



Tuana European Beauty Academy, LLC

Annual Security Report

TABLE OF CONTENTS

Annual Security Report.....	3
Preparation of Annual Security Report.....	3
Campus Security Authorities and Campuses Personnel.....	3
Procedure on Reporting a Crime or Emergency.....	3
Emergency Evacuation Plan.....	4
First Aid.....	4
Timely Warnings.....	4
Building Security and Access Policy.....	5
Security Awareness and Prevention of Criminal Activity.....	5
Preventing Dating Violence, Domestic Violence, Sexual Assault & Stalking.....	5
Prevention And Education.....	7
Confidentially.....	7
Victim Services.....	8
Campus Disciplinary Actions.....	8
Restraining Orders.....	10
Sex Offender Registration Program.....	10
Crime Definitions.....	10
Monitoring Off Campus Locations of Recognized Student Organizations.....	12
Crime Statistics.....	13
Emergency Response Plan.....	14
Additional Recourses.....	14
Drug Free Workplace Policy.....	16
Introduction.....	17
Health Risks.....	17
Laws Relating to Drug Violations.....	20
Policy Distribution Procedures.....	20
Drug Schedules and Penalties.....	21
Student Loan Code of Conduct.....	23

ANNUAL SECURITY REPORT

PREPARATION OF THE ANNUAL SECURITY REPORT

This Annual report is prepared Denise Mitchell, in cooperation with local law enforcement authorities and includes information provided by them as well as by the campus staff. This information will be updated and provided to students via the student handbook every January, posting to student information board, and via the web site www.tuanaacademy.com. Staff will receive notification at the annual staff meeting. Hard copies of the report may also be obtained at no cost at the admission office.

CAMPUS SECURITY AUTHORITIES AND CAMPUSES PERSONNEL

Tuana European Beauty Academy, LLC does not maintain a separate police department. We work closely with the local law enforcement agencies and police departments that have jurisdiction over the campus. If a crime happens to you or your property or if there is an emergency occurring on campus, contact the designated Campus Security Authority or any available administrator.

Campus Security Authority

Denise Mitchell – Tuana European Beauty Academy - 970-472-2004

PROCEDURE ON REPORTING A CRIME OR EMERGENCY

To report a crime:

For non-emergencies contact the appropriate campus security authority identified above or dial 911 (emergencies only). If you are the victim of a crime and do not want to pursue action within the Academy's structure or the criminal justice system, you may still want to consider making a confidential report. With your permission, the Campus authority can file a report on the details of the incident without revealing your identity.

The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the Academy can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime regarding allocation, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution. The Academy encourages accurate and prompt reporting of all crimes to the Campus authority's office or to local law enforcement authorities where the crime occurred.

Report a Hazard:

Students are encouraged to report hazardous conditions or safety concerns to their educator, the administrative staff, and the academy director.

The local news media may be utilized to disseminate emergency information to members of the larger community, including neighbors, parents and other interested parties. Individuals who are members of the larger community and interested in receiving information pertaining to emergencies on campus may also access that information by visiting school website.

Academy staff responsible for carrying out the Emergency response and evacuation procedures is Denise Mitchell (Director) – Tuana European Beauty Academy - 970-472-2004

EMERGENCY EVACUATION PLAN

The emergency evacuation procedures are tested at least annually each year. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation.

There are two exits in the building, the front door is located at the north end of the building and exits to 18th street. The second exit is located at the south end of the building and exits into to the ally. Please refer to diagram at end of this handbook.

In the event of evacuation please proceed to the nearest exit available. Students performing services, please escort your client with you to the nearest exit.

Students, clients and staff are to meet in the parking lot across the street on 18th street.

Students and clients must stay in this area in order that staff may take attendance.

No one may enter the building until the staff gives approval.

No smoking in the event of an evacuation, this is NOT a break.

No one leaves the site until dismissed.

Listed below are the procedures to be followed in an emergency:

- a. Fire - staff and students are to call "911" and evacuate premises
- b. Medical - staff and students are to call "911" for assistance
- c. Criminal - staff and students are to call "911" when safe to do so
- d. Tornado or earthquake - staff and students should remain in the building and go to secure areas.

FIRE EXTINGUISHERS

Fire extinguishers are located throughout the building and clearly marked.

To operate fire extinguisher if necessary, do the following:

- 1) Pull the pin
- 2) Aim the nozzle at bottom of the fire
- 3) Squeeze the handle
- 4) Sweep from side to side at base of fire

FIRST AID

- First aid supplies are located in the dispensary

TIMELY WARNINGS

Reporting and notification:

Anyone with information warranting a timely warning should immediately report to Campus authority or staff member. Shortly after the incident is reported a decision regarding the issuance of a Timely Warning will be made on a case-by-case basis considering all the facts of the situation. The timing of the notification shall be based on the seriousness of the crime in relation to possible risk of compromising law enforcement efforts and the continuing threat to the students, employees, and guests of Tuana

European Beauty Academy. Information included in the warnings may include, but are not limited to, the following information:

- Type of crime
- Location
- Date and time occurred
- Any suspect information

Procedure:

The following methods may be used to disseminate information to the campus community about crimes that represent a continuing threat to students and employees:

- Text message—issued campus-wide
- Flyers—posted in visible areas, such as entry doorways.

BUILDING SECURITY AND ACCESS POLICY

Tuana European Beauty Academy, LLC does not have any campus residences or dormitories on location. Tuana European Beauty Academy, LLC does not maintain any off-campus locations of student organizations. During regular business hours, the school will be open to students, staff and clients. All visitors and clients must check in at the front desk. During non-business hours, the building will be under lock and key, only staff will be permitted in the building and the doors will remain locked. Students and the public will not be permitted in the building during non-business hours without direct permission of the Academy Director.

SECURITY AWARENESS AND PREVENTION OF CRIMINAL ACTIVITY

Tuana European Beauty Academy, LLC is committed to providing a safe and secure environment for all students, visitors and staff. The Academy seeks to improve the security of its campuses and the members of its campus communities by periodically presenting educational programs to inform students and staff about campus security procedures and practices, to encourage students and staff to be responsible for their own security and the security of others and to inform them about the prevention of crimes. The Academy regularly schedules guest speakers and offers classes on personal safety and self-defense.

PREVENTING DATING VIOLENCE, DOMESTIC VIOLENCE, SEXUAL ASSAULT, AND STALKING

Tuana Academy is committed to providing a safe learning and working environment. The school prohibits dating violence, domestic violence, sexual assault, and stalking and reaffirms its commitment to equal opportunity in educational programs, employment, and access to institutional programs and activities. Students, staff, administrators, and school are entitled to an educational and working environment free from these behaviors. If you are a victim of a sexual assault, your priority should be to get to a place of safety. You should then obtain necessary medical treatment. Time is a critical factor for evidence collection and preservation. An assault should be reported directly to a Campus authority or staff member.

Filing a report will:

- ensure that a victim of sexual assault receives the necessary medical treatment and tests, at no expense to the victim.
- provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam).
- assure the victim has access to free confidential counseling from counselors specifically trained in sexual assault crisis intervention. The Academy strongly advocates that a victim of sexual assault reports the incident in a timely manner to the local police. Time is a critical factor for evidence collection and preservation. The campus personnel will assist the victim in contacting the local police, although the victim also has the option to decline to make such notification. Once a complaint of sexual violence (including sexual assault), domestic violence, dating violence, or stalking is made, the complainant has several options such as, but not limited to:
 - contacting parents or a relative
 - seeking legal advice
 - seeking personal counseling (always recommended)
 - pursuing legal action against the perpetrator
 - pursuing disciplinary action
 - requesting that no further action be taken

Tuana Academy will provide written notification to victims about options for, and available assistance in, changing academic, transportation, and working situations. If victims request these accommodations and they are reasonably available they will be provided, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Standard of Evidence For all Formal Complaints of Sexual Harassment (including where employees are Respondents), the Academy utilizes the “preponderance of the evidence” standard.

P) The Academy ensures that its Title IX personnel have adequate Title IX training, including annual training on issues related to Sexual Assault, Dating Violence, Domestic Violence and Stalking. The Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of the Academy’s education Program or Activity, how to conduct an investigation, the Academy’s Grievance Process (including Live Hearings, appeals, and Informal Resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Decision-Makers are trained on the definition of Sexual Harassment, the Live Hearing process, and technology to be used in Live Hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal Resolution facilitators are trained on the Informal Resolution process.

Retaliation against any individual who reports sexual harassment, sexual assault, domestic violence, dating violence, stalking, or participates in an investigation or disciplinary process is strictly prohibited. Any act of retaliation, intimidation, threats, coercion, or discrimination against a person for reporting or participating in a complaint process will be subject to disciplinary action.

PREVENTION AND EDUCATION

In accordance with the Clery Act and VAWA, the Academy offers a range of campaigns, strategies, and initiatives to promote awareness, education, risk reduction, and prevention in an effort to reduce the frequency of sex or gender-based discrimination, harassment, and violence amongst members of the campus community.

The Academy offers programming to identify and prevent Sexual Assault, Dating Violence, Domestic Violence (including stranger and known offender assaults), and Stalking each year. Educational programs are offered to raise awareness for all incoming students and employees and are often conducted during new student and new employee orientation.

Programs and other campaigns offered throughout the year to students and employees include information regarding awareness and primary prevention (including normative messaging, environmental management, and bystander intervention), and discuss the Academy's policies. Programs also offer information on risk reduction that strives to empower individuals who experience these incidents, how to recognize warning signs, and how to avoid potential attacks, and do so without biased approaches.

Bystander engagement is encouraged through safe and positive intervention techniques and by empowering third-party intervention and prevention such as calling for help, using intervention-based apps, identifying allies, and/or creating distractions. Bystander empowerment training highlights the need for those who intervene to ensure their own safety in the intervention techniques they choose and motivates them to intervene as stakeholders in the safety of the Academy community when others might choose to be bystanders.

CONFIDENTIALITY

In order to make informed choices, it is important to be aware of confidentiality and reporting requirements when consulting academy resources. Any Team Member may report to the Title IX Coordinator. Education Team and Team Leads must report to the Title IX Coordinators and are considered mandatory reporters. Academy employee's designated mandatory reporters will notify the Title IX Coordinator of any complaints received.

An individual who seeks completely confidential assistance may do so by speaking with professionals who have legally protected confidentiality. The Academy does not have confidential reporting resources, such as pastoral or professional counselors on campus. Crisis, mental health and victim resource hotline information is available at the conclusion of this policy. Information shared with confidential resources will not be shared with the Academy (including the Title IX Coordinator) or anyone else without express, written permission of the individual seeking services unless required by law or court order.

The Academy will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Title IX Grievance Process.

VICTIM SERVICES

Victims will be provided written notification about off-campus counseling, health, mental health, victim advocacy, legal assistance, and other services available to them local community. Those services include:

Colorado Organization for Victim Assistance

www.coloradocrimevictoms.org

Alternatives to Violence, INC

www.alternativestoviolence.org

Crisis Number: 970-880-1000

Fort Collins Police Services

970-419-FCPD (3273)

A Woman's Place, INC

www.awpdv.org

970-356-4226

CAMPUS DISCIPLINARY ACTIONS

A victim of a sexual offense by a student or staff member may choose to report the alleged perpetrator to the Academy Director.

THE ACCUSER WILL BE:

- treated with consideration and understanding;
- encouraged to report the incident to appropriate local law enforcement authorities, and to seek appropriate legal redress;
- informed of the option to be assisted by campus authorities in notifying law enforcement authorities;
- given a list of off-campus sex offense victim services (medical, legal, ecclesiastical, educational and mental health), and encouraged to utilize these resources;
- informed of reasonable options and assistance in changing academic arrangements;
- informed that he/she must identify the accused and provide sufficient details of the event in writing for the Academy to investigate and, if justified, sanction the accused;
- informed that a person of his/her choice may accompany them, for the purpose of providing support, to any resulting campus disciplinary proceeding;
- informed that he/she will be promptly informed as to the outcome of the disciplinary proceeding;

Tuana European Beauty Academy, LLC Annual Security Report 7

- informed that the Academy will act responsibly to respect his/her privacy;
- informed that the Academy will initiate reasonable measures to assist in his/her safety.

THE ACCUSED

- informed of the nature of the allegations and asked to participate in an investigative interview.
- treated with consideration;
- allowed to respond in writing as to the allegation;
- cautioned to have no contact with the accuser during this process;
- informed that he/she will be promptly informed as to the outcome of the disciplinary proceeding

A timely determination will be made as to an appropriate sanction based upon all information gathered during the investigation. The range of appropriate sanctions may vary according to the facts. If the administrative personnel determine that it is more probable than not that the sex offense as alleged by the accuser did take place, appropriate sanctions will be imposed. If the accuser or accused elect to appeal the decision and/or sanction, the matter will then be heard by the Academy Director. If it is not feasible for the Director to come to a decision with respect to the allegation and the accuser pursues legal redress through the criminal or civil courts, the determination may be deferred pending the outcome of the legal process. Depending upon the court action, the Director may impose an appropriate sanction retroactive to the date of the sexual offense. Sanctions include, but are not limited to, no-contact order, suspension, probation or termination from the program. The Academy will act responsibly to protect the welfare and privacy of the accused with respect to the disciplinary process.

Tuana Academy disciplinary process includes a prompt, fair, and impartial initial investigation and final resolution process. In all instances, the process will be conducted in a manner that is consistent with the institution's policy and that is transparent to the accuser and the accused.

The accuser and the accused will have the same opportunities to have others present during any institutional disciplinary proceeding. The accuser and the accused each have the opportunity to be advised by an advisor of their choice at any stage of the process and to be accompanied by that advisor to any related meeting or proceeding. The Academy will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding. However, the role of the advisor is limited to observing and consulting with and providing support to the Complainant or Respondent. An Advisor may not participate (speak) in the investigation and hearing processes on the Student's/Complainant's behalf. The advisor should also maintain confidentiality

The accuser and the accused will be notified simultaneously, in writing, of the any initial, interim and final decision of any disciplinary proceeding.

RESTRAINING ORDERS

Any student or staff member who has a restraining order, order of protection, no contact order or any other such order issued by a court against another individual (whether or not that individual is also a student or staff member) is encouraged to notify an Academy Director of the threat and to provide a copy of the restraining order so that it can be enforced, if necessary.

Sex offense prevention sessions are presented to all new students in orientation.

Additional information is attached to this Security Report distributed to all students and employees annually.

SEX OFFENDER REGISTRATION PROGRAM

In accordance with the federal Campus Sex Crimes Prevention Act (CSCPA), notice must be given of registered sex offenders to institutions of higher education if the offender is employed, carries on a vocation, or is a student at the institution. Information regarding registered sex offenders residing within a specific geographic location can be accessed via:

Colorado Sex Offenders Registry: <https://apps.colorado.gov/apps/dps/sor/>

CRIME DEFINITIONS

The definitions of these offenses follow FBI guidelines and are as follows:

- *Murder and non-negligent manslaughter*: The willful (non-negligent) killing of one human being by another.
- *Negligent manslaughter*: The killing of another person through gross negligence.
- *Sexual Assault*: Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent.
- *Sex offenses*—non-forcible: unlawful, non-forcible sexual intercourse (i.e. incest or statutory rape).
- *Rape*: Penetration, no matter how slight, of the vagina or anus with a body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- *Statutory Rape*: Non-forcible sexual intercourse with a person who is under the statutory age of consent
- *Fondling*: The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will; or, not forcibly or against that person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental incapacity
- *Incest*: The non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- *Robbery*: The taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.
- *Aggravated assault*: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury, usually accompanied by the use of a weapon or by a means likely to produce death or great bodily harm.

- **Burglary**: The unlawful entry of a structure to commit a felony or a theft.
- **Motor vehicle theft**: The theft or attempted theft of a motor vehicle.
- **Arson**: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
- **Domestic violence**: Includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of a victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse or the victim under the domestic or family violence laws of the jurisdiction, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Tuana European Beauty Academy, LLC Annual Security Report 9

- **Dating violence**:

Violence committed by a person:

- who is or has been in a social relationship of a romantic or intimate nature with the victim where the existence of such a relationship shall be determined based on consideration of the following factors:
 - the length of the relationship
 - the type of relationship
 - the frequency of interaction between the persons involved in the relationship.
- **Stalking**: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - a) fear for his or her safety or the safety of others.
 - b) suffer substantial emotional distress.
- **Hate Crimes**: Any of the aforementioned offenses, and any other crime involving bodily injury, larceny-theft, simple assault, intimidation, and destruction, damage, or vandalism of property that manifests evidence that the victim was intentionally selected because of the actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability of the victim.
- **Illegal Weapons Possession**: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature. Included in this classification are: the manufacture, sale, or possession of deadly weapons; carrying deadly weapons—concealed or openly; the manufacture, sale, etc. of silencers; furnishing deadly weapons to minors; aliens possessing deadly weapons; and attempts to commit any of the above.
- **Drug Law Violations**: The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance; and arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

- Liquor Law Violations: The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages—not including driving under the influence and public drunkenness.

Included in this classification is: the manufacture, sale, transporting, furnishing, possessing, etc., of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; underage possession, using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and attempts to commit any of the above.

- Consent: In relation to sexual activity, as follows: Consent shall be defined to mean positive cooperation in act or attitude pursuant to an exercise of free will. The person must act freely and voluntarily and have knowledge of the nature of the act or transaction involved.

MONITORING OFF CAMPUS LOCATIONS OF RECOGNIZED STUDENT ORGANIZATIONS

The school monitors and records, through local police agencies, any criminal activity in which students have engaged at off-campus locations of student organizations officially recognized by the school, including student organizations with off-campus housing facilities.

CRIME STATISTICS

The Clery Act requires institutions of higher education to disclose crime statistics covering the previous three years.

Violation	2022		2023		2024	
	Academy Campus	Non Campus and Public Property	Academy Campus	Non Campus and Public Property	Academy Campus	Non Campus and Public Property
Criminal Offenses						
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Sexual Assault, including:						
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
VAWA Offenses						
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
Liquor, Drug & Weapon Violations						
Liquor Law Violations: Arrests	0	0	0	0	0	0
Liquor Law Violations: Disciplinary Referral	0	0	0	0	0	0
Drug Law Violations: Arrests	0	0	0	0	0	0
Drug Law Violations: Disciplinary Referrals	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc.: Arrests	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc.: Disciplinary Referral	0	0	0	0	0	0
Hate Crimes						
Race	0	0	0	0	0	0
Gender	0	0	0	0	0	0
Gender Identity	0	0	0	0	0	0
Religion	0	0	0	0	0	0
Sexual Orientation	0	0	0	0	0	0
Ethnicity	0	0	0	0	0	0
National Origin	0	0	0	0	0	0
Disability	0	0	0	0	0	0

EMERGENCY RESPONSE PLAN

WEAPONS

- Someone brings a weapon into the Academy, there are many levels of danger this can bring. Please use your best judgment when dealing with such a dangerous subject. If at any time you feel threatened in any way, please call 911. Tuana Academy strongly feels the police are there to protect and serve, therefore, they will not get upset if we call them.
 - IMMEDIATELY GET YOUR EDUCATOR

FIRE

- CALL TO YOUR EDUCATOR
- Fires can spread quickly-Safety first-call 911 execute emergency evacuation procedures
- If you feel comfortable go to the fire extinguisher and execute proper fire extinguisher procedures to extinguish fire.

PHYSICAL THREATS

- Homeless-never approach someone if you feel they could be a danger, notify your educator if you see any suspicious or concerning actions.
- Safety hazards-use caution during times of remodel/repairing/upgrading-debris can be on the floor and cause slipping and tripping hazard, please avoid these areas.
- General dangers-if at any time you see something that could cause harm to the building, students, or staff members please notify your educator immediately.

ADDITIONAL RESOURCES

National Sexual Violence Resource Center

Contact Information: 877-739-3895

Rape, Abuse and Incest National Network (RAINN)

Contact Information: 800-656-4673

National Sexual Assault Hotline

Contact information: 1800-656-4673

*Counseling, advocacy and support for victims, regardless of whether or not a victim chooses to make an official report or participate in the Institutional disciplinary or criminal process. Option to disclose with confidentiality. Counselors can provide ongoing support during the institutional disciplinary or criminal process.

Sexual Assault Response Team (SART)

Contact information: 877-739-3895

*Helps victims navigate medical, emotional and legal issues along with associated procedures. SART is available for quick reference and immediate assistance. SART will help victim find options to seek treatment for injuries, preventative treatment for sexually transmitted diseases and other health services.

Law Enforcement

Contact Information: dial 911

Sexual Assault Nurse Examiner (SANE)

Forensicnurses.org

*Offers assistance in obtaining a rape kit and preservation



Tuana European Beauty Academy, LLC

Drug Free Workplace Policy



DRUG FREE WORKPLACE POLICY

INTRODUCTION

The following Drug-Free Workplace Policy is to notify all employees and students that pursuant to the Federal Drug-Free Workplace Act of 1988 (Public Law 101-690), prohibits the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace, on school property, or as part of any school activity. Similarly prohibits the unlawful use, possession, and distribution of alcohol in the workplace, on school property, or as part of any school activity, as well as any other unlawful conduct involving alcohol.

The drug-free workplace consists of all locations where business does. This includes, but is not limited to, all lecture classrooms, parking lots, all administrative offices, corridors, storage rooms, and any space added to the school or school property.

HEALTH RISKS

The abuse of narcotics, depressants, stimulants, hallucinogens, or alcohol can cause serious detriment to a person's health. The health risks associated with the misuse of the previously mentioned drugs vary, but may include, and are not limited to: convulsions, coma, paralysis, irreversible brain damage, tremors, fatigue, paranoia, insomnia, and possible death. Drug and alcohol abuse is extremely harmful to a person's health and interferes with productivity and alertness. Working while under the influence of drugs or alcohol could be a danger to the individual under the influence, coworkers, and students. Described below are additional dangers and symptoms relative to use and/or abuse.

CANNABIS

Commonly known as marijuana, marijuana is a plant with the botanical name of *cannabis sativa*. Marijuana is almost always smoked but can be ingested. Use causes the central nervous system to become disorganized and confused. Most users experience an increase in heart rate, reddening of eyes, and dryness of the throat and mouth. Studies have proven that marijuana's mental effects include temporary impairment of short-term memory and an altered sense of time. It also reduces the ability to perform tasks requiring concentration, swift reactions, and coordination. Feelings of euphoria, relaxation, and bouts of exaggerated laughter are also commonly reported. Smoking marijuana may cause: brain chemical changes, an altered reality, physically damaged lungs, emphysema, chronic bronchitis, lung cancer, a weakened immune system, damage to sperm in males, irregular menstrual cycles in females, and reduced fertility and sex drive.

Regardless whether or not the state allows the use of marijuana or medical marijuana, at the federal level, marijuana remains classified as a Schedule I substance under the Controlled Substances Act, in which Schedule I substances are considered to have a high potential for dependency and no accepted medical use, making distribution or use of marijuana a federal offense. Therefore, regardless of the circumstance, marijuana cannot be brought to or used on the school's campus.

COCAINE/CRACK

Cocaine is a stimulant drug, which is derived from the coca plant. Street cocaine is available in the form of a powder or a “rock” of crack and is most commonly inhaled or smoked. Cocaine increases the heart rate and blood pressure and is highly addictive.

Crack is a form of smokable cocaine named for the popping sound it makes when burned. It is a mixture of cocaine, baking soda, and water. It is 5–10 times more potent than cocaine and is extremely harmful. It has been reported that addiction can occur with as few as two “hits.”

Some symptoms of cocaine/crack abuse are: personality changes; unexplained weight loss; excess sniffing and coughing; insomnia; depression; irritability; neglect of responsibility toward work, school, family, and friends; and panic attacks.

ALCOHOL

In small amounts, alcohol has a tranquilizing effect on most people, although it appears to stimulate others. Alcohol first acts on those parts of the brain that affect self-control and other learned behaviors; lowered self-control can lead to aggressive behavior. Alcohol use can also cause dehydration, coordination problems, and blurred vision.

In large amounts, alcohol can dull sensation and impair muscular coordination, memory, and judgment. Taken in larger amounts over a long period of time, alcohol can damage the liver, heart, and brain, and cause numerous other health and medical issues.

HALLUCINOGENS

Hallucinogens are also known as psychedelics. The effects vary; a user’s reactions can vary by occasion. Most users are affected by changes in time and space perception, delusions, and hallucinations. The effects may be mild or overwhelming, depending on the dose and quantity of the drug. Physical reactions range from minor changes, such as dilated pupils or an increase in temperature and heartbeat, to major changes, such as tumors. High doses can significantly alter the state of consciousness. After taking a hallucinogenic drug, the user loses control of thought processes. Although many perceptions are benign, others may cause panic or may make the user believe he or she cannot be harmed. Such delusions can be dangerous.

HEROIN

Heroin is a narcotic, which relieves pain and induces sleep. Commonly known as “junk” or “smack,” heroin is a highly addictive depressant and has been attributed as the cause of many deaths. Symptoms include “pin-point pupils”; drowsiness, lethargy, and slurred speech; and an inability to concentrate. Related medications used to treat pain include oxycontin and oxycodone, methadone, and codeine. The abuse of painkillers ranks second only to the abuse of marijuana in the United States.

Heroin users experience a higher rate of infectious disease due to a weakened immune system and sharing contaminated needles. Children can be born addicted or can become addicted as a result of heroin in the mother's breast milk.

CRYSTAL METHAMPHETAMINE

Crystal methamphetamine is a colorless, odorless, powerful, and highly addictive synthetic (man-made) stimulant. Crystal methamphetamine typically resembles small fragments of glass or shiny blue-white “rocks” of various sizes. Like powdered methamphetamine, crystal methamphetamine produces long-

lasting euphoric effects. Crystal methamphetamine, however, typically has a higher purity level and may produce even longer-lasting and more intense physiological effects than the powdered form of the drug. Crystal methamphetamine use is associated with numerous serious physical problems. The drug can cause rapid heart rate, increased blood pressure, and damage to the small blood vessels in the brain, which can lead to stroke. Chronic use of the drug can result in inflammation of the heart lining. Overdoses can cause hyperthermia (elevated body temperature), convulsions, and death. Crystal methamphetamine users may experience episodes of violent behavior, paranoia, anxiety, confusion, and insomnia. The drug can produce psychotic symptoms that persist for months or years after an individual has stopped using the drug. Crystal methamphetamine users who inject the drug expose themselves to additional risks, including contracting HIV (human immunodeficiency virus). Methamphetamine users also risk scarred or collapsed veins, infections of the heart lining and valves, abscesses, pneumonia, tuberculosis, and liver or kidney disease.

DEPRESSANTS

Depressants are highly addictive; they are usually known as “downers.” A user may be drowsy and lethargic, suffer from memory loss, and have slurred speech. Many lawful drugs that have characteristics of depressants are from the family of drugs called barbiturates. More serious effects of the abuse of downers are liver damage, paradoxical anxiety and excited rage, coma, and death.

ECSTASY (MDMA)

Also known as XTC, X, and E, Ecstasy is a mind-altering drug with hallucinogenic and speed-like side effects. Often used at raves, it is taken to promote loss of inhibition, excitability, euphoria, energy, and sexual stimulation. Ecstasy increases the amounts of serotonin in the user’s brain, which causes increased energy and euphoria; it also contains anti-coagulative properties, which can cause the user to bleed to death if injured. Ecstasy can also cause serious brain damage in a short time. Side effects of ecstasy include: depression, increased heart rate and blood pressure, muscle tension, nausea, blurred vision, faintness, chills, brain damage, organ damage, and death. Similar “designer drugs” include MDEA and MDA (also known as “Adam” and “Eve”).

RITALIN

Methylphenidate (Ritalin) is a medication prescribed for individuals (usually children) who have an abnormally high level of activity or attention-deficit hyperactivity disorder (ADHD). It contains amphetamines and can be abused as a stimulant by those for whom it is not prescribed. When abused, the tablets are either taken orally or crushed and snorted. Some abusers dissolve the tablets in water and inject the mixture — complications can arise from injection as insoluble fillers in the tablets can block small blood vessels.

GHB

Gamma-hydroxybutyrate is an intoxicating chemical with medical, recreational, and potentially dangerous uses. Its use is illegal for any purpose in the United States. Nicknamed the “date rape drug,” it is a clear liquid often mixed in drinks to promote relaxation or increased sociability. When taken, side effects can include: drowsiness, dizziness, vomiting, amnesia, decreased motor skills, slurring of speech, unarguable sleep (coma), and death. GHB was used as a dietary supplement until banned by the FDA. GHB is now illegal in the United States. Common slang names for GHB are: G, Liquid X, GBH, Gamma-oh, Blue Verve, Grievous Bodily Harm, Goop, and EZLay.

Drug Conviction Notification and Imposed Sanctions:

- Any employee or student must notify of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such a conviction.
- Within 30 days after receiving notice of an employee or student conviction, will impose corrective measures on the employee or student convicted of drug abuse violations in the workplace by:
 - Taking appropriate action against the employee or student up to and including expulsion or termination of employment and referral for prosecution and/or
 - Requiring such employee or student to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency.

LAWS RELATING TO DRUG VIOLATIONS

Attached (page 45) is a list of violation codes associated with the unlawful manufacture, distribution, dispensing, possession, or use of any controlled substance. Any employee or student violating any of the described laws of the Health and Safety Code or the Business and Professional Code could be subject to fines and imprisonment.

Where can students go for help? Where can staff go for help?

Drug Abuse and Addiction Information and Treatment Centers

The Recovery Village -877-850-6231

Aspen Ridge Recovery -866-850-7550

Alcohol Anonymous -Northern Colorado Intergroup, INC www.northcoloradoaa.org - 970-224-3552

Substance Abuse Treatment Referral Service -1(800)662-4889

Al-Anon & Alateen 1(888)425-2666

Alcoholics Anonymous (602)264-1341

POLICY DISTRIBUTION PROCEDURES

Drug-Free Workplace Policy will be distributed to all employees and students on an annual basis using the following procedure:

- Students will receive a copy of the Drug-Free Workplace Policy at the time of initial enrollment. The enrollment agreement signed by every student will acknowledge receipt of the Drug-Free Workplace Policy.
- Staff employees will receive a copy of the Drug-Free Workplace Policy with the initial employment agreement.

It will be read, and the signature page will be returned with the employment agreement. Annually, the human resources department will be responsible for distributing the policy to current staff employees. Biennial Review. The school conducts a biennial review of its Drug-Free Workplace Policy to determine the program's effectiveness; any needed changes, the number of drug- and alcohol-related violations and fatalities, and the number and type of sanctions imposed. Contact the School Director to request a copy of the biennial review.

DRUG SCHEDULES AND PENALTIES

Federal Trafficking Penalties*

Drug/Schedule	Quantity	Penalties	Quantity	Penalties
Cocaine (Schedule II)	500–4,999 grams mixture	<p>First offense: Not less than five years, and not more than 40 years. If death or serious injury, not less than 20 years or more than life imprisonment. Fine of not more than \$2 million if an individual, \$5 million if not an individual.</p> <p>Second offense: Not less than 10 years, and not more than life imprisonment. If death or serious injury, life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.</p>	5 kilograms or more mixture	<p>First offense: Not less than 10 years, and not more than life imprisonment. If death or serious injury, not less than 20 years or more than life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.</p> <p>Second offense: Not less than 20 years, and not more than life imprisonment. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$20 million if not an individual.</p> <p>Two or more prior offenses: Life imprisonment</p>
Cocaine Base (Schedule II)	28–278 grams mixture		279 grams or more mixture	
Fentanyl (Schedule II)	40–399 grams mixture		400 grams or more mixture	
Fentanyl Analogue (Schedule I)	10–99 grams mixture		100 grams or more mixture	
Heroin (Schedule I)	100–999 grams mixture		1 kilogram or more mixture	
LSD (Schedule I)	1–9 grams mixture		10 grams or more mixture	
Methamphetamine (Schedule II)	5–49 grams pure or 50–499 grams mixture		50 grams or more pure or 500 grams or more mixture	
PCP (Schedule II)	10–99 grams pure or 100–999 grams mixture		100 grams or more pure or 1 kilogram or more mixture	
Penalties				
Other Schedule I and II Drugs (and any drug product containing Gamma Hydroxybutyric Acid)	Any amount	<p>First offense: Not more than 20 years. If death or serious injury, not less than 20 years, or more than life imprisonment. Fine \$1 million if an individual, \$5 million if not an individual.</p> <p>Second offense: Not more than 30 years. If death or serious injury, not less than life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	1 gram or more			
Other Schedule III Drugs	Any amount	<p>First offense: Not more than five years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	30 to 999 milligrams	<p>Second offense: Not more than 10 years. Fine not more than \$500,000 if an individual, \$2 million if not an individual.</p>		
All Other Schedule IV Drugs	Any amount	<p>First offense: Not more than three years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	Less than 30 milligrams	<p>Second offense: Not more than six years. Fine not more than \$500,000 if an individual, \$2 million if not an individual.</p>		
All Schedule V Drugs	Any amount	<p>First offense: Not more than one year. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.</p> <p>Second offense: Not more than two years. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.</p>		

Federal Trafficking Penalties — Marijuana*

Drug	Quantity	First Offense	Second Offense
Marijuana	1,000 kilograms or more mixture; or 1,000 or more plants	<ul style="list-style-type: none"> • Not less than 10 years, not more than life imprisonment. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine not more than \$4 million if an individual, \$10 million if other than an individual. 	<ul style="list-style-type: none"> • Not less than 20 years, not more than life imprisonment. • If death or serious injury, mandatory life imprisonment. • Fine not more than \$8 million if an individual, \$20 million if other than an individual.
Marijuana	100 kilograms to 999 kilograms mixture; or 100 to 999 plants	<ul style="list-style-type: none"> • Not less than five years, not more than 40 years. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine not more than \$2 million if an individual, \$5 million if other than an individual. 	<ul style="list-style-type: none"> • Not less than 10 years, not more than life imprisonment. • If death or serious injury, mandatory life imprisonment. • Fine not more than \$4 million if an individual, \$10 million if other than an individual.
Marijuana	more than 10 kilograms hashish; 50 to 99 kilogram mixture more than 1 kilogram of hashish oil; 50 to 99 plants	<ul style="list-style-type: none"> • Not more than 20 years. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine \$1 million if an individual, \$5 million if other than an individual. 	<ul style="list-style-type: none"> • Not more than 30 years. • If death or serious injury, mandatory life imprisonment. • Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana	1 to 49 plants; less than 50 kilogram mixture	<ul style="list-style-type: none"> • Not more than five years. • Fine not more than \$250,000, \$1 million if other than an individual. 	<ul style="list-style-type: none"> • Not more than 10 years. • Fine \$500,000 if an individual, \$2 million if other than an individual.
Hashish	10 kilograms or less		
Hashish Oil	1 kilogram or less		

*From the U.S. Drug Enforcement Administration

STUDENT LOAN CODE OF CONDUCT

To comply with the 2008 Higher Education Opportunity Act, enacted August 14, 2008, Tuana European Beauty Academy adopts the following Student Loan Code of Conduct to serve as the guiding principles in ensuring the integrity of the student financial aid process. All Tuana Academy employees who have responsibilities with respect to educational loans are required to comply with this Student Loan Code of Conduct.

Neither Tuana Academy as an institution nor any individual employee shall enter into any revenue-sharing arrangements with any lender. For the purposes of this document, revenue-sharing is defined to mean any arrangement between an institution and a lender making Title IV loans wherein the institution recommends the lender or the loan products, and in exchange, the lender pays a fee or provides a service to the institution or its employees.

An employee who has responsibilities with respect to education loans, or any of their family members, shall not solicit or accept any gift from a lender, guarantor, or servicer of education loans. For purposes of this prohibition, the term "gift" means any gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a trivial amount. The term includes a gift of services, transportation, lodging or meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

An employee who has responsibilities with respect to education loans shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.

Tuana Academy shall not, through award packaging or other methods, assign a first-time borrower's loan to a particular lender or refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

Tuana Academy shall not request or accept from any lender any offer of funds to be used for private education loans, including funds for an opportunity pool loan, in exchange for the institution providing concessions or promises to a lender regarding a specified number of loans made, insured, or guaranteed; a specified volume of loans; or a preferred lender arrangement for such loans. An opportunity pool is defined as a private education loan made by a lender to a student (or the student's family) that involves payment by the institution to the lender for extending credit to the student.

Tuana Academy shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing unless those services are short-term and nonrecurring, in the event of an emergency or disaster or for office staff professional development. Those services may include providing counseling, financial literacy, or debt management materials to borrowers as long as such materials

disclose to borrowers the name of the lender that provided or assisted in the preparation of the materials.

Any employee who has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.