet thinks this statement refers to a student that came to her out of the blue and told her that ■■■■ had been accepted in the ■■■■. The student had barely completed any of the experiments ■■■■. Dr. Brunet told the student that if ■■■■ wanted ■■■■ ■■■■ would need to complete at least some of the experiments that were part of ■■■■. Dr. Brunet accepted to drop all experiments linked to ■■■■ that were in the original research plans to make it easier for the student to finish. Because of these changes, it was decided to meet with the committee so they understood what was going on. It was not a question of whether the committee agreed with the student or with Dr. Brunet but of the committee being informed of the changes and agreeing on expectations.

□ Dr. Brunet stated that if her expectations changed it was to drop expectations. She denied adding additional expectations.

□ Authorship issues:

o ■■■■: “I conducted research and collected data on a research project and was promised 1st authorship. When the paper was submitted, I was not put as first author and was not told of this.”

Dr. Brunet does not know the specifics this is referring to but first authorship implies that a student ■■■■ takes the lead in writing the manuscript. It is never simply “promised”. If the person was not first author it indicates that this did not happen or that the manuscript and data analyses required substantial reworking not performed by the person in question.

o ■■■■: “After conducting research, collecting data, computing result and writing a paper, I submitted it for publication. After I left the lab, it came back as accepted but needing revisions. Dr. Brunet made revisions and changed authorship to herself and did not tell me about this change in authorship.” ■■■■ witnessed this.

For the journals Dr. Brunet submits to, when a paper is submitted by an author, then this author gets the comments from the reviewers and deals with the journal. Dr. Brunet is not sure what this statement refers to as the person in question would have received the revisions and been in charge.

o ■■■■: “After an incident with Dr. Brunet, she told me “I will be very selective with whom I put on papers.’ Dr. Brunet then left me off of the authorship of all papers even though I had contributed to the research of them.”

Dr. Brunet is not permitted to put ■■■■ on manuscript unless they have done way more than simply collecting data. Every time she adds ■■■■ on a paper she needs to write a justification and

get permission from the USDA-ARS. Collecting data is not considered a sufficient reason for putting a [REDACTED] on a manuscript by USDA-ARS and is typically not accepted.

o [REDACTED]: "After [REDACTED], even though Dr. Brunet stated that my research was not very good, she told me I should work on getting it published, then stated 'Just to be clear, it will be me who will submit this paper.'"

Dr. Brunet tends to submit papers; this practice was suggested to her by her ARS research leader, Dr. Philipp Simon, as this is the practice he follows. Dr. Brunet would not have said research was not very good as she supervises her students and makes sure the research is sound.

o Dr. Brunet stated that authorship could be changed if a major re-write occurred; however, she stated she has not done this at UW. Dr. Brunet stated that she follows Ag Research Services (ARS) rules on authorship, stating that one needed be included if a person provided at least 2 of the following: Design, Information gathering, Analysis, paper-writing.

Dr. Brunet did not state that major re-writes have not occurred at UW. She does her best to follow ARS rules on authorship.

☐ Threat to not pay people what was promised or earned:

o [REDACTED]: "[REDACTED] attended a trip with a lab member. When it was time for them to get paid for their time, Dr. Brunet refused to pay. The [REDACTED] student's [REDACTED] came to Madison and needed to talk to a few people in order for Dr. Brunet to pay them."

The statement above omits the fact that the [REDACTED] students in question (together with [REDACTED] in the vehicle if I recall) [REDACTED]. Dr. Brunet was investigating this situation which was complicated by the fact that the government is self-insured so it was not clear how to deal with this. Dr. Brunet decided to hold a pay period salary while the investigation was going on. The students eventually got paid and this was not because they talked to people so Dr. Brunet would pay them as suggested above. Dr. Brunet was not aware that the [REDACTED] came to Madison to talk to people.

o [REDACTED]: "I planned a research trip and had the trip approved by Dr. Brunet. After the trip, I submitted everything to get reimbursed, but Dr. Brunet did not approve everything. I ended up paying about \$800 out of my own pocket."

Dr. Brunet approved some expenses for the person going on the trip. She did not approve expenses for other people unrelated to the project that decided to accompany this person on the trip. This was all explained to the student before the trip.

☐ Asking those under her to lie on their timesheet:

o [REDACTED]: "Dr. Brunet asked if I would go to 100%. When I said I would, she told me to not put the extra hours on my timesheet. Rather, I should just bank these hours and put them on my timesheet when I was not working."

Dr. Brunet thinks this refers to a situation where she was instructed to do so by ARS HR while paperwork was being processed to transfer the person in question to fulltime.

o Dr. Brunet stated that the only time she asked someone to lie on a timesheet was to add time to a timesheet for work spent on their thesis instead of spent doing ARS work.

Related to race/nationality:

o [REDACTED]: "Dr. Brunet would make rude comments about my accent." [REDACTED] and [REDACTED] witnessed comments similar to this.

This is a very general statement. Dr. Brunet has an accent herself so would not make rude comments on accents. She may at times have corrected pronunciation of scientific terms to help a student, after having obtained permission from a student to do so. It is not clear what these people witnessed exactly.

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Investigative Report re: Dr. Johanne Brunet, Ph.D.

12/1/2017

o [REDACTED] "When [REDACTED], while attending a lab meeting, I told the lab members that my brother stayed in his house. Dr. Brunet said 'Your brother must be stupid.'" [REDACTED] all witnessed this.

This statement is inaccurate. All the people mentioned would not agree with this statement. Mr. Weisse likely implied that these people were present at an event and not that they agreed with the statement.

o [REDACTED] "When selecting grad students, Dr. Brunet chose not to [REDACTED] [REDACTED] because [REDACTED] and if there was a problem, I wouldn't be able to trust her to tell me."

Dr. Brunet has no idea where this statement comes from. She has [REDACTED] in the laboratory.

o [REDACTED]: "When Donald Trump was elected, Dr. Brunet told [REDACTED] 'You better have your bags packed in case you need to move in a hurry.'"

Dr. Brunet likely was making a joke about herself here as she was born and raised in a different country and this thought had crossed her mind at the time. She was the only person in the laboratory at the time with a different country she could move to; this joke only applied to her.

o Dr. Brunet denied all of the above.

[REDACTED] of those affected:

☐ [REDACTED] and [REDACTED] both stated that due to the treatment they received from Dr. Brunet, [REDACTED]

Dr. Brunet was not aware of any of her students having [REDACTED]. She is outraged by the statement made here that such thoughts from the students resulted from treatment received due to her. These accusations are totally unfounded and reflect the extremely biased and unfair nature of Mr. Weisse's investigation. One of these students was always cheerful when interacting with Dr. Brunet and exhibited no signs [REDACTED]. The second student did not exhibit any such signs either. Suggesting that [REDACTED] resulted from treatment received by Dr. Brunet is a very strong and outrageous statement and no evidence is presented to support such a statement. Dr. Brunet strongly resents such accusations.

Many others have witnessed the aftermath of some of the above events, such as when the witness went to them after an event to voice their concerns, vent their frustrations, or just needed a shoulder to cry on. I have not included these in the above as the witness was not a first-hand witness.

It is interesting that none of the incidents alleged above were ever mentioned to Dr. Brunet. This makes Dr. Brunet question the integrity of the people whose shoulders her students supposedly went to cry on or vent to.

There were also reports of [REDACTED], which I will not include in this report as it is out of scope for this investigation and have forwarded to [REDACTED].

Dr. Brunet resents such unfounded accusations.

Finally, a number of people have either stated or acted in a way in which they were nervous to disclose anything for fear of retaliation from Dr. Brunet.

Dr. Brunet would like to be presented with any instances where she has 'retaliated' against someone.

Conclusion

This report concludes the investigation.

Ben Weisse

CALS HR Manager

April 12, 2018

Dr. Brunet is rebutting below statements made in some emails from Dr. Paskewitz that were recently shared with her. The emails are copied at the end of this document. These emails provide some insights on the type of evidence used by Mr. Weisse's during his investigation.

Rebuttal to Dr. Paskewitz's emails

Email of September 24, [REDACTED] to Phil Simon, Richard Straub and Benedict Weisse

Dr. Paskewitz claims that I belittled and made fun of [REDACTED] family in [REDACTED] in front of witnesses. There were indeed four witnesses besides [REDACTED] and [REDACTED] at that meeting. Dr. Paskewitz never asked any of them about the incident to confirm whether what [REDACTED], and I presume [REDACTED], was (were) saying was true. If she had she would have found out that I did not belittle or make fun of [REDACTED] family; I was actually quite concerned about their well-being.

I cannot comment on the letter Dr. Paskewitz is talking about as I have no idea what this is about. I find it interesting however that Dr Paskewitz finds the need to refer to such a letter here.

Dr. Paskewitz claims that I ordered [REDACTED] to work on papers during [REDACTED] free time for me to submit to USDA as a requirement. She claims that I mentioned that two of [REDACTED] chapters were ok for [REDACTED]. I would like to see this email as the chapters I received from [REDACTED] were not ready for [REDACTED]. I did send Dr. Paskewitz and the other committee members the versions of the chapters that [REDACTED] provided me when I started working on them to prepare them for publication. I also did let [REDACTED] work on [REDACTED] during some of [REDACTED] hours. I gave [REDACTED] a full week off at some point. [REDACTED] only ended up working for the [REDACTED] total. I did have to submit two papers for publication and over the summer months I asked [REDACTED] if [REDACTED] wanted me to work on two of [REDACTED] chapters to prepare them for publication. I otherwise had other manuscripts that I could have completed within this timeframe. [REDACTED] indicated that [REDACTED] wanted me to work on [REDACTED] chapters to prepare them for publication. When [REDACTED] accepted the [REDACTED] was made aware that [REDACTED] would need to work as [REDACTED] during that time and [REDACTED] selected to work 28 instead of 40 hours a week so [REDACTED] would have time to work on [REDACTED]. Working on these two papers was working on [REDACTED] as [REDACTED] ended up using them as [REDACTED] chapters. All [REDACTED] had to do for the papers I was working on was prepare better figures, answer some questions and do some minor statistical analyses. I was doing the chunk of the work myself. [REDACTED] ended up putting these papers I prepared as two chapters of [REDACTED] even after removing [REDACTED] from my laboratory. Therefore, I pretty much rewrote two of [REDACTED] chapters, I had already accepted to drop the fourth chapter over the summer to help [REDACTED] finish earlier (although we agreed [REDACTED] would provide all analyses and methodology before leaving the laboratory) and all [REDACTED] had to do was finish the third chapter. I had already made comments on this third chapter previously and I noticed when I asked to see [REDACTED], which was provided to me after [REDACTED] graduated, that [REDACTED] had never incorporated my comments on the third chapter in the version [REDACTED] submitted for [REDACTED]. The third chapter, as a consequence, includes various errors.

██████████ had plenty of time to finish ██████████ third chapter. As mentioned above, I even gave ██████████ an entire week off at some point to finish it (██████████ worked for ██████████). The fourth chapter was supposed to be part of ██████████ but over the summer months I decided, to help ██████████ out, that ██████████ did not have to write it but that ██████████ should have all the data available and analyses completed before leaving and ██████████ agreed. Dr. Paskewitz did not check the facts before filing all these accusations against me. I told a technician in the laboratory that it would be hard to see ██████████ go, like it is hard to see your students go after they have been in the laboratory for ██████████. I have a wonderful postdoc in the laboratory who organizes the laboratory very well. I did not need ██████████ for that.

Dr. Paskewitz claims that I told ██████████ ██████████ could not use the version of the manuscripts I prepared for ██████████. Given the chapters had been changed a lot from what ██████████ had originally provided to me, I was not sure whether it was proper to use the manuscripts I had rewritten in great majority as ██████████ chapters. I told ██████████ I would inquire with colleagues. There was no consensus on this issue. Moreover, at some point ██████████ sent ██████████ committee versions of these two chapters that were not the final versions. I told ██████████ not to do this and to retract these versions as for comments from the committee to be helpful they should be done on the final version of the chapters.

Dr. Paskewitz seemed to have believed everything ██████████ told her without checking any of the facts with me or the other members of the laboratory, besides possibly a disgruntled, and in my opinion, emotionally unstable employee, ██████████.

The last paragraph of this email is very interesting. If Dr. Paskewitz was so concerned about employees in my laboratory, why did she not follow up on this and talk to any of them? She also claims that many employees have been fired. I am not sure where she got this information as I have fired one employee in 14 years. Interestingly if she had asked around she would have found out that the two people creating an unpleasant atmosphere in the laboratory were ██████████ and ██████████ and that a pleasant atmosphere was restored following their departure.

Dr. Paskewitz has jumped to conclusions without first checking any of the facts. She has also spread this information all over the place, including to my ARS supervisor, Dr. Philipp Simon. Such behavior makes me wonder what her ulterior motives were/are.

I was also made aware of a second email sent to the same people. Below is my rebuttal to this second email.

Email of October 1, ██████████

Dr. Paskewitz indicates that ██████████ continues to try to finish ██████████ without support. This is interesting given that I was working on the two chapters that ██████████ ended up putting in ██████████. ██████████ indicates that ██████████ is being bullied and abused but no evidence is presented to this effect. I was doing the majority of the work on the chapters and all ██████████ had to do were some minor analyses and preparing figures for publication. ██████████ had ample time to work on ██████████ third chapter. I had agreed to drop the fourth chapter over the summer months but ██████████ was expected to and had agreed to provide materials and methods and the data analyses before leaving the laboratory.

The interpretation of what occurred described in the next paragraph by Dr. Paskewitz is outstanding. I simply indicated to [REDACTED] that if [REDACTED] were using the versions of the chapters I was writing as manuscripts [REDACTED] should be prepared [REDACTED] made in the manuscripts. I was letting [REDACTED] know as some of the arguments were in areas [REDACTED] was not familiar with and I wanted [REDACTED] to be prepared [REDACTED] if it came up during [REDACTED].

The two chapters [REDACTED] sent that day were, as I mentioned earlier, not the last version of the manuscripts prepared for publication. As I also mentioned earlier I indicated that if [REDACTED] used the manuscripts I revised [REDACTED] [REDACTED] should send the final versions so that comments made by the committee can be helpful. That is all this referred to.

Dr. Paskewitz indicates that [REDACTED] has not permitted discussions with me. This is interesting and another interpretation of this fact is that, if she had talked to me (or even four other members of the laboratory), Dr. Paskewitz may have figured out that claims made by [REDACTED] [REDACTED] were unsubstantiated. But she never bothered and one has to seriously wonder why.

E1 (3 pages)

Simon, Philipp

From: Susan Paskewitz <smpaskew@wisc.edu>
Sent: [REDACTED] 10:36 AM
To: Benedict Weisse; Richard Straub; Simon, Philipp
Subject: Fwd: Update, situation with Johanne

Phil, Ben and Dick:

With [REDACTED] permission, I am forwarding an email [REDACTED] sent on Friday. [REDACTED] is the student in Professor Brunet's lab who is experiencing a lot of stress as a result of the negative interactions. This past week, in front of witnesses, she belittled and made fun of [REDACTED] family in [REDACTED]. This during a time when [REDACTED] and [REDACTED]

I met with [REDACTED] Friday afternoon from 5:30 until 6:30 to discuss [REDACTED] situation. [REDACTED] showed me a letter [REDACTED] received before [REDACTED] arrived here 5 years ago, from a former member of the lab who was warning [REDACTED] off. This [REDACTED] showed to [REDACTED] professors in [REDACTED] who told [REDACTED] to take the position anyway because the letter could not be verified.

[REDACTED] shared a string of text exchanges with Prof Brunet that [REDACTED] had been having during the day in which she ordered [REDACTED] to work on papers during [REDACTED] free time for her to submit for her USDA requirements. These are revised versions of two of [REDACTED] chapters. [REDACTED] is writing a third chapter, which [REDACTED] is completing during [REDACTED] personal time. [REDACTED] works 28 hr/week [REDACTED]. Dr. Brunet had signaled that the first two chapters were ok for [REDACTED] in an email but noted that they needed work for submission to a journal. [REDACTED] says she refuses to allow [REDACTED] to work on these USDA required publications during the hours while [REDACTED] is working as a [REDACTED]

[REDACTED] needs to finish the third chapter soon [REDACTED] and [REDACTED] (leave runs out at the end of October). There isn't any reason that I can see why [REDACTED] wouldn't be able to finish the third chapter except for the demands on [REDACTED] free time for these other goals that are not critical to [REDACTED] completion of requirements [REDACTED]. The PI is also demanding that [REDACTED] finish a fourth chapter before [REDACTED] leaves, which was not part of the original plan. She apparently told the technician in the lab that she wasn't ready to let [REDACTED] go because [REDACTED] is such a hard worker and helps manage the lab. She has offered to house [REDACTED] if [REDACTED] doesn't make the [REDACTED]. She also told [REDACTED] that [REDACTED] could not use the edited versions of the first two chapters (the versions they had worked on together) but would need to provide the committee with [REDACTED] own original versions (i.e. she will not mentor [REDACTED] by editing/guiding the writing before the committee sees the chapters).

[REDACTED] believes that if anyone outside the lab discusses this with her she will respond by refusing to sign off on [REDACTED]. I have told [REDACTED] that [REDACTED] can lodge a grievance at any time. There is a process to remove a PI from the committee and replace with another faculty member. I also told [REDACTED] the department would support [REDACTED] financially if he decides to quit [REDACTED]

[REDACTED] says that others in the lab are nearing a point where they will speak up about this and other issues. They are afraid for their jobs and futures but disgusted with the situation. I would like to develop a plan for offering confidential conversations to each of them and some way to protect them from the fallout. In this regard, could USDA provide salary for 6 months for the technicians if they were fired? Apparently many have been fired in the past.

E2 (2 pages)

Simon, Philipp

From: Susan Paskewitz <smpaskew@wisc.edu>
Sent: [REDACTED] 12:17 PM
To: Benedict Weisse; Richard Straub; Simon, Philipp
Subject: Fwd: Response from Johanne after I sent chapter 1 and 2

[REDACTED] continues to try to [REDACTED] without support. As you can see in this email, [REDACTED] is frantic with worry. [REDACTED] expresses a sense that [REDACTED] has been bullied and abused and says that [REDACTED]

[REDACTED] reported that there was an interaction last week where she demanded that [REDACTED] use [REDACTED] own unedited versions [REDACTED] (in other words, no assistance in writing from her) and [REDACTED] refused, saying [REDACTED] would use the papers they were preparing for submission. [REDACTED] said she visited with Dr. Schoville to discuss this, and [REDACTED] confirmed that it is typical in Entomology and other departments for the advisor to provide a lot of guidance and assistance in writing for publication and these are [REDACTED]. When she next visited with [REDACTED] she made assertions about [REDACTED] inability [REDACTED] of the publications which [REDACTED] look to indicate that she was threatening to make it very difficult for [REDACTED] if [REDACTED] persisted in using the publication-ready documents that [REDACTED] is first-author on.

[REDACTED] sent out [REDACTED] first two chapters today (the publications) and she immediately responded by telling the committee to disregard. I am sure the meeting she has planned on Monday will be difficult and there will be more emails between [REDACTED] committee and me. [REDACTED] has said that [REDACTED] is [REDACTED] because [REDACTED] wants to [REDACTED] and be able to [REDACTED] [REDACTED] has not yet indicated [REDACTED] permission for discussions with Dr. Brunet because [REDACTED] is concerned there will be retaliation if she discovers [REDACTED] has been discussing the interactions.

----- Forwarded Message -----

Subject: Response from Johanne after I sent chapter 1 and 2

Date: [REDACTED] 11:45:14 -0500

From: [REDACTED]

To: [REDACTED]

CC: Susan Paskewitz <smpaskew@wisc.edu>, [REDACTED]

Hello [REDACTED]

I'm sorry for the email that Johanne sent to you about disregarding my first 2 chapters for now. I really can't believe she did this. I'm so upset! First of all, there was no discussion between us because that was the meeting that she was a bully and kept saying to me that she doesn't think that I'm capable [REDACTED] certain things. The only thing mentioned about [REDACTED] was to add certain figures and that you can choose what to put in the manuscript. I added the figures like she said, and I was planning to submit the final version of the papers but I sent the one before the final because she never sent me the final versions. I asked for them (I have emails to proof this) but she didn't send those. Both pre-final and final versions are basically the same, just few words added/or removed. She has **NOT** been a mentor and I'm on my own, so it makes me mad that she dares to sent an email cancelling what I did. It is important to mention that she already said she doesn't

May 22, 2018

Dr. Brunet,

I have provided you with written materials (exhibits) and collected testimony as part of my charged investigation. You have indicated previously to me, and through a legal notice filed with CALS on your behalf (Ex19), that you require questions pertinent to any investigation that may result in disciplinary actions, to be given to you in writing before you will consider answering them. To that effect, I submit the following. There is no implied order in the topics. You may respond to any or all as you so choose.

Questions about your responses to Ben Weisse allegations:

1. In your 3/21/18 letter to me (Ex11) refuting Mr. Weisse's procedures, you wrote, "... at no point during this entire process was I or other members of the laboratory (other than [REDACTED]), asked about what was going on in the laboratory at the time, or asked for our version of events." Are you now aware that Mr. Weisse actually interviewed all [REDACTED] and [REDACTED] in your lab?

JB: I am not sure who represents a [REDACTED] in the laboratory; does this mean personnel with a bachelor degree? I am not sure when I learned that some people in the laboratory were being interviewed by Mr. Weisse. What I do know is that Mr. Weisse may have interviewed all these people but did not seem to have asked questions to find out what was going on in the laboratory. I was also interviewed by Mr Weisse and I would say the same thing about the results of my interview with Mr. Weisse. His goal was not to get an unbiased understanding of what was going on in the laboratory, but rather in gathering information to substantiate his biased views. In the process of my interview he never asked me about what was going on in the laboratory. What I have sought, and still seek, is a truly fair investigation that does not begin with assumed guilt, that does not seek to find preconceived conclusions, but that works to get to the truth. The truth that I know is what I have been telling: I did nothing wrong that justifies any kind of discipline. I might have been perceived to be insensitive by some students. Students might have disagreed with me. But there is nothing here that rises to the level of conduct deserving of discipline.

On 4/10/18, you send me a letter "providing .. some responses/context to the allegations made in Mr. Weisse's report." In that letter (Ex12) you highlighted several points where you thought insufficient information was provided in the report for you to reply fairly. I repeat those allegations now with more information so you can more fully respond (if you choose).

2. Previous: [REDACTED] : "When [REDACTED], while attending a lab meeting, I told the lab members that my brother stayed in his house. Dr. Brunet said 'Your brother must be stupid.'" [REDACTED] all witnessed this.
Clarified: [REDACTED] alleged, "Dr. Brunet said, 'Your brother must be stupid.'" [REDACTED] all witnessed this verbal exchange and each confirmed the statement attributed to Dr. Brunet.

Do you now wish to modify your previous response to this allegation?

JB: I did not say that [REDACTED] brother must be stupid. I could have said: This is stupid meaning that it is a stupid thing to do and it was misinterpreted by the people present. I did not say that [REDACTED] brother was stupid. To my knowledge, I have never met [REDACTED] brother. Moreover "stupid" in French Canadian is the same as silly so I mean silly when I use the word stupid in English. It is unfortunate but is a consequence of having English as a second language. Let me also offer that even if I said what I am accused of saying, which I do deny, it would be insensitive. It would not be courteous. But would it really be the basis of some discipline or an investigation? If I said this, I would expect there would be a note to me that it was

an insensitive thing to say and that an apology was in order. I hope that this incident is not going to be permitted to swallow the value of my career of good work.

3. Previous: [REDACTED]: *"When I had a committee meeting, Dr. Brunet was usually rude and would put me down in front of the committee."*

Clarified: [REDACTED] alleged: *"When I had a committee meeting, Dr. Brunet was usually rude and would put me down in front of the committee."*

Do you now wish to modify your previous response to this allegation?

JB. No. This is another example of where I was perceived evidently to not be sensitive enough. However, I assure you that it was never my intent to be rude or put any student down in front of the committee or at any time. Doesn't it strike the investigator as odd that these issues are brought up now but in all the committees I have served on in the past 15 years, which are quite numerous, there was never any indication that I was rude to students or put them down in any ways; I would say it is quite the opposite.

4. Previous: [REDACTED]: *"I didn't know what I was looking for and Dr. Brunet scolded me for this. She then physically slapped my hand; not hard, but enough to get my attention. It was emotional that she physically touched me in a negative way."*

Clarified: [REDACTED] alleged: *"In [REDACTED], very soon after [REDACTED] began, (Dr. Brunet) had [REDACTED]. However, since [REDACTED] was [REDACTED]. Thus [REDACTED] didn't exactly know what [REDACTED] was looking for. JB scolded [REDACTED] for this. She physically slapped [REDACTED] hand; not hard, but enough to get [REDACTED] attention. [REDACTED] did not give her permission to touch [REDACTED] ([REDACTED]) said that this negative physical contact was emotional for [REDACTED]"*

Do you now wish to modify your previous response to this allegation?

JB: I have no idea of what [REDACTED] is referring to here.

5. Previous: [REDACTED]: *"I conducted research and collected data on a research project and was promised 1st authorship. When the paper was submitted, I was not put as first author and was not told of this."*

Clarified: [REDACTED] alleged: *"I conducted research and collected data on a research project and was promised 1st authorship. When the paper ([REDACTED]) was submitted, I was not put as first author and was not told of this. I had already left the lab and (Dr. Brunet) did this on her own." [REDACTED] a co-author was also not consulted on this authorship arrangement.*

Do you now wish to modify your previous response to this allegation?

JB: I never "promise" first authorship. If a student does the work and writes the manuscript then they get first authorship. In this case, [REDACTED] did not do the work, [REDACTED] did the genomics work and wrote a significant portion of the manuscript. [REDACTED] participation in this manuscript was very minimal so [REDACTED] was first author because [REDACTED] did the work and took charge of writing the manuscript. I would think the concern of the university here would be that work is fairly represented in the publications. I do hope you are investigating whether this student is trying to get credit for work [REDACTED] failed to do. That is of vital concern to me in the pursuit of honest academic endeavors.

6. Previous: [REDACTED]: *"After conducting research, collecting data, computing result and writing a paper, I submitted it for publication. After I left the lab, it came back as accepted but needing revisions. Dr. Brunet made revisions and changed authorship to herself and did not tell me about this change in authorship." [REDACTED] witnessed this.*

Clarified: [REDACTED] alleges: *"After conducting research, collecting data, computing result and writing a paper, I submitted it for publication. After I left the lab, it came back as accepted but needing revisions. Dr. Brunet made revisions and changed authorship to herself and did not tell me about this change in authorship." The paper was [REDACTED] the 3rd author on*

this paper also was not informed of the authorship changes made immediately before publication. By the time [REDACTED] became aware and notified [REDACTED] the paper was in press and authorship could not be changed back.

Do you now wish to modify your previous response to this allegation?

JB: No. This manuscript went through numerous iterations before it finally got accepted. It was originally submitted to a different journal, not the [REDACTED] mentioned by [REDACTED]. After revisions, the manuscript was rejected from the first journal. [REDACTED] and [REDACTED] do not seem to remember this very well. While revising for another journal, I realized that many of the analyses [REDACTED] had done had errors and had to be redone. Moreover the manuscript was largely rewritten by me in preparation for this other journal. This paper was not an area [REDACTED] was familiar with but [REDACTED] was there to learn and [REDACTED] was in charge of data analyses for this paper. The data had already been collected. Unfortunately, [REDACTED] did not do the greatest job with data analyses and I had to put so much work to prepare the manuscript for the second journal that I did switch the order of authorship when submitting to that other journal. It was quite justified. [REDACTED] and [REDACTED] do not seem to recall what went on with the manuscript before it got accepted. Authorship order was not switched immediately prior to publication, as they claim. They do not even seem to realize that the manuscript was originally submitted to a different journal from the one it was finally accepted in. I cannot say that they are lying. That is not my judgment to make. But I can say that their facts are absolutely wrong and that they did not have all the information, clearly.

7. Previous: [REDACTED]: "When selecting grad students, Dr. Brunet chose not to [REDACTED] because [REDACTED] and if there was a problem, I wouldn't be able to trust her to tell me."

Clarified: [REDACTED] alleged "that one time when JB was hiring undergrads, one was [REDACTED]. JB said that she wouldn't hire [REDACTED] because in that culture, they don't [REDACTED], so if there was a problem, [REDACTED] ([REDACTED]) wouldn't tell us about it.

Do you now wish to modify your previous response to this allegation?

JB: No. I have [REDACTED] to work in the laboratory so this would not be the reason I would not have hired this student. This is personally very offensive to me. Given my ethnic background, I would not, and have not, [REDACTED]. This can be easily refuted by noting that I have previously hired people from a variety of backgrounds, [REDACTED]. I would not have said what I am accused of saying because I simply don't believe it.

General Questions:

8. In general, would you describe your professional relationships with most Horticulture faculty members as cordial and collegial?

JB: I do not have many opportunities to interact with Horticulture faculty in general. Our research areas are quite different so I do not see them much. I work on a research project with Dr. Philipp Simon who is my research leader for the Agricultural Research Service. I have also worked with [REDACTED] who [REDACTED] in my laboratory [REDACTED] and the department of Horticulture. We have continued to work together for a while but both have other research areas to prioritize for the USDA-ARS. I see some of the Horticulture faculty once in a while and have participated in some social events with a few of them. But as is the case for faculty from many other departments, I do not run into them much. This whole area strikes me as an attempt to stretch to find things that can be criticized. I readily confess that I am not always the most social person in the room. Who is? But it is not fair to scrutinize all of my interactions and to make judgments on them. Who could possibly bear such scrutiny?

9. Are there exceptions to these relationship descriptions you would like to note, or have me made aware of?

JB: I am not sure what you are asking me here. As mentioned above I work with some faculty members in Horticulture who also happen to be USDA-ARS. I have seen some faculty once in a while in social events away from campus.

10. [REDACTED] worked with you for [REDACTED] years on [REDACTED]. Why is [REDACTED] not listed in your CV as a previous [REDACTED]?

JB. I do not list [REDACTED] because [REDACTED] left before [REDACTED] completed [REDACTED] degree and [REDACTED]. I suspect if I thought about it there would be other students in this situation who were not on my CV as a prior [REDACTED].

11. Please describe any funding changes in [REDACTED] which required you to terminate [REDACTED], but then reinstate [REDACTED] (later) with [REDACTED]?

JB. [REDACTED] was not a [REDACTED] but worked as [REDACTED] for [REDACTED] for [REDACTED]. As a [REDACTED] person, I need to move funds to UW in spring prior to the academic year in order to have funds for graduate students. [REDACTED] was scheduled to finish over the summer so funds were not moved over and therefore were not available. This distinction is very important and I encourage you to ask if you have further specific questions about it.

12. Are you aware the University of Wisconsin and not the PI is the owner of research results obtained on all sponsored projects?

JB. I am aware of this but because I am USDA-ARS employee things are more complicated. When I create a WISPER record there is additional information provided indicating that I am a USDA-ARS employee and that the rights belong to my employer, i.e. the USDA-ARS. I sincerely hope that you are aware of the interplay between my two distinct roles because it matters greatly.

13. In general, it was customary in your lab for graduate students, supported as RAs or TAs, to work on your personal USDA projects during the summer. They worked on their (thesis) projects mostly during the academic year. Is this true?

JB. Students did not work on my personal USDA projects. Summer work was from a funded NIFA grant and the condition of such a grant is that work be linked to the grant project. Because students had elected to work on their own projects, for which I did not have grant funds, they had the choice of working on the field work in the summer to get summer funding. They worked only a few months over the summer and only for part of the day. It was their choice; but it was the only way for me to provide funding to them over summer months. This is a typical practice in Ecology and Evolution, the discipline I was trained in and in L&S.

14. Were [REDACTED] who contributed to data collection, ever cited as authors on any papers arising from your USDA summer projects and not just on papers from their own academic projects?

JB: These were not USDA summer projects but a project funded by a NIFA grant. [REDACTED] [REDACTED] were gathered in the field and [REDACTED] is first author on that manuscript. Other students that helped collect data are acknowledged. These are long term field studies and may include 20 + people that helped in data collection over the years.

15. If "yes" to #15, please cite 1-2 examples.

JB: See my answer to question 14.

16. Did you ever respond to [REDACTED] request for your help and suggestions on their personal project (Ex15), with "I have other priorities and you are not at the top of my list." If so, why?

JB: No. What I may have said is that I cannot always review something immediately but will get to it as soon as possible. I have many obligations and try to review things in the order in which they are received. I certainly don't profess to recall everything I ever said. But this seems truly out of character for me, even on days when there is not a lot of time for courtesy. I am certain I said things that were perceived by others to be inconsiderate or impatient. Everyone has done that. But I just don't think I would say something like this.

17. Do you feel as a faculty member, you provided satisfactory educational and professional outcomes for the graduate students you mentored?

JB: Yes. I provide the students with many opportunities and plenty of help. I help with the design and execution of their projects. I make sure they get the help they need to gather their data, i.e. undergraduate help when needed and help with their statistical data analyses. I have gone out of my way to provide funds for supplies and greenhouse room rental for student projects that were outside of my grants. I have encouraged them and helped fund their participation in regional meetings. I revise their chapters/papers and provide various comments. I hope you agree that my evaluations demonstrate a true commitment to the students. That is not to say I am perfect. I am sure that with all the students with whom I have dealt there are some who were not satisfied. But generally, I think I do provide satisfactory (and above) educational and professional outcomes.

18. In [REDACTED], you received letters of reprimand from (Horticulture Chair) Dennis Stimart and (CALS Dean) Molly Jahn regarding a physical contact incident with [REDACTED] (Ex17). To your knowledge, are these the only letters of professional reprimand you have received from the UW while you have been employed here?

JB: Yes.

19. Have you been asked for professional letters of recommendation from your previous academic personnel, after they left your lab?

JB: Yes.

20. During your interview with Mr. Weisse (Ex13, 11/15/17) you related an incident on [REDACTED] involving [REDACTED] and 2 attorneys, "(She) asked them what they were doing and ... indicated that this was not the place for such a meeting and politely asked them to leave the office. She escorted them to the first floor and then left the building. Dr. Brunet never said that this person was kicked out of her laboratory because [REDACTED] had a [REDACTED]. That person was politely asked to leave the office and was escorted out of the office by Dr. Brunet that evening." The other 3 people involved in this incident characterize your behavior quite differently, alleging you were hostile, demeaning and verbally abusive.

Is there an explanation for the dichotomy between witness statements ("anger and hostility") and your account ("politely asked")?

JB. I did not yell or raised my voice when I asked them to leave the laboratory; to me that means I was polite. I was in no way abusive or demeaning. I was firm, but that is it. I believe I had the right to be firm in this circumstance. Why the dichotomy? I do not know for sure, but I assure you that I was neither yelled nor raised my voice. It was not necessary. For the record, the people with [REDACTED] shared their names and told me they were working on [REDACTED] that is all I was told about them.

21. [REDACTED] had a [REDACTED] that ran until January [REDACTED]. Allegedly, you approached Phil Simon in late October [REDACTED] with a request to fire [REDACTED]. What was the urgency in this termination if [REDACTED] was due to leave within [REDACTED]?

JB: My request was to get help to figure out how to deal with [REDACTED] was not performing [REDACTED] job. [REDACTED] came in whenever [REDACTED] pleased, often after 2:00 p.m., left the laboratory without warning to go to some [REDACTED] or to go help a former advisor. [REDACTED] was not performing [REDACTED] duties; the reports [REDACTED] sent me indicated that things were not moving forward, and [REDACTED] was not receptive to any comments coming from me. We had reached an impasse I did not know how to solve. I was seeking advice/help. I was also busy and would have greatly appreciated a colleague who was working.

22. Were you aware at the time of your request to fire [REDACTED], that [REDACTED] had recently filed scientific misconduct allegations against you [REDACTED]?

JB: No. This is the first time I learn that [REDACTED] is the person who filed these misconduct allegations. The allegations were filed with UW as far as I understand and the Vice Provost for ethics later contacted USDA-ARS. I am puzzled as to the grounds [REDACTED] had to make any such allegations. It is very frustrating because [REDACTED] never indicated to me in any way that I had engaged in any misconduct. It was [REDACTED] who was not doing [REDACTED] job.

Questions about [REDACTED]

23. [REDACTED] was interviewed by [REDACTED] [REDACTED]. A transcript of that interview was given to [REDACTED], then returned, signed to the [REDACTED]. [REDACTED] send me a copy of that interview transcript (Ex15) and allowed that I could make it available to you (Dr. Brunet). As a summary of [REDACTED] point of view concerning how [REDACTED] believes [REDACTED] was impacted by your behavior, this document contains statements and putative allegations relevant to the current investigation. Cited names are redacted unless I have explicit permission to use them.

Do you have a response to this document and the information in it?

JB. YES. This document is filled with lies, distortions, and misrepresentations of events and facts. There is very little that bears resemblance to reality. Moreover, I do not understand how [REDACTED] knows some of the information [REDACTED] is distorting but referring to. Some of this refers to events that occurred long before [REDACTED] joined the laboratory and I did not share such information with [REDACTED] or other lab members. Other events, such as the situation with [REDACTED], would have had to be told to [REDACTED] by someone because [REDACTED] had left when this took place and this is as far as I was aware confidential/ private information. I hope that you share my perspective that the comments of [REDACTED] demonstrate how completely committed [REDACTED] is to undermining my positions. [REDACTED] is willing to offer information for which [REDACTED] has no basis. This is truly regrettable. I do hope that this investigation does not permit someone with such vile intentions to prevail.

24. [REDACTED] appointment letters stipulate the expectation of continued [REDACTED] until a student's degree completion. By accepting a student, even if a grant ends, the mentor and department have a commitment to work together responsibly to meet that obligation. Why did you feel your financial support of [REDACTED] did not need to extend up to and including [REDACTED] in the fall of [REDACTED]?

JB: This statement is incorrect. There is no such mention in the letters of acceptance provided to my [REDACTED] and I have not seen letters provided by other faculty to their student(s). I even know of cases in my department where no funding was provided to [REDACTED] for the majority of their time. [REDACTED] turned down [REDACTED] for the fall without talking to me about it. [REDACTED] did not want [REDACTED] I did provide funding to [REDACTED] in the fall. I did not have funds available from a UW account but I came up with an alternative solution. The chair of the department, Dr. Paskewitz, never offered to cover [REDACTED] as [REDACTED] although she had various opportunities to do so.

25. Dept. records suggest [REDACTED] is the only student you [REDACTED]. All others were [REDACTED] or had their own funding ([REDACTED]) throughout the course of their degree programs. To the best of your knowledge, is this true?

J.B: [REDACTED] was not [REDACTED] but I was able to give [REDACTED]. That was the only way I could think of to provide [REDACTED] with some funds in the fall. Susan Paskewitz, the chair of Entomology, was aware of the situation but never offered to provide departmental assistance in the form of an RA. Please understand that I was trying to help [REDACTED]

26. In [REDACTED] was preparing to complete [REDACTED] degree. Why wasn't [REDACTED] granted to [REDACTED] so [REDACTED] could finish expeditiously?

JB: Because as explained earlier [REDACTED] funding over the summer months was provided from grant funds that did not cover [REDACTED] research area. [REDACTED] was never [REDACTED] and this was understood by [REDACTED] when [REDACTED] accepted the position in the laboratory. There might be some misunderstanding here, but [REDACTED] was never [REDACTED].

27. Did you anticipate that [REDACTED], specifically, would create time-management difficulties for [REDACTED] that were incompatible with the simultaneous completion of [REDACTED] degree?

JB. No. The conditions of the work were made clear to [REDACTED] before [REDACTED] accepted the position [REDACTED]. [REDACTED] even selected the number of hours [REDACTED] was willing to work. [REDACTED] was quite happy with the situation, at least this is what [REDACTED] expressed to me. This position was compatible with completion of [REDACTED] degree.

28. Did you ever state to [REDACTED] or to any other student, "I pay you; I won't lose my job because of you; I have USDA deadlines; or if I'm in problem with the USDA-ARS, you all will be in problem too".

JB. No. I certainly don't recall saying this. I do have USDA deadlines, so, I could have mentioned that. I am not sure what the other statements would have referred to. I am not sure what the "if I'm in problem with" would have referred to. If a professor loses their job or leaves to go somewhere else it is true that the students have to readjust their situation. I freely admit to discussing deadlines and impressing on the people working with me that we had to meet those deadlines, but the verbiage described in this question is an exaggeration at the very least.

29. [REDACTED] alleges you insisted that [REDACTED] must rewrite [REDACTED] chapters (particularly 1&2) independent of the manuscripts you (both) were co-authoring for your USDA progress requirements. You notified [REDACTED] committee ([REDACTED]) via email, that, "... I am not comfortable with [REDACTED] using the versions I prepared for journal submission [REDACTED]. I actually do not feel it is acceptable at this point."

JB. I had been removed from [REDACTED] committee at that point so I did not feel like the two chapters whose introduction and discussion I pretty much rewrote could ethically be part [REDACTED] without me being on [REDACTED]. That is what this statement was referring to. I stand by that and hope you support me in it. The alternative would be to endorse misrepresentation and I think that lacks integrity.

Why did you ask for the same data to be written up twice in 2 different formats, using only [REDACTED] own unedited (by you) versions [REDACTED]?

JB. I do not understand this question. I had made many edits to all three chapters [REDACTED] prior to rewriting two of the chapters to get them ready for publication. I made various edits to the first two chapters earlier on and to the third chapter also, although [REDACTED] never incorporated these suggestions in the version of the third chapter [REDACTED] submitted [REDACTED]. Perhaps I am misunderstanding the question, but the work went through many iterations. This is quite normal.

30. On [REDACTED] you sent an e-mail to [REDACTED] retracting (without [REDACTED] permission) versions of those chapters [REDACTED] sent them, causing [REDACTED]. Why did you do so?

JB. [REDACTED] did not send to the committee members the last version of the chapters. All I said is to send the last version so [REDACTED] could get their comments on the submitted chapters, as it would be useful. This did not cause any [REDACTED]. [REDACTED] sent something on a Saturday and this was corrected on the Monday so there is one day, a Sunday, in between.

31. On [REDACTED] you directed an e-mail to Drs. Paskewitz and Young, cc-ed to the CALS Dean and the Provost, with these statements, "... [REDACTED] .. [REDACTED] must also agree to leave behind the research [REDACTED] has done in my laboratory over the [REDACTED]. The only way [REDACTED] can [REDACTED] [REDACTED] is if [REDACTED] ... It would actually represent stealing research from my laboratory. By participating in the committee, the committee members are directly participating in stealing research from my laboratory.... ([REDACTED]) is not only a direct violation of research ethics but a direct attack to the research process in an academic setting."

This email can be read as hostile or punitive to [REDACTED]. What was your purpose in sending it, and how did you think it would be received?

JB. This email had nothing to do with being punitive to [REDACTED]. I had never seen anything like this done during my 30+ years in academia, in different departments and Colleges and Universities, and I was really trying to figure out what was going on and to protect the work I had invested a lot in during the last [REDACTED] while also protecting the USDA-ARS. To permit [REDACTED] to take work that I oversaw and for which I was responsible, and to use it without my input, again represented a major departure from proper protocol, it seemed to me.

32. There appear to have been significant communications breakdowns between you and [REDACTED] which caused [REDACTED]. Do you bear any responsibility for this outcome? Are there mitigating factors I should consider?

JB. Interestingly, every time I met with [REDACTED] [REDACTED] led me to believe that everything was fine. I had no reasons to believe otherwise so no I was not aware of a significant communication breakdown between the two of us. It is now clear to me that there were communication breakdowns. I regret that [REDACTED] did not bring those to me directly or seek some intermediary to deal with them. This kind of after-the-fact attack is very unprofessional and unfair, it seems to me. If there were issues, I should have been permitted to address them at the time, not called to answer for them long after [REDACTED] was gone.

Questions about putative retaliation:

33. Subsequent to [REDACTED] decision to serve on [REDACTED] final defense committee ([REDACTED]), did you go to the lab of [REDACTED] and remove a piece of equipment you had loaned [REDACTED] but not currently in use by you?

JB: [REDACTED] had been on [REDACTED] for many years so [REDACTED] was expected to serve on [REDACTED] committee. My people had actually gone to [REDACTED] laboratory a number of times to use the instrument so it made sense to bring it back to my laboratory. We are using it quite frequently as we are doing more DNA work again. Moreover, the instrument in question was way up on a shelf in [REDACTED] lab., suggesting that [REDACTED] laboratory was not using it much. While I let [REDACTED] keep the instrument in [REDACTED] laboratory while my laboratory did not do genomics work, this has changed this year as we have projects and personnel doing genomics, so we needed the instrument back.

34. [REDACTED] had a committee meeting on [REDACTED] that sanctioned the data [REDACTED] has collected as sufficient for [REDACTED]. I have reviewed emails which show that you continually changed expectations, timelines, and turnarounds for [REDACTED], making it difficult for this student to finish

before a pending UW deadline that might have prevented [REDACTED]. It took almost 6 months for you to finally sign off [REDACTED]. Why was this?

JB. I am not sure what you mean that the committee meeting sanctioned the data [REDACTED] has collected as sufficient for [REDACTED]. As far as I recall, [REDACTED] did not collect much data past that date but was working on completing data analyses and writing the manuscripts. I had a technician collect the rest of the behavior data needed to confirm some trend in late [REDACTED]. There were no problems with [REDACTED] this was checked at the time. I am not sure of the emails you are referring to so I cannot comment on them. [REDACTED] in [REDACTED] which slowed the writing [REDACTED] chapters.

35. [REDACTED] alleges that [REDACTED] was “terrified” of interacting with you and sought the Chair’s help in mediating required interactions for [REDACTED] degree completion. In your opinion, why did this student perceive that direct communications seemed prohibitive?

JB. I was not aware that [REDACTED] was terrified of interacting with me. One day I was informed that [REDACTED] had been [REDACTED] [REDACTED] at UW to work under the supervision of [REDACTED] who [REDACTED]. I did not know [REDACTED] had even applied. [REDACTED] still wanted to get [REDACTED] so I told [REDACTED] that [REDACTED] needed to complete some experiments before [REDACTED] could get a degree. [REDACTED] had not accomplished much of the work we had planned for [REDACTED] to do for [REDACTED]. [REDACTED] was known to overreact emotionally to situations and this had been witnessed by other professors and members of the laboratory. That is my only potential explanation. I know that I strike people sometimes as being stern and demanding. That is part of my demeanor, perhaps. It is part of my no-nonsense approach to my research. But I am not unkind. I am concerned about my students. I wish they had been direct in their concerns because I would have addressed them. Please don’t let my substantial good works become washed away by the allegations of a few. No one could withstand the kind of scrutiny that examines every bad day or unsatisfactory interaction one has ever had.

36. Did you ever threaten to withdraw tenure support from junior members of the faculty if they did not voice their personal support for your 2016 promotion package?

JB. No. Junior faculty do not vote on such promotions as this is done at the Executive Committee level. Moreover, I do not vote on tenure of faculty members as a USDA-ARS person.

37. While a team member of the [REDACTED] faculty, on [REDACTED], you abruptly withdrew from a planned final exam review session after telling the students not to study, you couldn’t help them, because you didn’t know what was on the exam. [REDACTED] and [REDACTED] told me this was considered a “ballistic” response to the team’s edits of your submitted exam questions. Later that day you resigned from the course via e-mail, citing disrespect and you did not participate in completing, proctoring or grading the exam. These witnesses allege your behavior, was hostile, unprofessional, an abrogation of your responsibilities as a faculty member, and in retaliation for changes in your submitted questions. Do you have a response to these allegations?

JB. While I was gone on a trip, the [REDACTED] team wrote and selected the exam questions for my section of the course without consulting with me. The questions did not reflect what I had taught during the course and many of the questions were, in my opinion, incorrect. When I asked them to modify the questions they were not receptive and refused. I did not want to participate in grading such questions as I did not agree with them and the questions were, in my opinion as an expert in the subject area, incorrect and unfair to the students as it did not reflect the material I had covered in lectures. I considered their behavior to be totally disrespectful of my contribution to the course and unfair to the students. Because I do not have a teaching appointment, and I was considering leaving [REDACTED] anyway, this event convinced me that it was time to do so and I decided to stop participating in [REDACTED]. I considered their behavior hostile and unprofessional and totally disrespectful. I was getting very good reviews from the students in the class and they remembered my section years later as indicated by students comments during a [REDACTED] reunion a few years later. If I withdrew from the planned final exam review session I do not see when I

could have told the students not to study, that I could not help them etc... because I did not see the students much except during the review sessions. This was a large class and labs. were run by TAs.

Question about putative discrimination:

38. In discussions with any lab member, did you ever relate this story? *"One time (Dr. Brunet) mentioned that the USDA told her something about what kind of research they wanted to accomplish, and she called a certain person in D.C. (name unknown), exploded at him and also told him that they are doing this to her because she was a woman. Then when she finished the call, she said: "See, they won't do anything now because they may get scared of being accused of sexism". The witness couldn't believe what [REDACTED] was hearing. Allegedly, similar stories were shared to other members of the lab. (They) were all extremely uncomfortable, and (they) listened, but never gave an opinion to (Dr. Brunet).*

JB. This is a complete distortion of facts and reality. I did have some discussions with some of my USDA-ARS superiors about research areas as they wanted to move my research in a direction I was not trained and comfortable with. I may have mentioned something to some lab. members about not feeling comfortable with this new research direction. What is mentioned above is a pure distortion of reality. This is terribly unfair.

Questions about authorship allegations:

39. Brunet, J., [REDACTED] and [REDACTED]. [REDACTED]
[REDACTED]. Both co-authors allege you changed yourself to 1st author on this paper, at the galley proof stage, without informing them, and also allege this behavior was "directly retaliatory" for [REDACTED] participation in a then ongoing scientific misconduct investigation.

Do you have a response to this allegation?

JB. This statement is incorrect. This is a manuscript for which I had to redo a majority of the data analyses due to errors and did major rewriting of the manuscript. I did not change the name order at the galley proof stage. This is explained in more details as answer to a previous question. In short, it is about integrity. If I am associated with something, I insist that authorship be fairly represented. So should we all.

40. [REDACTED] and J. Brunet. [REDACTED]. [REDACTED]
[REDACTED]; [REDACTED]. [REDACTED] asserts that [REDACTED] was left off as co-author on this [REDACTED] paper as part of your retaliation for (among other incidents), supporting [REDACTED], in #1 above. Ex18 lists [REDACTED] contributions to this project.

Do you have a response to these allegations?

JB. I do not understand what I would have been retaliating against here. If I recall, [REDACTED] [REDACTED]. This manuscript is the result of [REDACTED] [REDACTED]. Moreover, [REDACTED] was [REDACTED] prior to [REDACTED] and [REDACTED] for some experiments is not justification for authorship by the USDA-ARS. Forms must be submitted prior to submission of any manuscripts and proper justification must be provided to include a technician on a manuscript. These include participating in design of experiments, data analyses, write up. Getting things set up or gathering data is not sufficient. Moreover, I have not seen [REDACTED] name on manuscripts from [REDACTED] [REDACTED] has joined since then.

41. [REDACTED], [REDACTED], and J. Brunet ([REDACTED]) [REDACTED]
[REDACTED]; Manuscript in preparation. [REDACTED] alleges (via interview, manuscript draft and submitted e-mail thread), that you has removed [REDACTED] from authorship status on this pending manuscript. In an email exchange with him, you wrote ([REDACTED]), "I have to ask permission to put [REDACTED] on a

manuscript and they will deny my request as they consider caring for plants and running samples not sufficient. You put [REDACTED] name on the draft without consulting me first, I never OKed it." Prior to [REDACTED] [REDACTED] was an acceptable author on several of your papers, and alleges your removal of [REDACTED] name here is retaliatory and not at all in line with USDA guidelines (Ex18).

Do you have a response to these allegations?

JB. [REDACTED] was an author on one paper in [REDACTED] and one in [REDACTED]. [REDACTED] in [REDACTED] if I recall. I am not sure how [REDACTED] can claim [REDACTED] was authors on many papers [REDACTED]

42. Brunet, M. [REDACTED], ([REDACTED]) [REDACTED]. [REDACTED] Abstract submitted (available online) [REDACTED] conference. [REDACTED] [REDACTED] alleges the work in this abstract overlaps the pending manuscript above. [REDACTED] was not consulted about using [REDACTED] name on this abstract and again questions why [REDACTED] is not cited.

Do you have a response to these allegations?

JB. I hired [REDACTED] for [REDACTED] while [REDACTED] was [REDACTED] laboratory to collect some volatile data from a large experiment I had in the greenhouse. This abstract summarized work I did with [REDACTED], [REDACTED] in my lab. at the time and I thought it would be nice to include some of the volatile data so I added [REDACTED] name to the abstract. The manuscript with [REDACTED] is separate from the work done with [REDACTED], I am still waiting from some data from [REDACTED] [REDACTED] so the manuscript on floral volatiles can be completed. It has been over [REDACTED] now since I hired [REDACTED] to do this. I thought [REDACTED] would be happy to see [REDACTED] name on the abstract as [REDACTED] is [REDACTED] and that could only help [REDACTED]. However, [REDACTED] apparently was not so I removed the referral to the floral volatiles from the talk/abstract. It was only a minor part of the presentation.

43. Why, on [REDACTED], did you remove [REDACTED] a co-author on this abstract?

JB. As explained in the previous answer, I removed the referral to the volatile work from the abstract/talk which represented only a small portion of the work involved. [REDACTED] did not participate in the rest of the experiment; only in a small section involving the volatiles.

Procedural question:

44. Is there any additional information besides all I have gathered or listened to (see Ex5-ACPprocedures) that you believe I should consider before configuring a report to the Provost, addressing the charges in this investigation? If you require additional information to respond to this or any question, please let me know.

JB. I again hope that you will take into account the fact that there are many students who speak highly of me, that there are many past students with whom I stay in contact, who readily acknowledge the positive influence I have had on their careers. I have served on many graduate student committees over the years and have never heard any complaints as to my interactions with the students, quite the opposite. My teaching in [REDACTED] and other classes at UW-Madison has always been well appreciated by students and I have received very positive reviews from them. I have worked directly with some undergraduate students in my laboratory, one of which is [REDACTED], and I interact with all of them so at least [REDACTED] testimony should be considered. There are over 40 undergraduates that have been trained in my laboratory over the years and I am still in contact with some of them. I was informed that closer to 12 letters or emails of support have been written. If some of these did not reach you, please contact my

██████████ ████████████████████, and ██████████ will make sure these letters/emails reach you. It appears that what I am facing here is a collection of allegations that arise from the same insular group. Obviously, those who have complained are dissatisfied. Obviously, they seek to hurt me. I regret that they feel that way. As I have described, in some cases the people involved did not do good work and I am being targeted for my efforts to spur them to excellence. Sometimes, it seems to me that my direct style was perceived to be offensive when I meant no offence. I have tried to be strong in my denials where there is no truth to the allegations.

I, [REDACTED], make the following statement freely and voluntarily to the, [REDACTED] knowing that this statement may be used in evidence. I understand that this statement may be shown to anyone with an official need to know.

1. Please state your full name and spell it.

[REDACTED]

2. What was your title and grade when you worked [REDACTED]?

[REDACTED] in [REDACTED], and became an [REDACTED], as a [REDACTED].

3. Where did you work?

[REDACTED], Madison, WI, and was [REDACTED] from the Department [REDACTED] from the University of Wisconsin-Madison.

4. For how long? What years?

As a [REDACTED] until I resigned on [REDACTED]. As a [REDACTED] from [REDACTED].

5. What were your duty hours?

As a [REDACTED] I worked in the lab 40-60 hours per week. Sometimes as a [REDACTED], I was compelled to work anywhere from 50-60 hours per week, and I was supposed to work only 28 hours per week, part-time.

6. Who is your 1st line supervisor? How long?

With Dr. Johanne Brunet from [REDACTED] as a [REDACTED] until I resigned [REDACTED].

7. Would you briefly describe your duties and responsibilities?

Work we did was supposed to be paid from the University of Wisconsin and/or USDA. When we worked for her, it was mostly Summers because sometimes during the Academic year either she paid us, or we [REDACTED]. Johanne required us to work weekends and holidays, 7 days a week for Summers [REDACTED], then from Summer [REDACTED] to [REDACTED] it was between 5-6 days. I was not compensated until I became a [REDACTED]. Dr. Brunet figured we were [REDACTED] and she could do as she pleased. We were always told that she paid us, and we need to do what she said. At the time, USDA employees were working in the lab and working more time than they were supposed to. They were anxious because they were told they couldn't do that and they complained to USDA in Madison. Dr. Brunet told them to work anyway. The other supervisor said they can't do that, but Brunet didn't pay much attention to this and they technicians continued working the same. Dr. Brunet didn't care what the other supervisor said (Dr. Phillip Simon). As [REDACTED], we worked in our projects during the academic year, most of the time by ourselves, and there were moments when we needed help and

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her response was: “I have other priorities and you are not on the top of my list”. Our research is supposed to benefit her and the USDA but if it was not her own summer project, you were not her priority. We were always confused of why she is a professor then? During Summers, the [REDACTED] stop most of our research and we needed to be in the field to do hers. A lot of stress and anxiety moments happened during those summers and again, we were only told that “you need to work because I paid you” and “I won’t lose my job (USDA) because you all”, so we were all threatened. After working in the field for many years, preparing fields and collecting data, we never got the recognition of the contribution we did, meaning that none of us are co-authors on her papers, but we were the ones taking the data for her under a very negative environment. We ALL preferred to be working alone in the field than having her there watching us. Some people got very anxious and even started crying when they saw her coming to the fields.

8. Who was your second line supervisor?

Dr. Phillip Simon (USDA and Department of Horticulture from UW-Madison)

9. What was Dr. Simon’s response to you being compelled to work uncompensated?

He didn’t know until [REDACTED] when I told him what was happening. He couldn’t believe all this was happening. He didn’t know that all this was happening in Entomology since [REDACTED] and so many people (students and technicians) were so affected. Dr. Simon cried a little because he knew I [REDACTED], and some other students as well. However, when Dr. Brunet was a faculty in Horticulture, some people complained with him and not much was done. Years later, the situation got worst, and students and staffs [REDACTED] and severely impacted.

10. During what time period did you work with Dr. Brunet?

From [REDACTED] as a [REDACTED] until [REDACTED]. We did research with her lab and the USDA’s name was not used in the best way.

11. Please explain, how was it not legal?

First, when we worked during the Summer in her project, we were [REDACTED] and by definition, a [REDACTED] should focus and work in his/her own project. For a [REDACTED] who is [REDACTED], we received an email from the University saying that after passing the preliminary exam, you must focus all your time [REDACTED]. That didn’t happen during Summers. The department told Dr. Brunet that in order to have us there, she needed to give us [REDACTED], but Dr. Brunet again didn’t follow instructions. Second, there was no way that we could express our ideas or thoughts about her project with her. We followed bees during the Summer and for example count how many flowers a bee is visiting. [REDACTED]

[REDACTED] and [REDACTED] of why she [REDACTED]. Another group of people [REDACTED] both in the USDA and UW-Madison. Third, as a [REDACTED], [REDACTED], I was impose to work many more extra hours than what I was supposed to, and I always received some kind of intimidating or threatening comment such as: “I pay you; I won’t lose my job because of you; I have USDA deadlines; or if I’m in problem with the USDA-ARS, you all will be in problem too”. I was very scared of the USDA and for many years I was under this impression, and the same happened to my colleagues. Fourth, it doesn’t matter how much work you do for her, either her summer project or another unrelated project in the lab, you will never be a co-author in her papers, and

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this is disrespectful and unethical to us as scientists. Lastly, it was incredible sometimes to hear from her how she mocked when her supervisor (Phil) told her to not continue making [REDACTED] to work extra, and when she had phone calls with USDA staff from Washington D.C., she always said a negative comment about them. One time she mentioned that the USDA told her something about what kind of research they wanted to accomplish, and she called a certain person in D.C. (I don't know the name), exploded at him and also told him that they are doing this to her because she was a woman. Then when she finished the call, she said: "see, they won't do anything now because they may get scared of being accused of sexism". I couldn't believe what I was hearing. Similar stories she shared to other members of the lab. We were all extremely uncomfortable, and we listened, but never gave an opinion to her.

12. How did the treatment from Dr. Brunet affect you?

In [REDACTED], I was [REDACTED] in Wisconsin and they said, since then [REDACTED], I had [REDACTED] where I live now. [REDACTED] when I was in Madison, WI because I [REDACTED] I was receiving by Dr. Brunet. Two more members of the lab (probably there were more), and myself, were [REDACTED] because of the stress and harassment we were receiving from Johanne. [REDACTED] and the [REDACTED]. I also needed to have [REDACTED]. Some other members of the lab ([REDACTED] left the lab because they said that they were [REDACTED], and they needed to put their health and family first. They preferred to be without a job than been in the USDA with Dr. Brunet.

13. What was your experience with Dr. Brunet?

[REDACTED] as [REDACTED] when I was [REDACTED], I received an anonymous letter that based on the post office zip code from Wisconsin. The letter said, "do not join to the Brunet lab...people have been fired because of her, they quit, or she makes them quit". I went there hoping to [REDACTED]. She works with bees, bumble bees, honey bees and leafcutting bees. At one point in Summer [REDACTED], I was learning about [REDACTED], so this was new to me), and I lost track of one [REDACTED], and she got very upset and slapped my hand. I told her: "you cannot touch me, even my parents don't touch me". This happened in July [REDACTED]. All the other people ([REDACTED] was one of them and her [REDACTED] in entomology) came to me and told me: "please don't tell her that - you will get fired". You can see that the members of the lab were terrified by her and I was starting to realize that the anonymous letter information was true. She didn't touch me again after. One student, [REDACTED], who started in the lab with me at the same time, was asked to leave the lab by Johanne and the lab members and department were in shocked and upset. [REDACTED] was an excellent student, [REDACTED], and currently is [REDACTED]. [REDACTED] especially the ones who arrived after me, suffered very bad. In [REDACTED], I went to the lab on a weekend to work and [REDACTED], [REDACTED] from our lab, and said [REDACTED] was [REDACTED] of Dr. Brunet's bullying and harassment. I have never seen someone [REDACTED] and it was a traumatic experience for me also to see this, all this caused by Johanne. I took [REDACTED] and [REDACTED]. I understood

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why other people in the lab thought that way. [REDACTED] is still [REDACTED]. Many of the victims can't do science anymore because of the trauma Dr. Brunet caused them. I was [REDACTED] student in the lab who "survived" the longest in the lab but at the end [REDACTED]. After many years in UW-Madison, Johanne has not graduate any PhD student. I was able to complete my degree thanks to the Department of Entomology and the University of Wisconsin-Madison. The same happened with [REDACTED] before me ([REDACTED] and [REDACTED]), where the department needed to intervene because Dr. Brunet will make everything impossible for the students to graduate.

When students/postdocs or staff complained when she was in Horticulture, the University [REDACTED] and she even told us that when she came back, she laughed at them and that it was a waste of time. Some of these lab members complained to the USDA as well in Madison and there was not action at all. Years later, the problem is worst and because nothing got done before, many of us were exposed to continue harassment, bullying and/or discrimination, and some of us [REDACTED] and in the present, some are [REDACTED], or never came back to do science. I'm still not okay with this. We've talked to the University and they know of what Dr. Brunet has done. They are not happy at all and now this investigation is in the hands of the Provost. They prohibited Dr. Brunet to get new students for now and this applied to all the departments she is involved (Entomology and Zoology). I know other members, [REDACTED] they're still getting help for [REDACTED]. While Dr. Brunet was in Horticulture, she took another student and shook [REDACTED] by the arms. [REDACTED] name is [REDACTED] and this happened around mid [REDACTED]. [REDACTED] also complained to the University and probably USDA. Johanne has done bullying, harassment, and discrimination to me. She said no one is going to take you seriously if you don't change your accent. [REDACTED]. She said you won't find jobs unless you change your accent. This seemed discriminatory. This was really working on my mind. I needed [REDACTED] for the first time because of this (around [REDACTED]). She sometimes made me repeat words in front of other people and this was very humiliating.

Me and the [REDACTED] finished our [REDACTED] without her help. She would say you are not my priority and I'm working on my own stuff. In June [REDACTED], I wrote her an email to plan for [REDACTED] ready and she said that she has other priorities and USDA deadlines, and I should ask other people to [REDACTED]. I asked her "what do you mean, you have the expertise in this topic and other people probably not". She said: "I'm not going to lose my job in USDA because I'm spending time on you". I sent emails to the Department of Entomology and my committee showing them what Johanne was starting to do to me, not willing to help me and the pressure I had. I was planning to [REDACTED] and I needed to cancel these 4 times. I had to [REDACTED] because she wouldn't look [REDACTED]. She didn't care, and this is obvious when you are told that she has other priorities and made you work in her [REDACTED]. We attended an [REDACTED] conference in June [REDACTED], [REDACTED]. There she told me she wasn't going to pay me anymore for the fall and that I needed to figure out. She blamed me for not finishing [REDACTED] but she never returned me the drafts I sent her, and it was very hard to finish while you were working for her in the field during Summer. Later in the Summer, she said I'm not going to pay you and also, I'm not paying your health insurance. I found out later it was illegal what she did when I talked to the University because students need to be covered (health insurance) all the time. She left me with no money and no health care. I needed to ask friends for help and many people were aware of what I was going through, so they cooked for me many days and there were moments (after August [REDACTED]) that I [REDACTED]. A professor not always needs to pay students, and we understand that, however, you can't tell them last moment that I decided to not pay you. We met with staff from entomology, together with

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Johanne, to find a way that I can get some payment and most importantly, health insurance, and she said that she didn't have money for me. However, she said that the only way she was going to pay me was if I become [REDACTED]. I knew this was going to end up bad. Many [REDACTED] have left/quitted because they were [REDACTED]. This is why the idea of becoming a [REDACTED] was terrifying, plus also I was still a student [REDACTED]. I have no choice but to accept a position as a [REDACTED] and in September [REDACTED] I became a [REDACTED] to have some income. I was working for her 28 hours under the contract, and I needed to apply for the Affordable Care Act in order to get insurance. I used all the money from my [REDACTED] to pay the credits, tuition and fees from UW-Madison, because last moment she also decided to not pay me the research credits from college (~2,500). Some other professors from entomology and horticulture offered me to work with them so that I can get some paycheck (instead of working for her [REDACTED]), but these professors were also scared of dealing with Johanne and because they were so stressed, I decided to [REDACTED] because I didn't want to cause any problems for them.

On September 5th, the same day I started as a [REDACTED], Johanne told me that she was going to select two [REDACTED] chapters for her to submit as papers because she had a USDA deadline to submit 2 manuscripts before the end of the fiscal year, September 30th. I was worried because a chapter is hard enough but a paper takes much more time and she needed to have 2 in less than a month. Again, she showed that she cares now because is a USDA deadline and not because I was [REDACTED]. I ended up working 50-60 hours for her in the lab, and this is when I had the worst experience. I was supposed to use my other week hours (after job) and weekends to work [REDACTED].

[REDACTED] Papers can be completed once you are done and gone. I ended up working [REDACTED] in one of her projects and also working with these papers during the other week hours, nights and weekends. I told her that I needed to have time for me to [REDACTED] and she insulted me telling me that she has these USDA deadlines, and that I should be thankful that she chooses my papers instead of others, and that she pays me as [REDACTED]. Again, more reasons to be very afraid of USDA, thinking that I was going to be punished or something. [REDACTED]. I was [REDACTED] because I needed to work [REDACTED], the papers, [REDACTED]. I started also getting emails all the time from Johanne asking me to do so many things for the papers and she wanted to have them done in few hours or literally at the moment. This was harassment, and I kept getting those emails in my off-hours and she was asking me to do things for her *asap*. There were times that I needed to stop any personal activity and go to the lab in order to get something done for her. The harassment got worst and if I didn't reply the email in the next 10 min, she started texting me and telling me to check the email and to do whatever she was requesting at the moment. This is when I started [REDACTED] because [REDACTED].

[REDACTED] after hearing the text tone because I knew it was Johanne. I have evidence of the number of hours I worked for her and also what was said in those emails, and I sent this to [REDACTED] in Madison. They were upset with her, collected the hours and at the end I got paid, [REDACTED]. I presented this evidence after [REDACTED] and her lab. We submitted the papers on September 28th and September 30th, however, she submitted a form about manuscript submission to the USDA around mid-September and this apparently said when the paper was submitted and to what journal, but we didn't submit the papers until the end of September, and it is very likely that she wrote another date in that form.

The last two weeks of September [REDACTED] were the worst. The chair and my committee members [REDACTED] and they were worried. Johanne then later told me that

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she was not going to allow me to use those papers [REDACTED], and in science you can. She said this because she feels that because she edited them, I can't use them. That's unethical and it is removing my right to use my own project. She went around telling professors that she wrote the papers, which is not true, because I wrote those and she edited/added/removed things them as any professor/advisor is supposed to do. Then she asked these professors if it is ok for the students to use "her papers" and they said that if he (me) wrote those, then he can use them, and that this is what all the departments do. She was very upset that these professors told her this, and she came angry back to the lab and called me to her office and told me that she doesn't think that I was going to be capable of [REDACTED] and that I needed to think again if I was going to use the papers because my committee was not going to be happy about this and they were going to "come for me". This was bullying. I couldn't believe that [REDACTED] is putting you down and I [REDACTED]. The next day I talked to my committee members and told them what Johanne said and they were very angry because they never said that they were going to "come for me", and that they know what kind of person and scientist I am.

After we submitted the papers, I was still in Johanne's lab and I was getting ready for [REDACTED] [REDACTED] although I knew this was going to be again impossible because I spent all my time for her USDA deadlines. On Saturday, September 30th, when the last paper was submitted, I decided to send [REDACTED] and her because they need to ready this [REDACTED] prior [REDACTED]. The next [REDACTED] Johanne sent an email to all the committee saying to disregard what I said and that she didn't approve this. She also sent me an insulting email to me. I emailed my committee (except her) and the chair, showing the evidence of her abuse and how impossible she was making me from finishing. The constant emails-harassments continue, and on [REDACTED], I woke up with a feeling [REDACTED] [REDACTED] decided to talk to the chair of the department and she saw me devastated, she cried and she told me that you can't return there [REDACTED]. She was sharing all this with the University [REDACTED] so they were informed. I was able to [REDACTED] and the chair of the Department, Susan Paskewitz, [REDACTED], and I was able to finish my degree. I successfully passed [REDACTED] [REDACTED] and Johanne was not allowed to be there. I will always be forever grateful from the support of Susan and my committee. [REDACTED] because Susan [REDACTED] [REDACTED] and since then, I have been [REDACTED], but I'm glad [REDACTED]. On [REDACTED] I also [REDACTED] and started the process of reporting her.

14. Did you get paid for the time you worked?

I told [REDACTED] why I was quitting and showed the evidence, so they eventually paid for the time I worked.

15. What happened to the work?

Sept 28 and Sept 30, we submitted the papers. They were rejected from Annals of Botany, and now we are trying to start working on those again but is not easy. I won't give up my papers but I'm also [REDACTED] every time I see them because it creates flashbacks to September [REDACTED]. [REDACTED] this and is getting better.

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16. Were you co-author or published with the research you did?

There are supposed to be 4 papers. Two were submitted but were rejected. I still have little contact with her because of the papers (only like a couple emails). In the past, Johanne has been known for removing scientists from papers or change them from first author to second author. I am and I should be 1st author in all these papers because this was [REDACTED], and I'm afraid that she may change me from first to second author. She has gone to conferences and use some the data from students or mine, and we she comes back and we see the poster, we get upset that we are only in her acknowledgement section and not in the authors. Recently, she went to a conference and used some data from one of my chapters and didn't even mention my name. She didn't give me credit or to the other scientists involved in this project.

Regarding papers, one of my committee members, who is a [REDACTED] saw [REDACTED], and he realized that he was not a co-author of one of the chapters. He was not happy seeing this and I was confused. I know we got some plants from him in order to do one of my projects but I didn't know that before I started [REDACTED], this scientist ([REDACTED]) and another one ([REDACTED]) created these plants specifically for Johanne and they needed to be part of the paper. I completely agree, and I talked to them and they said that they understand that I was unaware of this, [REDACTED]. I reported this to the University as well and now that the paper was rejected, Johanne needs to include them as it should be. They are included [REDACTED] for sure.

17. When was the presentation?

January [REDACTED]. Anytime she goes to a conference and she use some of our data, most of the time she doesn't have our name on the presentation as author, but we may be in acknowledgments.

18. Did you talk with the University?

Yes, I couldn't [REDACTED] with her. I did a report with [REDACTED] the University. By doing the report in the University, I opened the door for many victims from horticulture and entomology (~20 people), to actually come forward and also testify what they experienced. People were very afraid, when similar things happened to them, to file a report but now they had the opportunity to share their specific stories. Some of these people also contacted the USDA in Madison and gave their testimony. There are multiple investigations happening at the moment, either USDA or UW-Madison, and all the victims, including myself, are waiting to see justice.

I also talked to the Department and University because she also started being insulting and disrespectful to me in front of others. [REDACTED], [REDACTED], she made fun of the situation and called my family dumb (they live there). This happened at the end of [REDACTED] and we were in a lab meeting. I left and crying and went immediately to the chair office to report this.

19. Did she see you crying?

Not sure, probably yes.

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20. What did she say?

██████████ at the beginning of the lab meeting, asked if I have heard from my family. I said no. First, I was very affected and weak from the continuous harassment from Johanne, and then then I was also anxious from not having communication with my family. When Johanne heard that what ██████████ said, Johanne asked if they (my family) left their houses for a refuge center, and I said: "I don't know, probably not", and she said: "well, their problem, they're dumb". I told her that what she said was not ok, but she said: "well, is the true, they are part of the problem if they stay there". The lab members were disgusted hearing how she was talking about my family, and another ██████████ (who also reported her) told her that this is not okay. I left the room and cried because obviously I didn't know about my family and they were getting insulted in my face.

In the next lab meeting, one week after her comments about my family, she threatened me to not use my own research ██████████ in front of the other lab members. She said she gave me feedback and gave me some parts but that I couldn't use that (I have evidence that I've been working ██████████). In that lab meeting I told her that I don't agree with that and that I have the right to use my research/papers. She said: "I won't talk more about that, it is what it is", and I said: "but no, I work hard for this". She interrupted me and told me to be quiet but pointing at me and with high tone". I was ashamed and insulted in front of others. Again, I reported this to the department.

21. Dr. Brunet said she was purposely manipulating?

When she talks to D.C. about grants, and they don't agree with her, she would say, I'm a woman... She told someone that you are discriminating against me because I'm a woman. We all have heard of these conversations. She told us (██████████) what she was saying, and that telling them that they are discriminating against her because she is a woman, will scare a bit some people from the USDA and that they will leave her alone. I was in her office when she said that one, and she has mentioned this to ██████████.

22. What contact have you had with Dr. Brunet since your time in her lab?

The only contact I had was in January ██████████, because one of the papers got rejected and she sent me the comments. Recently, one of the collaborators from another paper asked for the update (the second one rejected), and she sent us the comments and told us that we can work in the paper together and later in April give it to her. I haven't finished the revisions from the first paper rejected in January ██████████ because I get ██████████. I can't look at my own research because of the way it makes me feel. ██████████. I don't want this to happen to anyone else in the future.

23. How many people has she affected this way?

Around 20: graduate students, postdocs, technicians and professors. I know what happened with different graduate students, postdocs and technicians, and I know that she has many conflicts with different professors, but entomology knows more about that. I only know that she came sometimes to the lab saying bad things about other people (either USDA or UW-Madison).

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24. Is there anything else that you would like to tell us?

I came forward because I don't want anyone else to go through what I have been through. Many of us, including myself, are looking for action and justice here. We don't want to see another student or staff member going through this and [REDACTED]. We (again including myself) do not support any harassment, bullying, discrimination, hostile work environment and abuse (mental or physical). This is very serious and has been going on for years. Many of our lives are affected and we still struggle every day. This was only my statement, but you will have similar words from any of the other victims. Thank you for your understanding and for taking this very seriously.

I solemnly affirm that the testimony in this statement is true and accurate to the best of my knowledge.

Print Name

Signature

Date

Note by AC Palmenberg, added 5/18/18: [REDACTED] informed me this phone interview with [REDACTED] took place on [REDACTED] at 9:00 am MT (11:00 am EST). He signed and returned the transcript on [REDACTED]. The redacted names are by ACP, relative to the UW Provost's investigation witnesses.

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Witness Statement: [REDACTED]

This document is intended to memorialize my observations regarding a meeting I attended on [REDACTED] at the University of Wisconsin campus. The meeting, which began at approximately 6:00 pm, had been agreed to by [REDACTED] at my request to discuss the current state of [REDACTED] in Madison. We were informed by [REDACTED] that [REDACTED] was working out of Room 638 Russell Labs, 1630 Linden and suggested we meet there when [REDACTED] work responsibilities would be over. My colleague [REDACTED] and I met [REDACTED] at the appointed time. (We had also met [REDACTED] in [REDACTED] at the same location without incident.) Over the past several years, [REDACTED] has played a leading role in Madison relating to [REDACTED] and we have found [REDACTED] insights invaluable to our current assignment to conduct an independent systemic review of [REDACTED]. The three of us sat in a small office adjacent to the lab where we discussed [REDACTED] matters for approximately 90 minutes.

As our conversation was winding down, a woman appeared from the laboratory area, approached where we were sitting and immediately asked [REDACTED] and I to identify ourselves and explain our reason for being there. We provided her our names. The woman clearly knew [REDACTED] and asked [REDACTED] what we had been talking about. [REDACTED] said that we had been discussing [REDACTED].

The woman (who we were later informed by [REDACTED] was [REDACTED] supervisor but who never identified herself to us and whose name I do not currently recall) very curtly said that our being in the laboratory was completely inappropriate and it was apparent from her tone of voice, words, and body language that she was extremely displeased with having discovered us in the office. [REDACTED] and I explained we were just winding down our conversation and would happily leave. The woman said words to the effect that we would certainly leave and that she was going to remain to ensure that we immediately did so.

We then got up from our seats and the woman escorted us to the elevator and rode down with us. During the elevator ride, the supervisor continued to express her extreme displeasure with [REDACTED] using the laboratory space for other business and providing unauthorized persons access to University work space. The woman said that the laboratory was not the place for [REDACTED] to invite people to have non work-related meetings. During that escort and trip, [REDACTED], while clearly upset with [REDACTED] supervisor's behavior, attempted to de-escalate the situation and suggested that the two of them would need to have a follow up conversation at a later time.

When the elevator arrived at the lobby of the building, the woman left our company and walked out of the building. There was an empty table and chairs nearby and we sat with [REDACTED] [REDACTED] for a brief period of time. It was apparent from [REDACTED] manner, words, and demeanor that [REDACTED] was unsettled by the way [REDACTED] supervisor had acted during the encounter. [REDACTED] apologized for her conduct and we waited for some period of time until [REDACTED] was able to regain [REDACTED] composure. We sat with [REDACTED] a while longer and expressed our regrets that our request for the meeting had resulted in such an incident.

While the supervisor did not raise her voice, it was quite apparent that she was extremely upset and bothered about [REDACTED] providing us a place in the office to sit and talk. It was puzzling and almost disturbing that she had taken such umbrage at what appeared, if anything, a minor transgression and the anger and hostility that she displayed that evening. While most of her enmity was directed towards [REDACTED], as participants in the discourse, [REDACTED] [REDACTED] and I both commented after the encounter how much we had been taken aback by her surprising conduct and manner. Her conduct in our presence could in no regard be considered cordial, civil or professional.

It might also be helpful to know that during our site visits to Madison, we have met several times with various professors, social scientists and University professionals who have graciously allowed us to meet with them in their office space at a number of buildings on the Madison campus to talk about [REDACTED]. Those meetings have all occurred without incident. The same, unfortunately, could not be said about this encounter.

[REDACTED]

Dr. Johanne Brunet
Department of Horticulture
1575 Linden Drive
Madison, WI 53706

Dear Johanne,

I am writing in follow-up to our [REDACTED] meeting with [REDACTED] regarding [REDACTED] under your direction. At this meeting, [REDACTED] alleged you lost your temper and shouted with demeaning verbal comments about [REDACTED], and physically abused [REDACTED] by grabbing, shaking and pushing [REDACTED]. [REDACTED] made comment also about the atmosphere in your laboratory in how others are being treated. At this meeting, you did not dispute these allegations. Additionally, [REDACTED] met with a dean in our college to discuss [REDACTED] situation under your direction. Since I was made aware of the situation I have responsibility as manager of the department to seek assistance to be certain such activities do not occur in the future. I do not have an option to ignore the allegations since I was made aware of them and I am an agent of the department and the university. These allegations are serious and represent violence in the work place.

I request for you to contact [REDACTED] in a timely manner. I spoken with their director about the issues mentioned above and their office will be expecting you to contact them momentarily. [REDACTED] Over the years I have worked with both of them; they are experienced and [REDACTED]. Please inform me of your meetings and resolution. Thank you for your time to address these concerns.

Sincerely

Dennis P. Stimart
Professor and Chair of Department

[REDACTED] [REDACTED]

cc: Goldman, Jahn, [REDACTED], Simon



[REDACTED]

Professor Johanne Brunet
Department of Horticulture
297 Horticulture Building

Dear Johanne:

This letter is intended to clarify and put closure to the discussions related to the incident that occurred on [REDACTED] with [REDACTED] during which it has been alleged that there was physical contact involving your hand on [REDACTED] arm.

I am writing to confirm that, as an institution, we must and have communicated clearly with you in writing that the alleged physical contact is unacceptable behavior. You and I have discussed this and I am confident that you understand the University's policies in this regard.

Second, I am writing to confirm that there is disagreement between you and your Department Chair, Dennis Stimart, regarding the circumstances and the written record that relates to this event and its resolution. In view of this disagreement and the fact that no formal complaint has been received regarding this incident to date, the correspondence related to this incident will not become part of your permanent personnel file. Furthermore, we have agreed that any copy of Dennis's letter be maintained in the general department files and will be accompanied by your written comment already on record and this letter.

With this letter, we consider this matter closed. My staff and I stand ready to assist you and all other parties that have been affected in setting this issue behind us and moving on.

Sincerely,

Molly M. Jahn
Dean and Director

xc: Dennis Stimart
Philipp Simon
ARS HR person: Jean Weinbrenner

MMJ/jrs

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_____. I performed ~30% of the data collection.

Carol Hillmer

From: Philip Mathison <pm@kasieta.com>
Sent: [REDACTED] November 27, [REDACTED] 2:00 PM
To: Benedict Weisse
Cc: Carol Hillmer; Kate VandenBosch; Mark Hazelbaker
Subject: Letter from Attorney Hazelbaker re Johanne Brunet
Attachments: Ltr. to B.Weisse re Johanne Brunet [REDACTED]1127 (00267225xB982A).PDF

Good afternoon,

Attached please find a copy of the letter from Attorney Hazelbaker with respect to Johanne Brunet. A hard copy will follow via first class mail.

Thank you for your kind attention.

Phil

Philip D. Mathison
Legal Assistant
Kasieta Legal Group, LLC
559 D'Onofrio Drive,
Suite 222
Madison, WI 53719-2842
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Received 12/04



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Attorney Mark B Hazelbaker
Circuit Court Commissioner
Direct Line: 608.662.2300
Direct Email: mh@kasieta.com

November 27,

Mr. Ben Weisse
College of Agricultural and Life Sciences
Ag Hall 240 J
Madison, WI 53706

Re: Johanne Brunet

Dear Mr. Weisse:

On behalf of Dr. Brunet, I request that you receive her statements in response to your notes and have no further contact with her concerning these issues. On my advice, Dr. Brunet will not provide additional information or be interviewed unless there are formal charges pending, or you can cite a specific requirement for her to do so. In such a circumstance, we will request that she be given written questions to prepare responses to.

Dr. Brunet is a tenured faculty member with decades of exemplary research experience. Her work has contributed enormously to the study of pollination. Her record in submitting papers to scholarly journals is impeccable.

Academic work is difficult and demands rigorous standards. Dr. Brunet has produced excellent research by adhering to high standards. She has expectations of her graduate students which are commensurate with the world-class caliber of the CALS and the UW-Madison. She does not expect her students to work any harder than she does herself. But she always demonstrates consideration for the personal concerns of her students and others.

Dr. Brunet has not behaved in any inappropriate manner. She emphatically rejects any suggestion that there is anything wrong in her laboratory or her research. Should you wish to communicate with Dr. Brunet concerning this matter, please contact me or my colleague, Attorney Robert J. Kasieta.

Very truly yours,
KASIETA LEGAL GROUP, LLC

A handwritten signature in black ink, appearing to read "Mark B. Hazelbaker".

Mark B. Hazelbaker

cc: Ms. Carol Hillmer, Associate Dean of Human Resources, College of Agricultural and Life Sciences ✓
Dr. Kathryn VanderBosch, Dean, College of Agricultural and Life Sciences
Dr. Johanne Brunet

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