

CHRISTIE'S

EDUCATION | NEW YORK

Annual Security Report 2019

Introduction

The safety and wellbeing of students, faculty and staff have always been an essential concern at Christie's Education (CENY). Located in midtown Manhattan, Christie's Education benefits from the vibrant neighborhood and is committed to the community's safety.

New York State law, Article 129-A of the Education Law requires Christie's Education to provide students with information on security services, procedures, and resources available at school, and to remind you of the need to cooperate in crime prevention.

This report is compiled annually by the Recruitment and Admissions Officer to comply with the Jeanne Clery disclosure of Campus Security Policy and Crime Statistics Act. This report is prepared with Christie's Education's security log and in cooperation with Christie's Security team. Law enforcement did not respond to requests for information this year.

Each year, an e-mail notification is made to all enrolled students that provides the website to access this report. Faculty and staff receive similar notification. Copies of the report may also be obtained in hard copy by making a request at the front counter at Christie's Education. Starting in 2017, students are required to submit a form acknowledging that they have read and understood the report.

For the purpose of this report,

On-campus pertains to: 1230 Avenue of the Americas, 20th and 21st Floors, stairwells, elevators and lobby

Non-campus pertains to: the auction house, 20 Rockefeller Plaza

Public Property pertains to: Avenue of the Americas between 48th and 49th Streets, the sidewalks on the east and west side of the street between 48th and 49th Street and 48th Street between 5th and 6th Avenues, the sidewalks on the north and south side of the street between 5th and 6th Avenues.

I. Security

Christie's Education is open 9am-5pm, Mondays through Thursdays, and 9:30am-5pm on Fridays during the academic year. A Tishman Speyer ID is required to enter the building and Christie's Education ID to enter the school.

If an emergency or crime situation occurs where a person's life is in danger, call 911 immediately. If the emergency or crime takes place at school, please report it to any staff or faculty member. The school will immediately notify the New York City Police Department and will assist any student who wishes to make a complaint to the police.

While at a class at Christie's auction house at Rockefeller Plaza, students may dial Christie's Operator (0) on any of the courtesy phones, who can contact Security by a 2-way radio or speak with any staff member.

Students are strongly encouraged to safeguard their personal belongings at and outside school.

In the case of a large scale emergency and evacuation, all staff and students are to report to the back of 1221 Avenue of the Americas.

Contact info:

Sarah Buccarelli, Continuing Education Coordinator, 212 355 1501 ext. 3315, sbuccarelli@christies.edu

Veronique Chagnon-Burke, Academic Director, 212 355 1501 ext. 3301, vchagnon-burke@christies.edu

Margaret Conklin, Director of Business Affairs and Student Services, 212 355 1501 ext. 3302, mconklin@christies.edu

Suzanne Julig, Career Services Officer, 212 355 1501 ext. 3313, sjulig@christies.edu

Karen Maguire, Learning Resources Manager, 212 355 1501 ext. 3304, kmaguire@christies.edu

Amanda Muscato, Academic and Financial Aid Coordinator, 212 355 1501 ext. 3300, amuscato@christies.edu

Hilary Smith, Associate Director of Recruitment and Admissions, 212 355 1501 ext. 3309, hsmith@christies.edu

Timely Warning Policy

In the event that a situation arises, either on or off campus, that, in the judgment of the Academic Director, the Director of Business Affairs and Student Services or a designated appointee, constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued. The Warning will be issued through e-mail and classroom announcements and the Christie’s Emergency Notification System to all students, faculty and staff.

Threat as used here encompasses but is not limited to the following:

- Fire
- Outbreak of serious illness
- Earthquake
- Severe weather event
- Gas leak
- Terrorist incident
- Armed intruder
- Bomb threat
- Civil unrest or rioting
- Explosion
- Nearby chemical or hazardous waste spill

If the incident that requires a timely warning results in a victim or victims, those people shall not be named as part of the warning.

Preparation of Disclosure of Crime Statistics

Christie’s Education annually prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. This report is prepared in cooperation with Christie’s Security. Local law enforcement is contacted but they did not reply with the request this year. The report is available in hard copy upon request.

How to Report Criminal Offenses

If it is a violent emergency situation, please call 911, and if possible, notify a staff or faculty member. For non-emergency situations please report the offense to a Christie’s Education staff member. An incident report will be completed and a determination by the Academic Director as to whether an investigation is necessary will be made in a timely manner. Furthermore, Christie’s Education will determine whether local law enforcement should be called.

Access

During business hours, Christie's Education will be open to students, parents, employees, contractors, guests and invitees. During non-business hours only employees will have access through use of a key card. 1230 Avenue of the Americas, the building in which Christie's Education was located is open 24 hours a day, seven days a week and has a security guard posted at all times in the lobby.

Campus Law Enforcement

Christie's Education does not have a campus police department, but relies on Christie's Security, Tishman Speyer Security and local law enforcement. Christie's Education employees, Christie's Security and Tishman Speyer Security have the authority to ask persons for identification and to determine whether individuals have lawful business at Christie's Education or Christie's Auction House. Employees and security officers do not possess arrest power. Criminal incidents are referred to the local police who have jurisdiction on campus. All crime victims and witnesses from crimes on campus are strongly encouraged to immediately report the crime to Christie's Education as well as the local police. Prompt reporting will assure timely warnings and timely disclosure of crime statistics.

II. Sexual Assault Prevention and Response

Christie's Education will not tolerate sexual abuse, rape, sexual assault, domestic violence, intimate partner violence, stalking, sexual coercion, or other forms of sexual violence by or against students, staff, faculty, alumni, or visitors.

Please review the Christie's Education Sexual Misconduct Policy and the Title IX Policy for a full understanding of the scope of prevention and response.

For the purpose of this report, the following terms are defined:

Sexual Activity: shall refer to both "sexual act" and "sexual contact" as provided in 18 U.S.C. 2246(2) and 18 U.S.C. 2246(3)-

"sexual act" means—

(A) contact between the penis and the vulva or the penis and the anus, and for purposes of this subparagraph contact involving the penis occurs upon penetration, however slight;

(B) contact between the mouth and the penis, the mouth and the vulva, or the mouth and the anus;

(C) the penetration, however slight, of the anal or genital opening of another by a hand or finger or by any object, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person; or

(D) the intentional touching, not through the clothing, of the genitalia of another person who has not attained the age of 16 years with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person;

"sexual contact" means-

the intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person

Affirmative consent: is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity. Silence or lack of resistance, in and of

itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression."

Consent to any sexual act or prior consensual sexual activity between or with any party does not necessarily constitute consent to any other sexual act. Consent is required regardless of whether the person initiating the act is under the influence of drugs and/or alcohol.

Consent may be initially given but withdrawn at any time.

Consent cannot be given when a person is incapacitated, which occurs when an individual lacks the ability to knowingly choose to participate in sexual activity. Incapacitation may be caused by the lack of consciousness or being asleep, being involuntarily restrained, or if an individual otherwise cannot consent. Depending on the degree of intoxication, someone who is under the influence of alcohol, drugs, or other intoxicants may be incapacitated and therefore unable to consent. Consent cannot be given when it is the result of any coercion, intimidation, force, or threat of harm.

When consent is withdrawn or can no longer be given, sexual activity must stop.

Sexual Assault: Sexual activity without affirmative consent.

Should an assault take place on campus, victims and witnesses are encouraged to call 911. Should a victim wish to speak with someone and seek tools and resources but not report it, confidential resources are available:

Dr. Veronique Chagnon-Burke, Academic Director, 212 355 1501 ext. 3301, vchagnon-burke@christies.edu

Dr. Julie Reiss, Program Director, 212 355 1501 ext. 3307, jreiss@christies.edu

If the victim wishes to report the incident and pursue Code of Conduct charges he or she should contact the Title IX Coordinators:

Margaret Conklin, Title IX Coordinator, Director of Business Affairs and Student Services, 212 355 1501 ext. 3302, mconklin@christies.edu

Hilary Smith, Title IX Coordinator, Associate Director of Recruitment and Admissions, 212 355 1501 ext. 3309, hsmith@christies.edu

Statement Addressing Sex Offender Registration

The Campus Sex Crimes Prevention Act (CSCPA) of 2000 is a federal law that provides for the tracking of convicted sex offenders enrolled at, or employed at, institutions of higher education. The CSCPA is an amendment to the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Act. The federal law requires state law enforcement agencies to provide Christie's Education with a list of registered sex offenders who have indicated that they are either enrolled or employed at Christie's Education.

Christie's Education is required to inform the campus community that a registration list of sex offenders enrolled or employed at Christie's Education will be maintained and available upon request.

In addition, a list of all registered sex offenders in New York is available from the New York State Division of Criminal Justice Services at: <http://www.criminaljustice.ny.gov/nsor/>

The CSCPA further amends the Family Educational Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in the Act can prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders.

Statement Addressing Counselors and Confidential Crime Reporting

All reports, except those protected by confidentiality in the Sexual Misconduct Policy, will be investigated. Christie's Education does not have procedures for voluntary, confidential reporting of crime statistics. Violations of the law will be referred to law enforcement agencies and when appropriate, to the Academic Director for disciplinary action. When a potentially dangerous threat to the university community arises, timely reports or warnings will be issued through email, in-class announcements, and other appropriate means.

Statement Addressing Criminal Activity Off-Campus

Christie's Education does not operate any off-campus housing or off-campus student organization facilities.

Bias-related Crime Prevention Information

It is the policy of the Christie's Education to comply with legal requirements of §6436 of Article 129-A of New York State Education Law (Regulation by Colleges of Conduct on Campuses and Other College Property Used for Educational Purposes). Accordingly, campuses must provide information to incoming students regarding bias-related crime and its prevention.

Christie's Education has established policies and procedures to protect the entire school community from the effects of "Bias Related Crimes."

According to New York Police Department Guidelines, a “Bias Related Crime” or “Hate Crime” is any offense or unlawful act that is motivated in whole or in part by a person’s, a group’s or a place’s identification with a certain race, religion, ethnicity, sexual orientation, disability, gender or age.

To combat this growing threat, a number of laws have been passed to help prevent the occurrence of Hate Crimes. These laws include (A) the following federal legislation: (i) Hate Crimes Prevention Act of 1999; (ii) Church Arson Prevention Act of 1996; (iii) Hate Crimes Sentencing Enhancement Act; and (iv) Hate Crimes Statistical Act of 1990, as well as (B) the New York State Hate Crimes Act of 2000 (Penal Law Article 485).

In order to effectively handle incidents of Bias Related Crimes and prevent future occurrences of such crimes, victims or witnesses of a Hate Crime are encouraged to immediately report the incident to the Academic Director or the Business Manager so that the matter may be reported to relevant law enforcement agencies and thoroughly investigated.

Penalties for the commission of a Hate Crime can range from fines to extended prison sentences based on the specifics of the crime. In addition, students guilty of committing a Hate Crime may be subject to sanctions including, but not limited to, suspension or expulsion from Christie’s Education.

III. Title IX Policy

Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex at any federally funded educational program or activity. It protects victims of sexual or gender-based bullying, harassment or violence.

Consistent with Title IX, Christie's Education does not discriminate against students, faculty or staff based on sex in any of its programs or activities, including but not limited to educational programs, employment, and admissions. Discrimination or harassment of any kind in regards to a person's sex is not tolerated at our institution.

Christie's Education is committed to responding promptly and effectively when it learns of any form of possible discrimination based on sex. The school responds to reports of sexual harassment, including sexual violence, as part of its efforts to stop the harassment and prevent its recurrence of possible sex discrimination. Those believing that they have been harassed or discriminated against on the basis of their sex, including sexual harassment, should immediately contact one of the school's two Title IV Coordinators. When the Title IX Coordinator has notice of this occurrence, Christie's Education is compelled to take immediate and effective corrective action reasonably calculated to stop the harassment, prevent its recurrence and remedy its effects.

This policy applies to all members of the Christie's Education community, including students, faculty and staff, as well as third-parties (i.e. vendors and invitees). Violations of this policy may result in sanctions up to and including termination, dismissal, or expulsion as determined by appropriate school officials.

1. Title IX Coordinators

Christie's Education has designated two Title IV Coordinators to help address issues of sexual and gender-based harassment within the school. The Title IX Coordinators play an integral role in carrying out the school's commitment to a positive learning, teaching and working environment for the entire Christie's Education community. The Title IX Coordinators are a resource for any questions or concerns about sexual harassment, sexual violence, or sexual misconduct and are available to discuss the rights and judicial options of all members of the school community.

Title IX Coordinator:

Margaret Conklin / Vice President, Director of Business Affairs and Student Services
1230 Avenue of the Americas, 20th Floor
New York, NY 10020
Phone: (212) 355-1501, ext. 3302
Email: mconklin@christies.edu

Deputy Title IX Coordinator:

Hilary Smith / Associate Vice President, Associate Director of Recruitment and Admissions

1230 Avenue of the Americas, 20th Floor

New York, NY 10020

Phone: (212) 355-1501, ext. 3309

Email: hsmith@christies.edu

2. Duty to Report, Cooperate and Facilitate

Any member of the Christie's Education community including students, faculty, employees and third-parties are encouraged to report violations of this policy where individuals know, or should know, of accusations or actions which violate Christie's Education policy and should notify the Title IX Coordinators of such violations promptly.

All members of the Christie's Education community are encouraged to cooperate fully with any investigations of discrimination or harassment. Likewise, all Christie's Education employees, except those designated as confidential, are required to ensure that complaints about discrimination, harassment, or retaliation are directed to the Title IX Coordinators for evaluation and investigation

3. Complaint Process

Complaints concerning sexual harassment and/or sexual discrimination should be sent to Margaret Conklin, Title IX Coordinator, 1230 Avenue of the Americas, 20th Floor, New York, NY 10020, mconklin@christies.edu, 212-355-1501, ext. 3302 or, alternatively, to Hilary Smith at hsmith@christies.edu and 212-355-1501, ext. 3309.

Initiating a Complaint: Reporting individuals have the right to make a report to security, local law enforcement, and/or state police, or choose not to report; to report the incident to CE; to be protected by CE from retaliation for reporting an incident; and to receive assistance and resources from CE. CE encourages individuals who have experienced sexual harassment, gender-based harassment or sexual violence to report the incident(s) to campus authorities, even if they have reported the incident to outside law enforcement. Notifying CE will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers. Should the reporting individual wish to move forward with legal or code of conduct processes, CE will start an investigation within 48 hours of the reporting. Such reporting will allow the reporting individual to get the support he or she needs, and provide CE with the information it needs to take appropriate action. However, individuals should be aware that there are employees with whom they can speak on a strictly confidential basis before determining whether to make a report- those designations are listed in the Statement of Privacy and Confidentiality in the Sexual Misconduct Policy.

CE will seek consent from reporting individuals prior to conducting an investigation. Declining to consent to an investigation shall be honored unless CE determines in good faith that failure to investigate does not adequately mitigate a potential risk of harm to the reporting individual or other members of the community. Honoring such a request may limit CE's ability to meaningfully investigate

and pursue conduct action against and accused individual. Factors used to determine whether to honor such a request include, but are not limited to:

- Whether the accused has a history of violent behavior or is a repeat offender
- Whether the incident represents escalation in unlawful conduct on behalf of the accused from previously noted behavior
- The increased risk that the accused will commit additional acts of violence
- Whether the accused used a weapon or force
- Whether the reporting individual is a minor
- Whether CE possesses other means to obtain evidence such as security footage, and whether available information reveals a pattern of perpetration at a given location or by a particular group

Please note, that in the case that an individual discloses information through a public awareness event such as a candlelight vigil, protest or other public event, CE is not obligated to begin an investigation based on such information. CE may use this information to inform its efforts for additional education and prevention efforts.

Reporting individuals have the right to withdraw a complaint or involvement from the institution process at any time.

Timeframe for Filing a Complaint: Formal Complaints should be submitted within the latter of the following two dates: a) 30 days after the alleged misconduct, or b) by the end of the term in which the alleged incident took place. While prompt reporting of the incident is encouraged, complaints older than 30 days, or in a later term, will still be processed.

Initial Review and Meeting: After the receipt of a formal complaint, the Title IX Coordinator will meet with the complainant as soon as possible, but no later than 30 days after receipt of the complaint. The complainant must make himself/herself available for this meeting. After this meeting, the Title IX Coordinator and other designated school officials will determine whether to begin an investigation and will inform the complainant of that decision within 30 days.

No Contact Order

Should the decision be made to investigate a “No Contact Order” will be put in place if the respondent is a student or employee. Continued intentional contact with the reporting individual would be a violation of institutional policy and may be subject to additional conduct charges; if the accused or respondent and a reporting individual observe each other in a public place, it shall be the responsibility of the respondent to leave the area immediately and without directly contacting the reporting individual. Both the respondent and the reporting individual shall, upon request and consistent with institutional policies and procedures, be afforded a prompt review, reasonable under the circumstances, of the need for and terms of a no contact order, including potential modification, and shall be allowed to submit evidence in support of his or her request. Due to the nature of the programs at Christie’s Education and space constraints, the responder may

be put on temporary leave while the investigation is carried out.

Investigation: The institution will conduct an investigation when it becomes aware that sexual harassment, gender-based harassment or sexual violence may have been committed against a student, employee or visitor, unless the reporting student has requested that CE refrain from such an investigation and CE has determined that it may do so.

The Title IX Coordinator is responsible for conducting the investigation in a prompt, thorough, and impartial manner. The college Title IX Coordinator shall inform the reporting individual that an investigation is being commenced and shall inform the respondent of the allegations of the reporting individual. If there is a written complaint, the respondent shall be provided with a copy of the complaint unless circumstances prohibit this. The Title IX Coordinator shall coordinate investigative efforts with CE's administration, and may designate another trained individual to conduct all or part of the investigation.

The college Title IX Coordinator shall take prompt and effective steps reasonably calculated to end any sexual harassment, gender-based harassment or sexual violence, including:

1. taking interim measures;
2. preventing retaliation;
3. providing the reporting individual and the respondent with periodic status updates and notice of outcomes of the investigation;
4. informing the reporting individual of her/his right to file a criminal complaint;
5. coordinating with law enforcement agencies, as appropriate,
6. maintaining all documents of the investigation;
7. drafting a report of findings, which is to be submitted to the College President.

Confidentiality: All CE employees, except the Academic Director and MCAM Program Director, are responsible for redressing and immediately reporting actual or suspected discrimination, harassment, or sexual and gender-based misconduct to appropriate officials. CE is committed to protecting the privacy of all individuals involved in a report under this policy.

CE is also committed to providing assistance to help reporting Individuals make informed choices. With any report under this policy, CE will make reasonable efforts to protect the privacy interests of the individuals involved in a manner consistent with the need for a careful assessment of the allegation and reasonable steps available to eliminate the reported conduct, prevent future incidents and address its effects.

Privacy and confidentiality have distinct meanings under this policy.

Privacy: Privacy generally means that information related to a report of misconduct will be shared with a limited group of individuals considered "need-to-know" in order to assist in the active review and investigation of the misconduct. While not bound by confidentiality, these individuals will be discreet and respect the privacy of all individuals involved in the process. All CE employees who cannot guarantee confidentiality will maintain Reporting Individuals' privacy to the greatest extent possible.

The information provided to a non-confidential resource will be relayed only as necessary for the Title IX Coordinator or designee to investigate and/or seek a resolution.

Confidentiality: Confidentiality means that information shared by an individual with designated campus or community professionals cannot be revealed to any other individual without express permission of the individual, or as otherwise permitted by law. Campus and community professionals designated as such include medical providers, mental health providers, and ordained clergy, all of whom normally have privileged confidentiality that is recognized by the law. These individuals are prohibited from breaking confidentiality unless (i) given permission to do so by the person who disclosed the information; (ii) there is an imminent threat of harm to self or others; (iii) the conduct involves suspected abuse of a minor under the age of 18, or (iv) otherwise required or permitted by law or court order.

Non-Confidential/Not Private: Any other CE employee who is not designated as a confidential resource under this policy is required to share a report of sexual and gender-based misconduct with the Title IX Coordinator or designee. The Title IX Coordinator or designee will conduct an initial assessment of the conduct, the reporting Individual's desired course of action, and the necessity for any accommodations to protect the safety of the reporting Individual or the community. The goal is to eliminate any hostile environment.

All CE proceedings are conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, Violence Against Women Act (VAWA), New York's Enough is Enough law and other state and local laws, and Institute policy. No information shall be released from such proceedings except as required or permitted by law and CE policy.

Coordination with Law Enforcement Authorities: In the event that an allegation includes behavior or actions that are under review by law enforcement authorities, the investigative team will, in light of status updates from law enforcement authorities, assess and reassess the timing of the investigation under the Title IX policy so that it does not compromise the criminal investigation.

Conclusion of the Investigation:

Following the completion of the investigation, the Title IX Coordinator or designee set by the Academic Director shall report his or her findings to the Academic Director in writing. Following such report, the Academic Director shall review the complaint investigation report and authorize such action as she/he deems necessary to address the issues raised by the findings. A copy of the report shall be maintained in the files of the Title IX Coordinator.

Appeal: Both the Respondent and the Complainant may appeal the decision of the investigative team to the Title IX Coordinator based on the following grounds:

- a) A procedural error occurred, which may change the outcome of the decision; or
- b) The appellant has substantive and relevant new information that was not available at the time of the investigation that may change the outcome of the decision.

Disagreement with the investigative team's findings or determination is not, by itself, a ground for appeal.

Appeals must be received by the Title IX Coordinator within 1 week of the date of the final report. Appeals will be decided within 2 weeks and parties will be informed of the outcome in writing.

4. Retaliation

Retaliation against any individual for raising an allegation of sexual or gender-based harassment, for cooperating in an investigation of such a complaint, or for opposing discriminatory practices is prohibited.

5. Resources

U.S. Dept. of Education, Office for Civil Rights

<http://www2.ed.gov/about/offices/list/ocr/index.html>

U.S. Equal Employment Opportunity Commission

<http://www.eeoc.gov/>

New York Commission On Human Rights

<http://www.nyc.gov/html/cchr/html/home/home.shtml>

IV. Student's Bill of Rights

CE students, who experience campus-related sexual or gender-based harassment or sexual violence, including sexual assault, stalking, domestic violence, intimate partner violence or dating violence, are entitled to the following rights:

1. Make a report to local law enforcement and/or state police;
2. Have disclosures of domestic violence, dating violence, stalking, and sexual assault treated seriously;
3. Make a decision about whether or not to disclose a crime or violation and participate in the judicial or conduct process and/or criminal justice process free from pressure by the institution;
4. Participate in a process that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard;
5. Be treated with dignity and to receive from the institution courteous, fair, and respectful health care and counseling services, where available;
6. Be free from any suggestion that the reporting individual is at fault when these crimes and violations are committed, or should have acted in a different manner to avoid such crimes or violations;
7. Describe the incident to as few institution representatives as practicable and not be required to unnecessarily repeat a description of the incident;
8. Be protected from retaliation by the institution, any student, the accused and/or the respondent, and/or their friends, family and acquaintances within the jurisdiction of the institution;
9. Access to at least one level of appeal of a determination;

10. Be accompanied by an advisor of choice who may assist and advise a reporting individual, accused, or respondent throughout the judicial or conduct process including during all meetings and hearings related to such process; and
11. Exercise civil rights and practice of religion without interference by the investigative, criminal justice, or judicial or conduct process of the institution.

V. Drug and Alcohol Policy

Christie's Education is committed to creating a safe and healthy academic environment for its students, faculty and staff. The school expressly prohibits the unlawful possession, use, or distribution of drugs and alcohol by students, faculty, or staff members on school property, or while conducting school business off-premises. Members of the school community are responsible for complying with federal, state, and local laws on the possession, use, and sale of alcohol and illicit drugs. Those who violate such laws will be subject to discipline, up to and including expulsion.

General Policies

1. The unlawful manufacture, distribution, dispensing, possession or improper use of either illicit or prescription drugs, or alcohol is prohibited.
2. Students and others who have demonstrated a repeated abuse of alcohol will be referred to appropriate counseling services.
3. Disruptive behavior, inappropriate behavior or intoxication caused by drugs or alcohol use will not be tolerated. Violators are subject to removal from campus and disciplinary action.
4. All members of the Christie's Education community, including staff and faculty, must abide by the terms of this policy.
5. Violations of the policies, rules and standards adopted by Christie's Education concerning substance abuse should be reported to Christie's Human Resources Department when the violation involves an employee. Student-related reports should be made to the Business Manager for Christie's Education.
6. Any member of the Christie's Education community found to be in violation of this policy will be subject to disciplinary action, which may range from referral for counseling, disciplinary probation, suspension or dismissal from the school or employment, based on the merits of the case.
7. Any student convicted under federal, state or local law applicable to the policy stated above (No. 1) must report said conviction to the Business Manager within five days.
8. According to federal regulations, students convicted for a drug offense that occurred during a period of enrollment while they were receiving Title IV Federal Financial Aid, may lose eligibility for Federal Aid.

Rules Governing the Use of Alcohol

1. Students are not permitted to bring alcoholic beverages anywhere on school grounds, the auction house facilities or sites visited during field studies.
2. Alcoholic beverages may be provided only through Christie's Education for special events, including but not limited to the graduation reception and alumni events. No other alcoholic beverages may be brought onto campus or served.
3. When alcoholic beverages are provided on campus, food and non-alcoholic beverages must also be made available.

Christie's Education Sanctions for Violation of these Policies, Rules and Standards

1. Students charged with violations of this policy shall be referred to the Academic Director and Business Manager and outcomes of disciplinary proceedings may result in the following determinations:

- Dismissal of charges, student found not responsible
- Student found responsible and sanctions imposed

Depending on the merits of the case, possible sanctions may include:

- Referral for substance abuse assessment, counseling and/or treatment
- Probation
- Loss of privileges
- Suspension from Christie's Education
- Expulsion from Christie's Education

In addition to school sanctions, the Academic Director and Business Manager, or a designated representative, may refer the students to appropriate governmental authorities when the student's activity is in clear violation of federal, state or local laws.

Employees suspected of violating these policies, rules and standards, or convicted under a federal, state or local drug or alcohol statute, shall be subject to review in accordance with human resources policies and in compliance with all federal, state and local laws. Such a review may result in the following findings:

- Dismissal of charges
- Official warning or other appropriate discipline/action

Employees should refer to the Christie's Employee handbook for details on employee conduct and work rules pertaining to drugs and alcohol. Additional information can also be obtained by contacting a Human Resources representative at Christie's.

Policy for alcohol and/or drug use amnesty

The Health and Safety of every student at CE is of the utmost importance. CE recognizes that students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that violence, including but not limited to domestic violence, dating violence, stalking or sexual assault occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct. CE strongly encourages students to report instances of sexual misconduct to institution officials or law enforcement. A bystander acting in good faith or a reporting individual acting in good faith that discloses an incident of sexual misconduct to officials or law enforcement will not be subject to CE's code of conduct action for violations of alcohol and/or drug use policies occurring at or near the time of the commission of sexual misconduct.

Statement addressing Substance Abuse Education

Christie's Education does not provide on campus substance abuse education or counseling services for students, but students are provided with resources for both services during orientation week and in the student handbook.

Employees with questions or concerns about substance dependency or abuse are encouraged to use resources of the Employee Assistance Program (EAP). The EAP may be reached by calling toll free (877) 243-6215. They may also wish to discuss these matters with their managers or the Human Resources Department to receive assistance or referrals to appropriate resources in the community.

Employees with drug or alcohol problems may be eligible to participate in a rehabilitation or treatment program through Christie's health insurance benefit coverage.

Local, State and Federal Sanctions

The sale and use of alcoholic beverages are subject to the New York Alcoholic Beverage Control (ABC) Law, Vehicle and Traffic (V & T) Law, and Penal Law, as well as municipal ordinances. The most common offenses and penalties are:

1. Open Container: Local municipalities usually prohibit the consumption of, or possession of an open container with the intent to consume, an alcoholic beverage in any public place or on private property

without the owner's permission. Violations are punishable, for example, by a fine of up to \$150 and/or up to 15 days in jail.

2. Minor in Possession: Any person under age 21 who is found to be in possession of alcohol with the intent to consume it may be punished by a fine of up to \$50 and/or required to complete an alcohol awareness program and/or to provide up to 30 hours of community service. ABC Law 65-c.

3. Providing False Identification: A person under 21 who presents false written evidence of age for the purpose of purchasing or attempting to purchase any alcoholic beverage, may be punished by a fine of up to \$100, community service of up to 30 hours, and/or completion of an alcohol awareness program.

ABC Law, 65-b(1). If a New York driver's license was used as the false identification, the court may suspend the violator's license for 90 days. ABC Law, ' 65-b(3). In addition, since the ABC Law now requires sellers of alcoholic beverages to demand a driver's license, passport, or armed forces ID card as evidence of age, the consequences of altering one of the required forms of official ID to do so is more serious. Possession of a forged instrument with the intent to defraud is a Class D felony, punishable by a fine up to \$5,000, imprisonment up to 7 years, or both. Penal Law, 170.25. Nonresidents of New York may apply for a State "Non-driver Identification Card" in lieu of a driver's license. Applications are available at any Motor Vehicle Office.

4. Furnishing Alcohol to a Person Under Age 21: No person may sell, deliver or give an alcoholic beverage to a person actually or apparently under the age of 21. (The Law does not apply to the parent of a minor). Penal Law, 260.20(2) and ABC Law, 65(1). Individuals violating this law are guilty of a Class A misdemeanor, and may be subject to a fine not exceeding \$1000, a term of imprisonment not to exceed 1 year, or both. ABC Law, 130(3) and (5) and Penal Law 70.15(1)(a), 80.05(1).

5. Liability for Injury Caused by Furnishing Alcohol to Persons Under 21: Any person who shall be injured in person, property, means of support, or otherwise by reason of the intoxication or impairment of ability of any person under the age of 21 years shall have a right of action to recover actual damages against any person who knowingly causes such intoxication or impairment of ability by unlawfully furnishing to or unlawfully assisting in procuring alcoholic beverages for such person with knowledge or reasonable cause to believe that such person was under the age of 21 years. General Obligations Law, 11-100 (1).

6. Selling Alcohol to an Intoxicated Person: No person shall sell, deliver or give an alcoholic beverage to a visibly intoxicated person. ABC Law, 65 (2).

7. Liability For Injury Caused By Sale of Alcohol to any Intoxicated Person: Any person who shall be injured in person, property, means of support, or otherwise by any intoxicated person, or by reason of the intoxication of any person shall have a right of action against any person who shall, by unlawfully selling to or unlawfully assisting in procuring liquor for such intoxicated person, have caused or contributed to such intoxication; and in any such action such person shall have a right to recover actual and exemplary damages. General Obligations Law, 11-101(1).

8. Driving While Intoxicated: Operating a motor vehicle while intoxicated, as determined by a blood-alcohol test result of .10% or higher, is a misdemeanor.

VI. Fire Drills and Fire Safety

Fire drills are held throughout the year and it is mandatory to participate if you are in the building. All students should make themselves familiar with the two emergency exit stairwells in the hallway. If there is a fire emergency, the meeting place for all Christie's Education staff and students will be the back of 1221 Avenue of the Americas.

VI. Crime Statistics for 2017, 2016 and 2015

Offense	Year	On-Campus Property	Noncampus Property	Public Property
Murder/ Non-negligent Manslaughter	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Negligent Manslaughter	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Rape	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Fondling	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Incest	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Statutory Rape	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Robbery	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Aggravated Assault	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Assault	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Harassment	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Burglary	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Grand Larceny	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Petit Larceny	2016	0	0	unavailable
	2017	0	0	unavailable

	2018	0	0	unavailable
Motor Vehicle Theft	2016	0	0	unavailable
	2016	0	0	unavailable
	2017	0	0	unavailable
Arson	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Forgery	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Arrests: Weapons	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Disciplinary referrals: weapons	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Arrests: drug abuse	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Disciplinary referrals: drug abuse	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Arrests: Liquor law violations	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Disciplinary referrals: liquor law violations	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Arrests: Criminal possession of stolen property	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Arrests: Unlicensed operation of a motor vehicle	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Criminal Mischief	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable
Offense against public order and decency	2016	0	0	unavailable
	2017	0	0	unavailable
	2018	0	0	unavailable