

DONALD JULIAN REAVES, Ph.D.



CHANCELLOR

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November 21, 2013

Mrs. Terri Steeb-Gronau
Vice President, Division II
The National Collegiate Athletic Association
700 W. Washington Street
Post Office Box 6222
Indianapolis, Indiana 46206-6222

Ms. Jacqie Carpenter
Commissioner
Central Intercollegiate Athletic Association
22 Enterprise Parkway, Suite 210
Hampton, Virginia 23666

**Re: Complaint against Virginia State University
CIAA Football Championship Game Incident
November 15, 2013**

Dear Vice President Steeb-Gronau and Commissioner Carpenter:

This letter serves as a formal complaint against Virginia State University ("VSU"), a Division II member, for the failure of VSU, its staff members and certain of its student athletes, to conform to the obligations of membership in the NCAA and CIAA. Winston-Salem State University's ("WSSU") preliminary investigation, which is still ongoing, reveals that as many as five (5) Virginia State University football players assaulted Rudy Johnson, the starting quarterback for WSSU, in the bathroom on the WSSU campus during the CIAA Championship Luncheon on Friday, November 15, 2013. We believe that the actions of Virginia State University and VSU student athletes, along with the apparent failure of VSU staff members and coaches to properly supervise and constrain VSU student athletes, likely constitute **major violations** of NCAA and CIAA rules. Accordingly, WSSU requests a full investigation of this matter and, depending on the outcome of the investigation, imposition of appropriate penalties to address any violations of NCAA rules.

The results of WSSU's preliminary investigation suggests that one or more VSU student athletes attempted to create an extensive competitive advantage by eliminating the starting quarterback from championship competition play, thereby increasing Virginia

WINSTON-SALEM STATE UNIVERSITY

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State University's chances for a victory and a guaranteed berth to the Division II postseason championship playoffs. WSSU's investigation has also revealed that Virginia State University appears to have failed to maintain adequate control over its players, in that Virginia State University's 55 players traveled to Winston-Salem unaccompanied by VSU's President, its Athletic Director, or a senior administrator. Rather, VSU's student-athletes were left under the supervision of a head coach with a criminal record. (See criminal record attached.) Based on the facts and circumstances surrounding the violent attack on WSSU's quarterback, it is apparent that the assault may not have occurred if VSU had taken reasonable, necessary and prudent steps to appropriately supervise its student-athletes.

Winston-Salem State pledges its full cooperation to the investigation and expects the same from Virginia State University, in accordance with NCAA rules. In light of the circumstances, including the ancillary damages, WSSU requests that:

1. the NCAA and CIAA launch a full investigation into the incident; and
2. the NCAA and CIAA require full cooperation from all entities, including Virginia State University, its staff, coaches and student athletes, consistent with NCAA and conference rules.

Based on the results of the investigation, WSSU requests imposition of any and all appropriate team and/or individual sanctions including, but not limited to, the following:

1. CIAA declare that the actions of Virginia State University shall result in a forfeiture of the CIAA Championship football game;
2. CIAA officially declare Winston-Salem State University as the CIAA Champions, with all of the rights and privileges afforded thereto;
3. NCAA and CIAA impose financial sanctions solely against Virginia State University for loss of income, revenue, and preparation costs to Winston-Salem State University, the host institution;
4. NCAA and CIAA censure Coach Latrell Scott for his irresponsible comments relating to the assault, and for his lack of professional decorum during the height of the melee, and his refusal to obey the order of a police official;
5. NCAA and CIAA impose team and/or individual penalties, in addition to the 2013 ban from postseason play, against Virginia State University, commensurate with the egregious actions of its players, up to and including probation, loss of scholarships, and an additional ban of future postseason play; and
6. NCAA and CIAA order Virginia State University to cover all medical costs related to the injuries sustained by Rudy Johnson as a direct result of being assaulted by Virginia State University football players.

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Winston-Salem State University's investigation into this matter will continue and I want to reiterate our commitment to cooperating with both the NCAA and the CIAA.

Sincerely,



Donald Julian Reaves, Ph.D.

DJR/clkl

Enclosure

cc: Keith T. Miller, Ph.D., President, Virginia State University
Harry Black, Rector, Virginia State University Board of Visitors
Debra B. Miller, Chair, WSSU Board of Trustees
Peter Hans, Chair, UNC Board of Governors