

FINAL INVESTIGATIVE REPORT
UNIVERSITY OF MASSACHUSETTS AT AMHERST:
ALEX MORSE MATTER

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TABLE OF CONTENTS

I.	Introduction	1
II.	Scope of Investigation	3
	A. Document Review	3
	B. Witness Interviews	3
III.	Factual Summary	5
	A. Morse’s Relationship with UMass and College Democrats	5
	B. The October 5, 2019 College Democrats Western MA Kickoff and Its Aftermath	8
	C. UMass Democrats Board Members’ Growing Concerns About Morse	12
	D. UMass Democrats’ Internal Disagreements About Morse	16
	E. Events Leading to the UMass Democrats’ Decision to Publicly Disinvite Morse From Future Events	20
	F. Events Following the August 6, 2020 Letter to Morse	24
IV.	Applicable Policies & Guidelines	25
V.	Findings and Closing	25
	A. Alex Morse Frequently Communicated with University Students on Social Media in a Manner Reasonably Interpreted by Those Students and Others as Suggestive of His Intent to Pursue Dating or Sexual Relationships	25
	B. Alex Morse’s Pursuit of Dating or Sexual Relationships with University Students via Social Media did not Violate the University’s Policy on Consensual Relationships because Morse did not have Grading, Supervisory, Advisory or Employment Responsibility for the Students	26
	C. Alex Morse’s Pursuit of Dating or Sexual Relationships with University Students Made a Number of Students Uncomfortable and Led to the UMass Democrats’ Decision to Disinvite Him from Future Events but did not Unreasonably Interfere with any Student’s Academic Performance or Ability to Participate in University Programs or Activities under the University’s Sexual Harassment Policy	28

D.	Alex Morse’s Pursuit of Dating or Sexual Relationships with University Students May Be Inconsistent with the University’s Principles of Employee Conduct.....	30
VI.	List of Exhibits	30
VII.	List of Appendices.....	32

I. Introduction

The University of Massachusetts (“UMass” or “University”) engaged Saul Ewing Arnstein & Lehr, LLP (the “Investigators”) to investigate allegations of misconduct against Alex Morse (“Morse”), adjunct instructor of Urban Government and Politics in UMass’ College of Social and Behavioral Sciences (“SBS”).¹ UMass requested that the Investigators make a preliminary determination as to whether Morse’s conduct, as publicly alleged, violated applicable University policies.

On August 6, 2020, a group of student-led organizations comprised of the College Democrats of Massachusetts (“College Democrats”),² the UMass Democrats (“UMass Democrats”), and the Amherst College Democrats notified Morse, via email, that the group was disinviting Morse from future events based on its view that it was “no longer appropriate to encourage interaction” between its group members and Morse. *See Exhibit 1.*³ At the time, Morse, in addition to serving as the Mayor of Holyoke, Massachusetts, was a candidate for Representative of Massachusetts’ First Congressional District, a seat held by Congressman Richard Neal, another UMass adjunct faculty member.⁴ The College Democrats’ email raised three central allegations: (1) Morse regularly matched with its members and other students on dating apps such as Tinder and Grindr; (2) Morse used College Democrats events to meet college students and to later connect with them via social media in a manner that made the students uncomfortable; and (3) Morse had sexual contact with college students including UMass Amherst students.

Response to the College Democrats’ communication to Morse was swift. The letter’s timing, within weeks of the democratic primary in Morse’s congressional race, and its tenor, specifically its allegations of sexual misconduct against Morse, one of only a few openly gay elected officials in the state, led to accusations of political dirty tricks and homophobia. Leaders of the UMass Democrats faced intense scrutiny and backlash after text messages and group chats - in which they purportedly made light of Morse’s social media communications and openly discussed the potential political fallout of public exposure of those communications - were released to the media.⁵ Similarly, the Massachusetts State Democratic Committee (“DSC”), the state party’s

¹ Morse joined the UMass faculty in 2014.

² According to its website, the College Democrats of Massachusetts is the college outreach wing of the Massachusetts Democratic Party with chapters located at numerous schools throughout the state, including UMass and Amherst College. Students Witness One and Witness Two held board positions in both UMass Democrats and College Dems.

³ The following day, the email’s contents, but not the email itself, were reported in the UMass student newspaper, the *Daily Collegian*, and in the online publication, *Politico*.

⁴ College Democrats sent the email to Morse’s campaign email account and to his personal email address. It does not appear that the email was sent to Morse’s UMass email account.

⁵ The UMass Democrats later issued a statement to Morse, via email, apologizing for the “careless” language in the August 6, 2020 language and the unintended homophobic backlash it caused. *See Exhibit 2.* The students did not retract the letter’s central allegations.

governing body, commissioned an external independent review of its role in the release and publication of the College Democrats' letter to Morse.

In an August 9, 2020 public statement, Morse admitted to having had consensual relationships with local college students whom he met using dating apps but denied ever using his position of power as Mayor of Holyoke or as a UMass lecturer for romantic or sexual gain. *See Exhibit 3.*⁶ Morse apologized if students were made to feel uncomfortable by their interactions with him and pledged his full support and participation in the University's review process.

The Investigators reviewed the students' allegations to determine whether a preponderance of the evidence supports a finding that Morse violated University policies governing sexual harassment, misconduct, and consensual relationships between faculty and students. This report summarizes the investigation and, as further detailed below, concludes that, over the course of several years, Morse frequently communicated with University students on social media in a manner that was reasonably interpreted by those students and others as suggestive of his intent to pursue dating or sexual relationships with those students. The Investigators found that, in a number of instances, Morse's communications caused students to feel uncomfortable and that this conduct ultimately led to the UMass Democrats' decision to disinvite him from its events.

While the totality of Morse's conduct, including his admitted consensual relationships with students he met using dating apps, supports a finding that Morse intended to pursue dating and sexual relationships with UMass Democrats members and other students, the Investigators found that there is insufficient evidence of Morse having engaged in such conduct with students for whom he had grading, supervisory, advisory or employment responsibility as is required by the University's Policy on Consensual Relationships.⁷ Further, while the evidence supports a finding that a number of students, including those who Morse engaged with on social media, were made uncomfortable by Morse's conduct, there is insufficient evidence that Morse unreasonably interfered with any student's academic performance or with a student's ability to participate in University programs or activities as is required by the University's sexual harassment policy. Finally, the Investigators leave for the University's leadership to assess whether Morse's pursuit of dating or sexual relationships with students, while not violative of the text of existing policies, conflicts with the University's general expectations for the conduct of its employees, including

⁶ According to the final report of the DSC investigation (hereinafter "the Jacques Report"), Morse emailed a statement to the College Democrats shortly after receiving the letter, in which he expressed similar sentiments to those found in his August 9, 2020 public statement.

⁷ The Investigators did not assess whether Morse's conduct conflicts with the intent, while not the letter, of University policies designed to highlight the power imbalance between faculty members and students and to discourage, while not prohibiting outright, consensual personal relationships between faculty and students due to their "inherently problematic" nature. *See* University Policy on Consensual Relationships Between Faculty and Students, attached hereto as **Appendix A**.

those requiring employees to conduct themselves in a manner that accords respect to themselves and others.⁸

II. Scope of Investigation

A. Document Review

The Investigation included review of UMass records, media reports, emails, and social media messages and other materials including, but not limited to, the following:

- Class Rosters for Urban Government and Politics (2014-2019);⁹
- Student Evaluations for Urban Government and Politics (2015-2019);¹⁰
- UMass Democrats Membership List (2009-Present);
- UMass Democrats Board Email and Chat Communications Related to Allegations Against Morse;
- UMass student and faculty email communications related to allegations against Morse (October 2019-Present);¹¹
- GroupMe Chat Logs, Text Messages, and Social Media Communications of Interviewees; and
- Final Report of Independent Review of the Massachusetts Democratic State Committee (“DSC”)

B. Witness Interviews

The Investigators identified and contacted eleven (11) potential witnesses for interviews in this matter. Of these, three (3) individuals did not respond to interview requests or refused to be interviewed. In light of the current public health emergency, the remaining eight (8) witnesses were interviewed via videoconference. To protect the privacy of students who provided information to the Investigators or whose names appear in witness statements or other documents, the Investigators have assigned each student an unique identifier.

- Witness One – UMass/UMass Democrats student

⁸ See University Principles of Employee Conduct, attached hereto as **Appendix B**.

⁹ The Investigators note that, although we reviewed rosters dating back to 2014, UMass’s policy governing consensual relationships between students and faculty was not implemented until 2018.

¹⁰ The evaluations contained mostly positive, and otherwise neutral, statements and ratings from Morse’s students. None of the narrative responses mentioned inappropriate behavior from Morse.

¹¹ The University produced more than 6,000 emails and other documents from 19 total custodians including students and faculty members. Among the documents retrieved during this review are **Exhibit 1**, the College Democrats’ August 6, 2020 email to Morse; **Exhibit 4**, the College Democrats board’s August 7, 2020 email to its chapter presidents advising of the board’s decision to disinvite Morse from events; **Exhibit 5**, College Democrats’ invitation for Morse to attend its October 5, 2019 Western MA Kickoff; and multiple media inquiries to UMass students in the wake of the letter’s release.

- Witness Two – UMass/UMass Democrats student
- Witness Three – UMass/UMass Democrats student
- Witness Four – UMass/UMass Democrats alum
- Witness Five – UMass/UMass Democrats student
- Witness Six – UMass student
- Witness Seven – UMass/UMass Democrats student
- Witness Eight – UMass/UMass Democrats student
- Student A – UMass/UMass Democrats student – declined to be interviewed
- Student B – UMass/UMass Democrats alum – did not respond to interview requests
- Student C – Non-UMass/College Democrats student – declined to be interviewed

The Investigators invited Mayor Morse to participate in the investigation. Through his attorney, he declined the Investigators’ interview request.

Some witnesses were also interviewed as part of the DSC’s independent review. The Investigators reviewed the final report of that review (“the Jacques Report”) and where there is material conflict between a witness’s statement to the Investigators and a statement attributed to him/her in the Jacques Report, it is noted herein.

Student C, who served as a College Democrats board member during the 2019-2020 academic year, declined multiple requests for an interview in this matter but appears to have participated in the DSC independent review. Mayor Morse similarly declined the Investigators’ interview request, but also appears to have participated in the DSC review. Where the statements attributed to either Student C or Mayor Morse in the Jacques Report are relevant to this matter, they are included in this report and identified thusly.

Other students were named by interviewees or are identified in emails, text messages, or other documents. The Investigators did not attempt to interview these individuals.

- Student D – Non-UMass/College Democrats of America student
- Student E – UMass/UMass Democrats student
- Student F – UMass student
- Student G – Non-UMass/College Democrats student

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III. Factual Summary

The following summarizes the investigation based on witness interviews and document review.

A. Morse's Relationship with UMass and College Democrats

Alex Morse began serving as Mayor of Holyoke, MA in 2012 and joined the UMass adjunct faculty two years later. He appears to have been a years-long participant in College Democrats-sponsored events in Western Massachusetts.¹² By most accounts, Morse, one of the youngest elected officials in the state, was widely known in politically-active student circles and seen as an up-and-coming influential person in Massachusetts politics having recently been named one of Forbes Magazine's "30 Under 30."¹³ However, as far back as 2015, according to Witness Two, a UMass student, it was an open secret within UMass Democrats that Morse communicated with students on social media and matched with students on dating apps such as Tinder. Morse was also rumored to have had dating and sexual relationships with UMass students.¹⁴ Morse, himself, admits to having engaged in such relationships. *See Exhibit 3.*

As new students enrolled at UMass and joined UMass Democrats, they learned of Morse's reputation within UMass Democrats from upperclassmen and alumni who maintained contact with the group. In 2018, Witness Two saw Morse's profile on Tinder.¹⁵ The two were identified as a potential "match," meaning that they each fell within the other's list of match criteria (age, location and gender). Witness Two deduced that Morse's age preference was set low enough to capture the then-18 year-old Witness Two and that Morse's location criteria encompassed the UMass campus where Witness Two lived.

Although Morse did not "swipe back" indicating an interest in completing the match and never exchanged messages with Witness Two, Witness Two reported the potential Tinder match to Student B, a UMass Democrats upperclassman. According to Witness Two, Student B revealed that Morse was known to match with UMass students, some as young as 18 years old on Tinder

¹² It appears that Morse attended at least two College Democrats events in 2019. One media outlet pronounced College Democrats as a "potential organizational asset" to Morse. *See Exhibit 6* (reporting from the April 2019 College Dems annual convention and describing College Dems events as "familiar territory" for Morse).

¹³ The University announced Morse's Forbes Magazine feature on its website in 2018. *See* <https://polsci.umass.edu/news/mayor-alex-morse-named-30-under-30-forbes-magazine>.

¹⁴ According to the Jacques Report, Student C stated that it was "well-known among College Dems" that Morse "used his position as Mayor to hook up with his students." While the weight of the evidence supports the conclusion that Morse had earned a reputation for pursuing dating and sexual relationships with students, no witness stated or even intimated that Morse leveraged his position as Mayor to facilitate those relationships. It was only after the October 5, 2019 College Dems event that, according to witnesses in this matter, students began to express the view that Morse attended College Dems events in order to meet eligible college students.

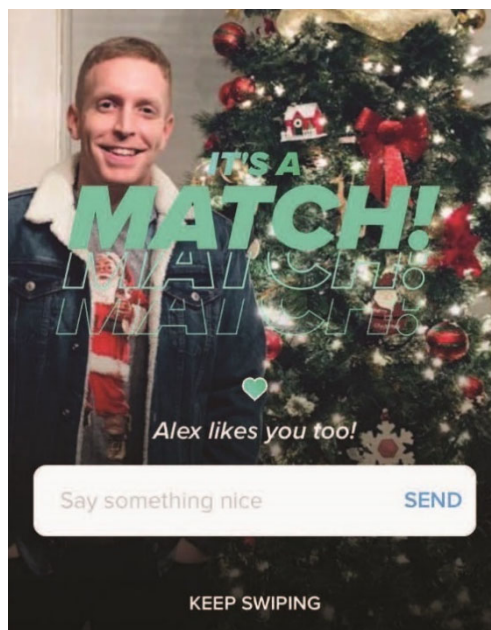
¹⁵ Witness Two reports that he sought to accumulate Tinder matches to win a contest for which the person with the most matches received tickets to an upcoming concert by rapper Cardi B.

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and other social media applications. Student B also revealed that he personally matched with Morse on Tinder while he was a student in Morse’s class or soon after the class ended.¹⁶

While no witnesses report having heard anyone express discomfort with Morse’s conduct prior to the fall of 2019, the general consensus among UMass Democrats students, past and present, was that, at the very least, Morse’s conduct was “weird,” in that his having engaged in dating and sexual relationships with University students was, according to witnesses, an open secret. Some students found Morse’s Tinder preferences especially troubling since Tinder was known to them as a “hook-up” app, meaning for individuals interested in sexual liaisons, rather than platonic interaction. Witness Four, an UMass Democrats alum, described Morse’s social media interactions with students as “widely known,” particularly amongst the University’s gay students. He reports that, during his time at UMass (2015-2018), he knew of two students who matched with Morse on Tinder. However, according to Witness Four, the communications between these students and Morse never escalated to in-person meetings or any sexual contact.¹⁷

In September of 2019, Witness Two’s fellow UMass Democrats board member, Witness One, also matched with Morse on Tinder.



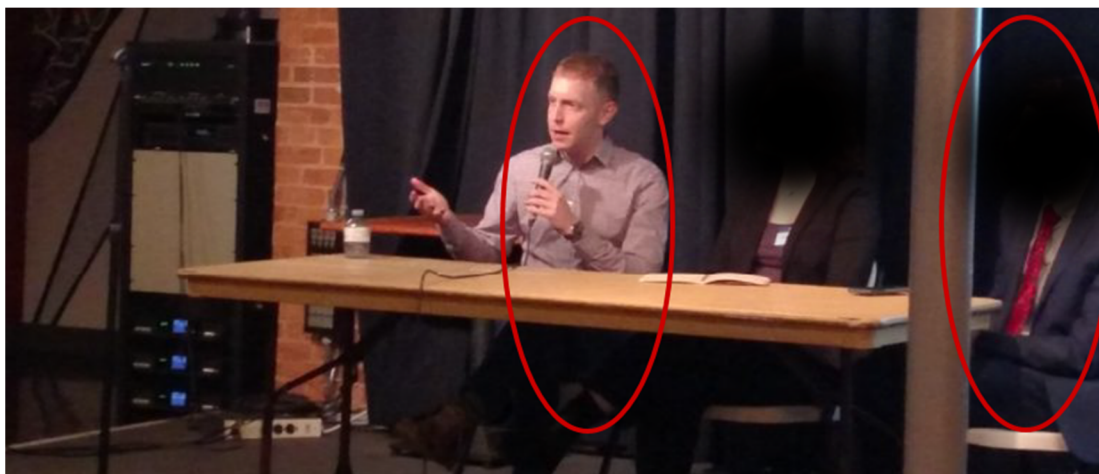
See Exhibit 7.

¹⁶ The Investigators confirmed, through review of Morse’s class rosters, that Student B registered for Morse’s class in a year that pre-dates implementation of the Consensual Relationships Policy.

¹⁷ Witness Four also reported that a third friend, who still attends UMass, reported having sexual contact with Morse in the summer of 2019. Witness Four declined to identify this student or the friends who reportedly matched with Morse on Tinder. He did not know whether any had taken Morse’s class.

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Witness One recognized Morse from having attended a College Democrats' event that past spring, during which the two participated jointly in a panel discussion. Witness One was surprised to see Morse on Tinder due to his role as a Mayor; at the same time, Morse's mayoral role "appealed" to Witness One and he decided to pursue a personal relationship. The two exchanged messages via Tinder, but did not arrange to meet in person. After the exchange of a couple of messages over a few days, Witness One sent Morse a photo from the event where they first met and asked of Morse, "now, do you remember me?"



See **Exhibit 6**.¹⁸

Morse replied "yes," and promptly un-matched with Witness One.

Soon after beginning his Tinder messaging with Morse, Witness One discussed the match with friends from both College Democrats and UMass Democrats. According to Witness One, some of his friends were surprised that Morse was on Tinder while others reported that they had heard from friends who had similar experiences with Morse on the app. At least two members of the group, Students A and C voiced their discomfort, specifically because of the age difference between Witness One and Morse.¹⁹ Witness One did not share his friends' discomfort initially, but he now reports that he became discomfited by the fact that his attraction to Morse stemmed from the "allure" of Morse's role as a Mayor, which Witness One considered a position of power.

¹⁸ Based on the time frame and Witness One's description of the event, the Investigators were able to identify the event and the photograph of Witness One and Morse.

¹⁹ Morse's profile indicated that he was then 30 years old. Witness One was 19 years old at the time.

B. The October 5, 2019 College Democrats Western MA Kickoff and Its Aftermath

In July 2019, Morse announced his candidacy for Representative of Massachusetts' 1st Congressional District.²⁰ His opponent was incumbent Congressman Richard Neal, who, like Morse, held an adjunct faculty position at UMass. By the fall of 2019, UMass Democrats and other politically active student groups began hosting and facilitating programming for candidates in several local, state, and national races. When asked if Morse's social media activity and rumored pursuit of dating and sexual relationships with students was considered in determining whether to engage with him and his campaign, Witness Two, a UMass Democrats and College Democrats board member, stated that it was not discussed. To that end, in mid-September 2019, Witness Two e-mailed Morse to inquire about the availability of positions within Morse's congressional campaign for UMass Democrats members. *See Exhibit 8.* Later that fall, however, things began to change. Specifically, in the aftermath of the College Democrats' Western Massachusetts kick-off at Holyoke Community College, when Morse followed and messaged at least four (4) UMass Democrats/College Democrats members within days of the event,²¹ the group's discussion of Morse's overtures to its members on social media reached a fever pitch and the group began to suspect that Morse was using their events to meet and connect with students socially.

The October 5, 2019 College Democrats' event included speeches and panel presentations from several local, state, and federal officials. Student C, a College Democrats board member, invited Morse to the event months earlier and coordinated outreach to Morse and his staff. *See Exhibit 5.*²² Witness One moderated the "mayor's panel" which included Morse and mayors of surrounding Western Massachusetts communities. He and Morse spoke briefly at the panel's conclusion. According to Witness One, Morse did not indicate that he remembered Witness One from their Tinder messaging. That evening, Morse "followed" Witness One on Instagram and sent him a direct message ("DM") thanking Witness One for moderating the mayor's panel. The two began a weeklong exchange of messages via Instagram.

Witness Three also attended the October 5th event and was in the audience for the mayor's panel. When the presentation ended, Witness Three approached Morse, introduced himself, and asked about potential volunteer and internship opportunities with Morse's campaign. They spoke briefly

²⁰ See Nik DeCosta-Klipa, *This 30-year-old Massachusetts mayor is challenging New England's longest-serving congressman*, Boston.com, Jul. 22, 2019, <https://www.boston.com/news/politics/2019/07/22/alex-morse-richard-neal>.

²¹ The investigation revealed that Morse followed/messaged UMass students Witness One, Witness Three, and Witness Six as well as Student G, a non-UMass student.

²² According to the Jacques Report, Student C stated that UMass Democrats students and others were "very angry" about Morse's alleged behavior and had been pushing her to make a public statement about him "for over 3 years." However, her emails to Morse congratulating him on his decision to run for Congress and inviting him to attend the October 5, 2019 kickoff betray no such sentiment. *See Exhibit 5.*

and Morse gave Witness Three his business card.²³ By the next day, Morse followed Witness Three on Instagram and Witness Three followed him back. Although Witness Three was curious as to how Morse located him on Instagram since he did not give Morse his last name at the event, he noted that Morse also followed a number of Witness Three's friends and presumed that Morse found him through one of those shared contacts. Witness Three and Morse exchanged Instagram messages about Morse's campaign activities for a brief period. Witness Three states that he did not find anything unusual in their communications because he views Instagram as a platform for platonic connections in contrast to dating apps like Tinder. Although their communications did not include discussion of volunteer or internship opportunities with Morse's campaign, Witness Three noted that, but for the fact that he later learned of Morse having messaged other students on Tinder and Instagram, he would not have interpreted Morse's outreach to him on Instagram as evidence of interest in pursuing a physical or romantic relationship.²⁴

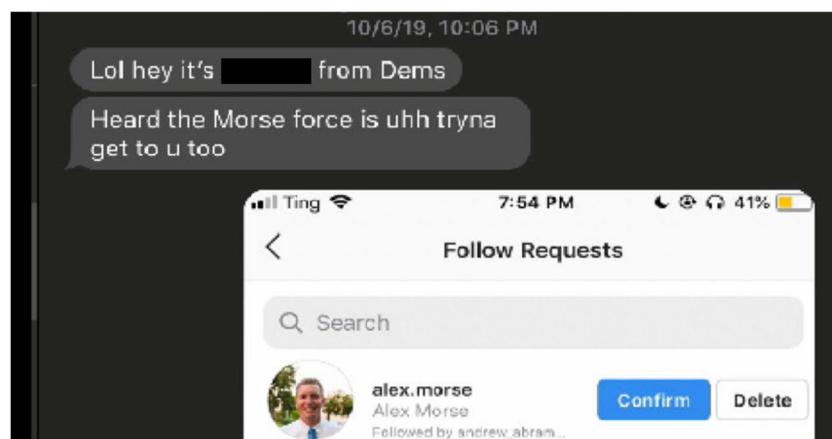
Based on Morse's rumored matching with UMass students on Tinder, Witness Three alerted Witness Two and other UMass Democrats board members to Morse's outreach to him. He also sent a screenshot of Morse's initial Instagram message. At that time, Witness Two told Witness Three that both he and Witness One had previously matched with Morse on Tinder. Witness Two also told Witness One about Witness Three having been contacted by Morse after the October 5th event.²⁵ Witness One and Witness Three knew one another from UMass Democrats but were not particularly close. On October 6th, Witness One texted Witness Three, attaching screenshots of his messages with Morse, and asked whether the "Morse force" had also contacted Witness Three:

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²³ Witness Three reports that he was later told by other students that Morse gave him a "look" when he entered the event (indicating romantic or sexual interest). Witness Three did not observe anything of that nature.

²⁴ According to the Jacques Report, Witness Three reported that, given Morse's professional stature, the initial Instagram outreach was "weird," and that he thought Morse's heart emoji response to one of Witness Three's Instagram posts was "creepy."

²⁵ Witness Three states that both Witnesses One and Two expressed discomfort with Morse's outreach to them on Tinder. While Witness Three understood their discomfort, he also questioned why a college student would set their Tinder preference to include matches in Morse's age range if, in fact, they felt that matching with someone Morse's age was "creepy."



See **Exhibit 9**.

Witness One and Witness Three continued to exchange messages in which they joked about their respective interest in pursuing a relationship with Morse. Neither appeared to view Morse's communications as evidence of Morse's efforts to secure internships or other opportunities for them. Rather, Witness Three appears to share Witness One's interpretation of Morse's outreach as problematic and suggestive of Morse's intent to pursue a dating or sexual relationship with Witness One. See generally **Exhibit 9**. In a separate exchange with Witness Two around that same time, Witness Three predicted that it was "only a matter of time" before someone like Morse gets "metooed." See **Exhibit 18**.

Witness Six, a UMass Democrats member who attended the College Democrats' October 5th kickoff, also connected with Morse on Instagram after the event. Witness Six and a female friend were in the audience for the mayor's panel and each followed Morse on Instagram while the presentation was in progress. After the panel, they introduced themselves to Morse and expressed interest in volunteering for Morse's campaign. According to Witness Six, his female friend did most of the talking. However, both were surprised when Witness Six, and not his friend, received a subsequent direct message from Morse on Instagram. Witness Six did not think the content of Morse's initial message was particularly problematic, but noted that Morse did not reach out in the "campaign kind of way" he expected. Rather, Morse's message, "Hey man, it was nice meeting you on Saturday!" coupled with the surrounding circumstances raised his suspicions; that is, Morse unexpectedly following and messaging him, and not his friend, even though she contributed more to the discussion with Morse than Witness Six. Based on these concerns, Witness Six crafted a cordial but closed-ended response to Morse because he did not want the discussion to go any further. Morse responded with a heart-shaped emoji but did not attempt to contact Witness Six again. See **Exhibit 10**. Witness Six told Witness One about Morse's outreach and, in response, Witness One cautioned Witness Six to "be careful," because Witness One had "heard things about [Morse]." On October 8th, Witness One informed Witness Two and Student C about Witness Six via their group text. See **Exhibit 11**.

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Of the three known UMass Democrats members who Morse messaged after the October 5th event, only Witness One continued communicating with Morse for an extended period. Witness One and Morse exchanged messages into November 2019. Witness One described their communications as non-intrusive but personal; for example, he would tell Morse about his family and how his classes were going and Morse would tell him about his weekend activities. Morse also made references to the two learning more about one another and getting to know each other. *See generally Exhibit 12.* At some point during their discussions, Morse added Witness One to his Instagram “close friends” stories, meaning that Witness One could see some of Morse’s posts that others could not see.

According to Witness One, the tenor of Morse’s communications changed in late October/early November when Witness One posted a photo of himself and a friend in their Halloween costumes. Witness One and his friend were dressed as Dalmatians. Both were fully clothed and the costumes showed little skin. Still, Witness One felt that the costume was sexually provocative because his shirt had fishnet material along the arms and chest area and he and his friend were seated at the end of a leash. Soon after Witness One posted the photo, Morse commented “Cute costume!” to which Witness One replied, “Thanks!” However, Witness One discontinued communications with Morse from that point. He did not “unfollow” or “block” Morse. To Witness One, Morse’s comment meant that Morse, too, thought the costume was sensual, which made Witness One uncomfortable. He began to feel that, if Morse intended their relationship to be professional, then Morse would have emailed him rather than communicated via Instagram. Witness One added that he became increasingly “creeped out” because of Morse’s age, but at the same time, felt that he had no choice but to respond to Morse’s messages. Though never expressly stated or insinuated by Morse, Witness One was concerned that Morse could potentially use his influence as a mayor to interfere with Witness One’s prospects of working in politics.

As he did with the Tinder communications in September, Witness One shared his and Morse’s ongoing Instagram dialogue with his fellow UMass Democrats board members and others. In his interview, Witness One acknowledged that much of his and his friends’ fall 2019 discussion about Morse was immature. From the onset, it is clear that the group interpreted Morse’s outreach as suggestive of his intent to pursue a dating or sexual relationship with Witness One. For example, their messages included the following:

Witness One shared Morse’s first Instagram message:

Good job today! Nice seeing you again. I enjoyed the panel.

Witness Two replied stating:

You have to reply with something dirty

Flirty^^^^

Student C remarked:

Yeah [REDACTED] you should honestly hit him up like I'm kind of joking but also that would low key be cute

Alluding to Morse's status as Holyoke mayor, Witness Two chimed in:

First gent of Holyoke

Student C then asked Witness One what, if anything, prevented Witness One from pursuing a romantic relationship with Morse, to which Witness One replied:

Cause I would only be doing it for political reasons

I'm only somewhat attracted to him for the clout

He'd give you a campaign job

Witness One replied:

I'm just gonna lead him on and then when I run for something ask for his advice support and money

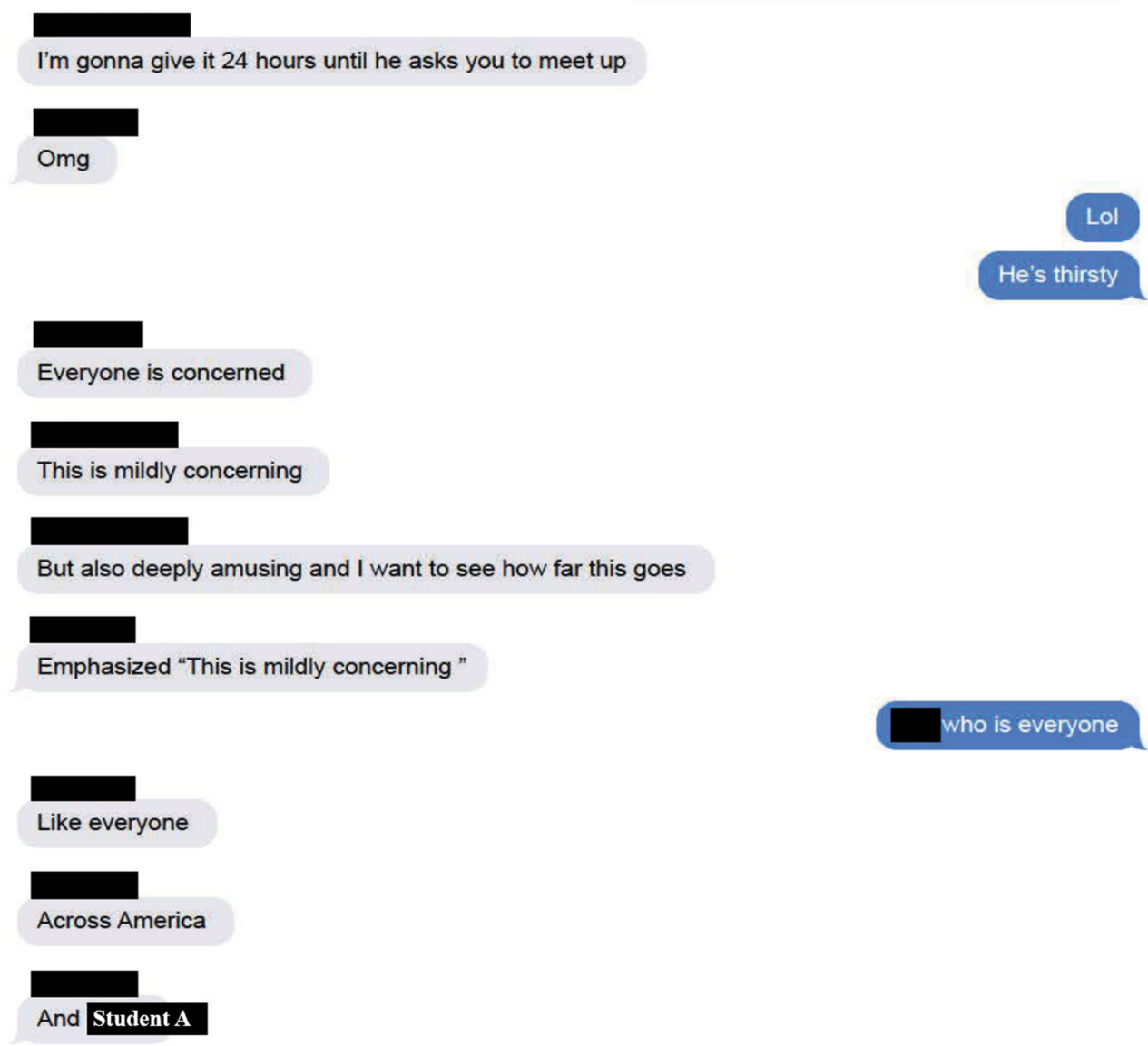
See Exhibit 13.

C. UMass Democrats Board Members' Growing Concerns About Morse

Despite the light-hearted nature of their initial chat messages in the aftermath of the October 5th College Democrats event, College Democrats' and UMass Democrats' board members were also troubled by Morse's conduct and grew increasingly concerned as time progressed and as reports of Morse's outreach to other students accumulated. On October 6th, for instance, the following exchange took place:

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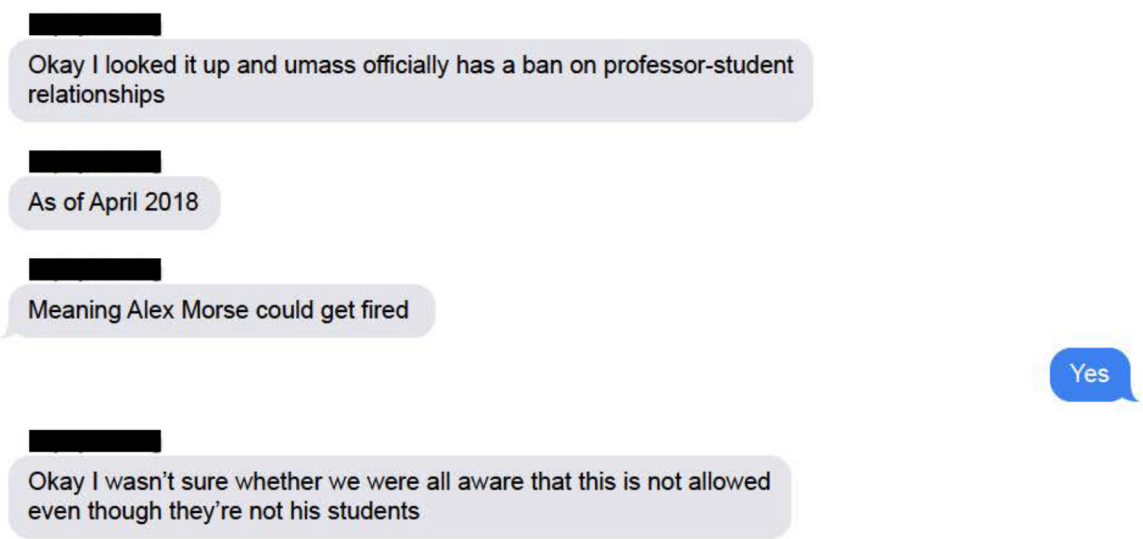
See Exhibit 14.

According to several witnesses, Student A reported to her fellow board members that she knew of at least two UMass students who were purported to have had sexual contact with Morse, one of whom reported to her that he felt uncomfortable about the encounter in its aftermath.²⁶ At the time, Student A was one of the most outspoken UMass Democrats board members advocating for

²⁶ Student A denied the Investigators' interview requests. As such, we cannot confirm her report to her fellow board members that she received firsthand accounts from students alleging to have had sexual contact with Morse.

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the need to limit Morse’s interactions with UMass Democrats. She was not alone, however. Within weeks of the October 5th College Democrats kickoff event and Morse’s outreach to at least three (3) UMass students, the board members began to educate themselves as to the potential consequences of Morse’s social media communications and related behavior. On November 6, 2019, the following exchange took place between Student C and Witnesses One and Two:



See **Exhibit 15**.

Witness Two recalled that UMass Democrats board members began discussing their collective concerns about Morse’s behavior in October 2019 following the College Democrats event. At that time, the board only discussed whether or not to encourage members to support Morse’s congressional campaign. Witness Two reports having received a call from Morse’s campaign manager, Max Clermont, asking him to tell UMass Democrats members about an intern program with Morse’s campaign. Despite having e-mailed Morse in September seeking such opportunities for UMass Democrats members,²⁷ Witness Two told the UMass Democrats board that he did not want to advertise the opportunity due to concerns about Morse’s conduct. The board agreed and ultimately determined that they would not promote opportunities for their members to work with Morse but that they would not discourage members from pursuing such activities on their own.

Over the next several months, UMass Democrats board members received additional reports of Morse’s communications with other students over social media. On October 24th, Student C told Witness One that Morse followed Student G, another College Democrats member (a non-UMass student), on Instagram and added the student to his Instagram “close friends” story. See **Exhibit 16**. In addition, in February 2020, while attending the College Democrats of America Conference in Arizona, UMass Democrats board members met Student D, a non-UMass student, who told

²⁷ See **Exhibit 8**.

them that Morse also followed him on Instagram after the two met at a fundraising event at another school.²⁸ According to Student D, Morse sent him direct messages commenting on Student D's photos in a manner Student D deemed flirtatious.

In June or July 2020, Witness Seven, another UMass Democrats board member and her boyfriend, who was also in UMass Democrats, decided to "test" whether Morse only communicated with young men over social media. Witness Seven was already following Morse on Instagram, but she unfollowed him, and then followed him again at the same time that her boyfriend started following him in hopes that Morse would receive simultaneous notices of the students' following him on Instagram. As Witness Seven suspected, Morse followed her boyfriend back within a day, but never followed Witness Seven back. She believed this proved her theory that Morse was only communicating with male students.

Over the course of the summer, the UMass Democrats board continued to field anecdotes from its members and others who claimed to have knowledge of Morse's intimate contact with students. Witness One and Witness Seven recalled that UMass Democrats board member Student A reported that she had heard directly from two UMass students who revealed to her that they had sexual contact with Morse. According to Witness One and Witness Seven, Student A reported that one of the students felt uncomfortable about his encounter with Morse after learning that Morse was the mayor of neighboring Holyoke.²⁹

Due to Morse's seemingly ongoing troublesome conduct, UMass Democrats board members began to further distance the organization from Morse and his campaign in the 2020 spring semester. According to Witness One, College Democrats held 9 virtual "Congressional Town Hall" events in the spring of 2020 where local elected officials and candidates were featured speakers. Morse was purposefully not invited. The UMass Democrats board also intentionally withheld announcements to their members about intern opportunities on Morse's campaign that his campaign manager, Max Clermont, asked them to advertise and promote.

²⁸ According to Witness One and Witness Seven, Student D approached the UMass Democrats group after learning that they were from Morse's part of the state and struck up a conversation during which he revealed that he was communicating with Morse on Instagram.

²⁹ According to the Jacques Report, Witness One reported that Student A told him of "multiple friends" who felt uncomfortable about their sexual encounters with Morse. In contrast, Witness One told the Investigators that only one of Student A's friends felt uncomfortable about his sexual contact with Morse which matches Witness Seven's recollection of what Student A reported to the UMass Democrats board. Witness One did concede, however, that he struggled to separate information he knew prior to August 6th from details he learned after College Democrats sent the letter to Morse.

D. UMass Democrats' Internal Disagreements About Morse

Not all UMass Democrats members were aware of the board's concerns. In fact, a number of non-board members continued to support Morse and his campaign. Witness Eight, for instance, had a years-long relationship with Morse. At the College Democrats October 5th event, she reconnected with Morse and, by the end of November, was volunteering on his congressional campaign. Witness Five, another non-board member, began supporting Morse's campaign after reading an article about him in September 2019. Witness Three, seemingly undeterred by Morse's subsequent outreach to him via Instagram after the October 5th event, also supported Morse's campaign. *See supra* section III(B), p.8-9.³⁰

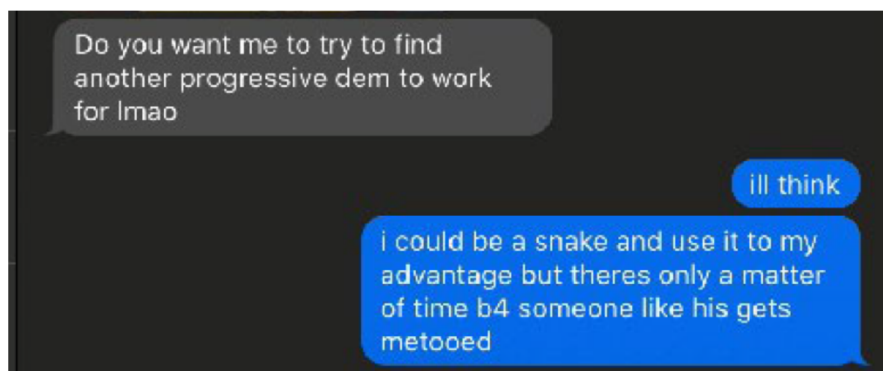
Witnesses Three, Five and Eight recalled instances in which Witness Two expressed bias against Morse in favor of Rep. Neal who Witness Two identified as a potential source of post-graduate employment. In the wake of his revelation to Witness Two that Morse had followed him on Instagram after the College Democrats event, Witness Three recalled Witness Two stating over text message that Morse's behavior had caused Witness Two to be a "Neal Stan."³¹ *See Exhibit 17*. The two discussed the possibility of Morse being "me tooed" and the potential damage his conduct could do to his campaign: In one message, Witness Two inserted a meme depicting the aftermath of the leak of Morse's behavior to the public:



³⁰ Witnesses Three, Five and Eight all report that they continued to support Morse's campaign even after release of the August 6th letter.

³¹ According to the Urban Dictionary, "stan" is an overzealous maniacal fan for any celebrity or athlete. Urban Dictionary (Jan. 2, 2006), <https://www.urbandictionary.com/define.php?term=Stan>.

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See Exhibit 17.

Witness Two recalled stating that it would “sink Morse’s campaign” for Congress if more people knew about his behavior with college students. Witness Two explained, however, that he did not mean that *he* would sink Morse’s campaign; rather, he meant that if people knew about Morse’s conduct with college students, that would inevitably have a negative impact on his chances for winning the congressional election. Witness Two also acknowledged having made “flippant” remarks about his job prospects with Rep. Neal and stated that these remarks were intended as a joke, as was the meme depicting Morse being taken away by the “horny police” after his conduct was made public.

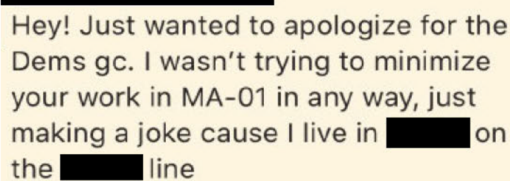
There was no evidence of Witness Two or any other UMass Democrats board member having contacted Rep. Neal or his campaign about Morse’s alleged conduct. Similarly, there is no evidence that Rep. Neal or anyone working on his behalf had any knowledge or involvement in this matter. The evidence does reveal that Witness Two, despite having been an active participant in board member group chats about the troubling nature of Morse’s conduct, had all but disappeared from the discussions by the spring of 2020. He did not take part in any of the summer of 2020 discussion between UMass Democrats and College Democrats board members about

going public with the allegations against Morse and was only contacted about the letter on the eve of its public release.

UMass Democrats non-board members also expressed frustration at what they perceived as the board's fostering of a culture in the organization that, without explanation, inappropriately discouraged support for Morse, particularly in the months leading up to the August 6, 2020 disinvitation letter. Witness Eight recalled that, during the fall of 2019, she occasionally posted in the UMass Democrats members' GroupMe about opportunities for other students to join her as a volunteer on Morse's campaign. However, no one responded.³² In contrast, the other GroupMe participants seemed to always respond when members posted about volunteer opportunities on other campaigns. In particular, according to Witness Eight, there was one UMass Democrats board member, Student E, who typically "liked" all campaign-related posts, but never liked Witness Eight's posts about Morse. Moreover, UMass Democrats board members never included volunteer opportunities for Morse's campaign in emails to UMass Democrats members listing volunteer opportunities for other campaigns.

Witness Eight's frustration intensified on August 2, 2020 after she posted yet another volunteer opportunity for the Morse campaign in the UMass Democrats GroupMe chat and received no support. On that day, several UMass Democrats members posted about volunteer opportunities on other campaigns and other members "liked" and responded to the posts. Witness Eight then posted stating that she was working on Morse's campaign and that anyone interested in joining should contact her for information. The sole response to her post was from Witness One, who replied that Eastern Massachusetts elections were the only ones that mattered. Witness Eight felt this response minimized the Morse congressional race and was part of a pattern of unwelcoming responses. So, she quit the GroupMe. Minutes later, she received a series of DM's from three UMass Democrats board members apologizing for any unintended offense and expressing that they hoped she would remain active in the group.

From Witness One:

A screenshot of a text message on a yellow background. The text reads: "Hey! Just wanted to apologize for the Dems gc. I wasn't trying to minimize your work in MA-01 in any way, just making a joke cause I live in [REDACTED] on the [REDACTED] line". There is a heart icon to the right of the text. The sender's name is redacted with a black box.

Hey! Just wanted to apologize for the Dems gc. I wasn't trying to minimize your work in MA-01 in any way, just making a joke cause I live in [REDACTED] on the [REDACTED] line

³² In early 2020, Witness Eight reports that Morse's campaign manager, Max Clermont, told her that Witness Two had not responded to emails asking Witness Two to share announcements about campaign volunteer opportunities with UMass Democrats members.

Witness Eight received the following message from Student E.
Witness Eight did not respond.

Hey! There's a lot going on in the groupchat and I just wanted to let you know we weren't ignoring you and we value your voice and hope you'll stay involved, people were just saying a lot at the same time

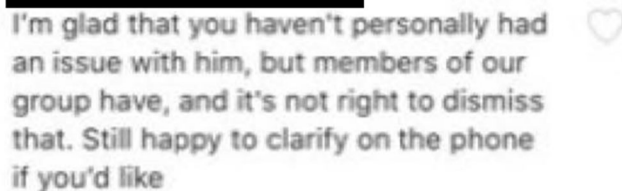
Witness Eight received the following message from Student A.

Hey. My name is [REDACTED] and I'm in the udeMs eboard. Sorry for brushing your comments about Alex Morse but we've had some situations with his campaign. If you'd like to talk on the phone I can explain to you what happened. Either way hope you stay involved in udeMs, we try to be welcoming but kinda freaked out when you mentioned him

Witness Eight replied to Student A:

i've known him for over 10 years and have never had any issues, i've only heard from our campaign that we have tried to reach out for him to come speak at Dems and were never gotten back to. i'm only trying to share opportunities for other students multiple times but if there was an issue with him and a board member that shouldn't effect the entire group, and isn't welcoming.

Student A responded to Witness Eight with the following message.



I'm glad that you haven't personally had an issue with him, but members of our group have, and it's not right to dismiss that. Still happy to clarify on the phone if you'd like

See Exhibit 18.

Witness Eight did not reply to Student A's last message, nor did she speak with Student A on the phone.³³

E. Events Leading to the UMass Democrats' Decision to Publicly Disinvite Morse From Future Events

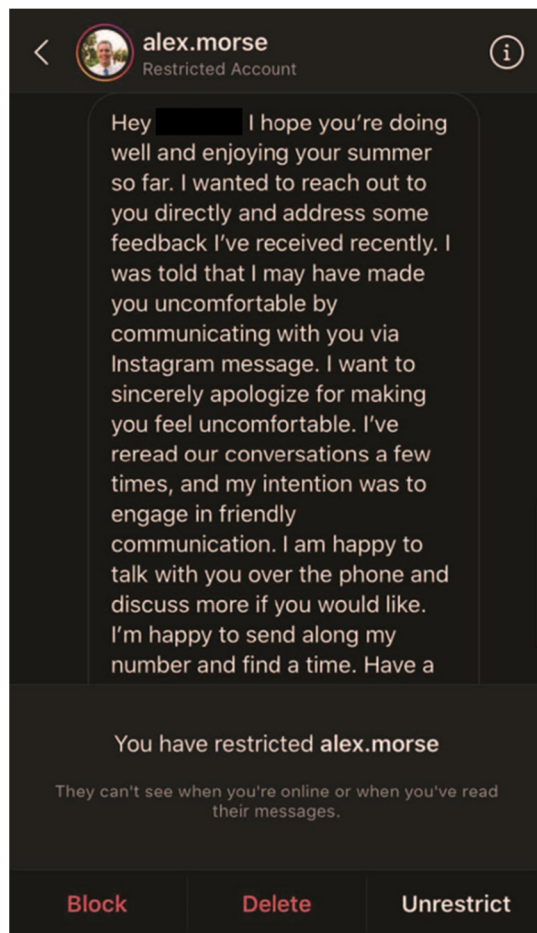
By June of 2020, the UMass Democrats board members' internal discussions about Morse became fodder for media inquiries. Several board members, including Witnesses One and Two, submitted to "off-the-record" interviews in which they reported what they knew or had heard secondhand about Morse. On July 22, 2020, Student E responded to a Twitter post supportive of Morse with a tweet of her own that read, "Big thumbs down...if you know, you know." According to the Jacques Report, Students C and E received an email from Max Clermont, Morse's campaign manager the very next day inviting both students to contact him to discuss the matter.³⁴ Neither student responded to Clermont. Shortly thereafter, Witness One received the following Instagram message from Morse – the first since Morse commented on Witness One's Halloween costume:

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³³ In a separate chat, Witness One, Student A, and Student E discussed Witness Eight's exit from the GroupMe chat and debated how to respond. *See Exhibit 19.*

³⁴ According to the Jacques Report, Clermont's email reads,

"I saw [Student E's] tweet about Alex Morse and I wanted to reach out to you both directly. I've been a close personal friend to Alex for years and am now managing his campaign. I want to hear what you have to say and any feedback you have about him or the campaign."



See Exhibit 20.

Witness One did not respond to Morse's message, and reports that he blocked Morse from communicating with him again on Instagram.

According to Witness Two, UMass Democrats and College Democrats board members began speaking to the media because they had come to believe that Morse's conduct rendered him unfit for congressional office. Morse's campaign was gaining national attention and, according to Witness One, he and his fellow UMass Democrats and College Democrats leaders felt compelled to publicize their decision not to support his campaign so as to discourage others from voting for him. He describes feeling a sense of "urgency" that was exacerbated by the "pressure" of constant media inquiries about Morse.

Witness One describes Student A as especially adamant that the group needed to go public with what they knew. As previously discussed, Student A had reported to her fellow board members that two different UMass students had reported to her that they each had sexual encounters with Morse. She and others clearly articulated their views in the board members' GroupMe chat:

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Student A stated:

Can I just expose Alex Morse on Twitter

10:17:11 PM EDT

Aren't we part of the problem if we stay silent. It's a serious question I've been asking myself

10:23:48 PM EDT

Student E similarly expressed:

It's just so gross and it says something about his character which his voters deserve to know

10:26:43 PM EDT

Yet another UMass Democrats board member shared:

I think its good if he gets exposed

10:32:54 PM EDT

See Exhibit 21.

With Witness One's help, Student A drafted a statement regarding Morse's behavior that she intended to post on Twitter, though she ultimately did not post it. By July 23, 2020, Witness One, Student A, and College Democrats board members, led by Student C, were in agreement that the organizations would co-author a statement regarding the allegations against Morse. Student A's unsent Twitter statement formed the basis for the letter the group ultimately sent.

Witness One recalled that as the students prepared the written statement to Morse, Student C began contacting Massachusetts Democratic Party officials for advice on the best approach for delivering or releasing the statement. According to Witness One, Student C spoke first to an attorney for the Young Democrats of Massachusetts who advised against making a public statement, warning that persons who wanted to remain anonymous would eventually have to be named if there was legal action.³⁵

³⁵ According to the Jacques Report, Student C stated that the Young Democrats of Massachusetts also advised against making a private statement to Morse, and recommended that the students contact a Title IX attorney or someone in UMass administration since Morse taught there. College Democrats did not follow this advice. It is unclear whether Student C passed the recommendation along to her UMass Democrats colleagues. However, none of the UMass Democrats board members reported or advised the University faculty or administration about the Morse matter prior

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Student C also sought guidance from Gus Bickford of the Massachusetts Democratic Party. Bickford, along with Veronica Martinez, another state party official, agreed to meet with the group on the evening of July 28, 2020 via videoconference. During the meeting, Witness One told Bickford and Martinez about his experience with Morse and about other students that communicated with Morse on Tinder and Instagram. Student C told them about students she knew who Morse followed on Instagram and were put in his “close friends” story. Student A told them about her friend who had sexual contact with Morse and who later felt uncomfortable by the “power dynamic.” Witness One recalled that Bickford was surprised by their allegations because he knew Morse and did not know him to behave inappropriately. Still, Bickford sympathized with the students’ concerns and proposed that they consult with the state party’s attorney, Jim Roosevelt, for his recommendations.

On July 29, 2020, Student C met with Bickford and Martinez again. She reported the results of that meeting to Witness One and others in the GroupMe chat:

Just talked to Gus and Veronica: they talked to the lawyer and the lawyer said the we need to email Alex Morse’s campaign manager and tell him that Alex is no longer welcome at CDMA events (and UMass Dems probably) for xyz reasons. We would vote on that statement before sending it to Morse’s campaign. We would then send it the MassDems’ counsel for safekeeping. Then, if we want to move forward to leaking it to the press, someone would contact [REDACTED] and tell him (on the record, but unattributable so their name doesn’t get published) that the CDMA eboard voted on this and sent it to the CM. That way, [REDACTED] reaches out to the campaign for comment instead of reaching out to us again.

See **Exhibit 22**.

In the chat, Student C goes on to describe advice she received from Bickford and Roosevelt about the potential legal ramifications of leaking the letter to the media. See *id.*

On July 31, 2020, Witness One held a Zoom video call with UMass Democrats board members from the current and previous academic years and asked them to sign on to the letter “in solidarity” with College Democrats. Witness Two and Witness Seven attended the Zoom call. They both recall that, during the meeting, Witness One used Zoom’s “share screen” function to show everyone the proposed letter while he verbally summarized its contents. The board then voted to sign on to the letter. Witness Seven acknowledged, however, that at the time of the board’s vote, Student A was the only board member who had received a firsthand account from a UMass student who reported having had sexual contact with Morse and feeling uncomfortable about it, and

to release of the letter. On the eve of the letter’s release, Witness One states that Student A contacted the University’s Student Legal Services Office but that they did not receive a response before August 6th.

Witness One was the only board member who personally communicated with Morse on social media and reported feeling uncomfortable about it. While the board members were aware of two UMass Democrats non-board members who Morse followed on Instagram after the October 5th College Democrats event, it does not appear that those students reported a degree of discomfort with Morse that would require UMass Democrats to disinvite Morse from future events, nor does it appear that the board members sought input from these students prior to reaching their decision.³⁶

On August 6, 2020, Student C, acting on behalf of College Democrats, UMass Democrats, and Amherst College Democrats, emailed the groups' statement to Morse and his campaign. *See Exhibit 1.*³⁷

F. Events Following the August 6, 2020 Letter to Morse

On August 9, 2020, Morse issued a public statement wherein he admitted to having had consensual relationships with local college students whom he met using dating apps; however, he denied ever having a non-consensual sexual encounter with anyone, and denied that he ever used his position as Mayor of Holyoke or a UMass lecturer for romantic or sexual gain or to take advantage of students. *See Exhibit 3.* By August 11, 2020, a competing narrative began to emerge, one that highlighted the apparent inconsistency between the jovial tone and mocking nature of text and chat messages involving UMass Democrats board members and the letter's claims that Morse engaged in predatory behavior. In addition to the leak of a number of these messages to the media, a number of UMass Democrats non-board members publicly described Witness Two's purported hope for future job prospects with Morse's opponent in the congressional race, and his having openly contemplated leaking allegations of Morse's conduct to the media to "sink [Morse's] campaign."

In response to the articles, numerous people emailed Witnesses One and Two condemning the allegations against Morse as unsubstantiated and accusing the students of promoting homophobic stereotypes about members of the LGBTQ community. *See, e.g. Exhibits 23 and 24.* Backlash against them and other UMass Democrats board members was widespread and sometimes vitriolic.

While stopping short of retracting the allegations against Morse, the UMass Democrats board sent Morse an email apologizing for the homophobic backlash that resulted from media reports of the allegations against him. *See Exhibit 2.*³⁸ According to Witness Seven, she and the other board members wanted to make clear that they did not intend for the August 6, 2020 letter to be made

³⁶ According to the Jacques Report, Student C reported that students did not want to attend College Democrats events out of concern for Morse "trolling" after events and "connecting with young students."

³⁷ In addition to the email sent to Morse, Student C also emailed all College Democrats chapter presidents a statement drafted by Attorney Roosevelt which advised that the boards of College Democrats, UMass Democrats, and Amherst College Democrats voted to disinvite Morse from future events due to his interactions with students. *See Exhibit 4.*

³⁸ According to Witness Seven, Morse did not respond to the email.

public,³⁹ and that they did not intend to alienate Morse’s supporters within UMass Democrats. Witness Seven reported that, in hindsight, the letter’s tone was “careless” in that it fed into homophobic stereotypes. She also acknowledged that the UMass Democrats board members did not have firsthand knowledge of some of the letter’s allegations. However, based on what they knew at the time, she felt that there were “real victims” of Morse’s conduct in the student community and that no one on the board had any malicious intent.

On September 3, 2020, Morse lost the democratic primary election in his congressional race.

IV. Applicable Policies & Guidelines

The Investigators assessed Morse’s alleged conduct to determine whether a preponderance of the evidence supported a finding that he violated the following University policies.⁴⁰

- *University Policy on Consensual Relationships between Faculty and Students (See Appendix A);*
- *University Principles of Employee Conduct (See Appendix B); and*
- *University Policy Against Discrimination, Harassment, and Related Interpersonal Violence (See Appendix C).*

V. Findings and Closing

A. Alex Morse Frequently Communicated with University Students on Social Media in a Manner Reasonably Interpreted by Those Students and Others as Suggestive of His Intent to Pursue Dating or Sexual Relationships.

The preponderance of the evidence supports a finding that, as early as 2015, members of UMass Democrats and other University students were contacted by and communicated with Alex Morse on social media and dating apps like Tinder and Instagram. As Morse himself admits, he entered into personal and dating relationships with students he met using these apps. According to multiple witnesses, Morse’s conduct was widely known amongst UMass Democrats and others in the University community either through their own personal experience or secondhand accounts from their friends and fellow students. The Investigators interviewed three (3) UMass Democrats members with whom Morse initiated or fostered communication in the immediate aftermath of the

³⁹ Based on the GroupMe chats, however, it appears that several of the College Democrats and UMass Democrats board members intended to leak, if not the letter itself, its central allegations.

⁴⁰ The University’s standalone Title IX policy took effect after the conduct alleged in the College Democrats August 6th letter. Prior to that time, such conduct was assessed pursuant to the UMass Policy Against Discrimination, Harassment and Related Interpersonal Violence (2018 version).

October 5, 2019 College Democrats kick-off event. The evidence also shows that a fourth individual, a non-UMass student, was contacted later that month.

While the messages these students received are not overtly sexual in nature, they do not contain offers of volunteer opportunities with the campaign or similar language. Instead, the exchanges, with their various “get to know you” type questions and heart-shaped emojis from Morse, are of the type one would expect college-aged peers to engage in with one another. Morse was not a part of the students’ peer group, however, and the messages were not viewed in isolation. Rather, the recipients and others with whom they shared Morse’s communications interpreted Morse’s messages as suggestive of his intent to pursue dating or sexual relationships with students due, in large part, to Morse’s reputation in the community as someone who engaged with students on social media and entered into dating and sexual relationships with students. His past conduct, largely conceded by Morse himself, could not be divorced from the messages these students were reading and Morse’s seemingly purposeful exclusion of their female friends from such communications. That interpretation was reasonable under the circumstances and the Investigators conclude that the preponderance of the evidence supports a finding that Morse communicated with University students in pursuit of dating or sexual relationships with students.

B. Alex Morse’s Pursuit of Dating or Sexual Relationships with University Students via Social Media did not Violate the University’s Policy on Consensual Relationships because Morse did not have Grading, Supervisory, Advisory or Employment Responsibility for the Students.

The University *Policy on Consensual Relationships Between Faculty and Students* provides, in pertinent part:

In order to avoid any conflict of interest or abuse of authority, any faculty member who has any responsibility for supervision, evaluation, grading, advising, employment, or other instructional or supervisory activity related to a student or postdoc is prohibited from entering into a sexual relationship with that individual beginning with the effective date of this policy.

The College Democrats August 6th letter raises three central allegations: (1) that Morse regularly matched with its members and other students on dating apps such as Tinder and Grindr; (2) that Morse used College Democrats events to meet college students and to later connect with them via social media in a manner that made the students uncomfortable; and (3) that Morse had sexual contact with college students including University students. Of these central allegations only the third, that Morse had sexual contact with University students, is contemplated by the University’s *Policy on Consensual Relationships Between Faculty and Students*, which prohibits sexual relationships between faculty and students over whom the faculty member has responsibility for supervision, evaluation, grading, advising, employment, or other instructional or supervisory activity. In its policy, the University strongly discourages faculty from engaging in such relationships, characterizing them as “inherently problematic” in nature and “inconsistent with the

educational mission of the University.” By its terms, however, the policy does not appear to prohibit faculty members from *pursuing* sexual relationships with students over whom the faculty member has the aforementioned responsibilities. Where, like here, the preponderance of the evidence supports a finding that Morse intended to, but did not, engage in such relationships, the Investigators cannot conclude that his conduct violated the policy and leave to the University leadership to determine whether the policy should be amended or whether the conduct alleged here is violative of some other generalized employee conduct policy.

Even if the Investigators were to interpret the policy broadly to encompass Morse’s purported pursuit of such relationships, there is insufficient evidence that the UMass Democrats members and others with whom Morse engaged on social media were students in Morse’s class at the time of the communications or that Morse had some other supervisory, advisory or employment relationship with the students with whom he engaged on social media.⁴¹ While the Investigators received multiple witness reports of current and former University students who either matched with Morse on Tinder or had sexual relationships with Morse, including those students that Student A revealed to UMass Democrats and College Democrats board members prior to the letter’s release, the Investigators could not confirm these reports and none of the students identified were students in Morse’s class or appear to have been supervised, advised, or employed by Morse.⁴² The lone exception, Student B, who reportedly told Witness Two (and others) that he matched with Morse on Tinder, was a student in Morse’s class prior to implementation of the *Consensual Relationships* policy.⁴³ The Investigators similarly note that both Witness Three and Witness Six approached Morse at the October 2019 College Democrats event to inquire about potential internships or other volunteer opportunities. Those efforts, if successful, may have created employment or supervisory relationships between Morse and these students that arguably would have implicated the *Consensual Relationships* policy. However, neither student continued his online communications with Morse after feeling discomfited by his initial messages.

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⁴¹ It appears that the College Democrats and UMass Democrats board members conceded as much as they drafted the letter disinviting him from future events. *See Exhibit 25.*

⁴² Among the unconfirmed secondhand reports the Investigators received was that of Student F, who is purported to have had sexual contact with Morse and having expressed feelings of discomfort about the encounter after the fact. The Investigators note that Student F has not been a student in Morse’s class and, as such, a sexual relationship between he and Morse, even if confirmed, would not violate the terms of the *Consensual Relationships* policy.

⁴³ Student B did not respond to interview requests.

C. Alex Morse’s Pursuit of Dating or Sexual Relationships with University Students Made a Number of Students Uncomfortable and Led to the UMass Democrats’ Decision to Disinvite Him from Future Events but did not Unreasonably Interfere with any Student’s Academic Performance or Ability to Participate in University Programs or Activities under the University’s Sexual Harassment Policy.

The Policy provides, in relevant part:⁴⁴

Sexual Harassment is unwelcome conduct of a sexual nature when:

- i. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, education, or participation in University programs or activities; or
- ii. Submission to or rejection of such conduct by a person is used as a basis for employment or educational decisions affecting such person or persons, or participation in University programs or activities; or
- iii. Such conduct unreasonably interferes with a person or person’s work or academic performance; interferes with or limits a person or person’s ability to participate in or benefit from a work or academic program or activity; or creates an intimidating, hostile, or offensive working or academic environment.

Unlike the *Consensual Relationships* policy, the University policy against sexual harassment does not require the existence of a sexual relationship nor does it require that the faculty member have a grading or supervisory relationship over the involved student. Rather, for purposes of this matter, it prohibits “unwelcome conduct of a sexual nature” that: unreasonably interferes with a student’s academic performance; limits a student’s ability to participate in or benefit from an academic program or activity; or creates an intimidating, hostile, or offensive academic environment.

Having concluded that the preponderance of the evidence supports a finding that Morse communicated with students on social media in pursuit of dating or sexual relationships with students, the Investigators also conclude that Morse’s conduct was sexual in nature. As detailed above, Morse’s messages, while not overtly sexual, when viewed in the light of his reputed and admitted history of engaging in dating and sexual relationships with students, could be and were reasonably interpreted by students to be suggestive of his intent to pursue such relationships here. The weight of the evidence also supports a finding that at least two students, Witness One and Witness Six, viewed Morse’s conduct as unwelcome.⁴⁵

⁴⁴ The applicable Policy Against Discrimination, Harassment and Related Interpersonal Violence is that which was in effect during the time of Morse’s alleged misconduct (2014-2019). The policy was updated and reissued on August 14, 2020.

⁴⁵ According to the Jacques Report, Witness Three also characterized Morse’s communications as “creepy.”

Witnesses One and Six both cut off communications with Morse based on their individual discomfort with the direction in which the messages appeared to be taking. For Witness One, Morse's appreciation of Witness One's Halloween costume, which Witness One believed to be somewhat provocative in nature, confirmed his belief that Morse sought to engage him in a sexual relationship.⁴⁶ Witness Six was almost immediately unsettled by the overly familiar tone of Morse's initial message coupled with Morse's apparently purposeful exclusion of Witness Six's female friend from the communications.⁴⁷ However, neither Witness One nor Witness Six reported, nor does the evidence support a finding, that Morse's conduct interfered with their ability to participate in University programs or activities or that Morse's conduct created, for them, a hostile or offensive academic environment. As such, the Investigators conclude that Morse's conduct, while unwelcome and of a sexual nature, did not run afoul of the University's sexual harassment policy.

The protections of the University's sexual harassment policy are not limited to the students who were the subject of Morse's unwelcome conduct, however. The evidence shows that multiple UMass Democrats board members and others were also discomfited by Morse's conduct and that discomfort ultimately led to the August 6, 2020 decision to disinvite Morse from future College Democrats and UMass Democrats events. In addition to hearing from Witnesses One and Six, the evidence suggests that the board members received multiple reports from their members relating to Morse's social media communications and alleged sexual activities. One board member, Student A, claimed to have heard, firsthand, from a University student who had sexual contact with Morse and became uncomfortable about the encounter after learning that Morse was the Mayor of Holyoke. College Democrats and UMass Democrats board members determined that the August 6, 2020 letter disinviting Morse from future events was warranted because of numerous requests from "students who have been personally affected by Morse's actions" that the organizations refrain from working with Morse in the future. While events sponsored by UMass Democrats, a registered student organization, may constitute "University programs or activities" for purposes of the sexual harassment policy, the pre-August 6, 2020 measures board members took to exclude Morse illustrate that Morse's presence at future events was not required. Similarly, there is insufficient evidence of any student having reported that Morse's presence at future events would unreasonably interfere with their ability to participate to a degree that would warrant a finding that Morse's conduct violated the policy.

⁴⁶ Witness One admits that his discomfort with Morse's conduct stemmed from Morse's status as an elected official rather than his position on the University's faculty and points to the power imbalance created by Morse's political influence as contributing to his sense that he had no choice but to respond to Morse's messages.

⁴⁷ Witness Six signaled his intent to cut off communications with Morse by sending what he thought to be a closed-end response to Morse's message. Morse replied with a heart-shaped emoji. See **Exhibit 10**.

D. Alex Morse’s Pursuit of Dating or Sexual Relationships with University Students May Be Inconsistent with the University’s Principles of Employee Conduct.

Having determined that the preponderance of the evidence does not support a finding that Morse’s pursuit of dating or sexual relationships with students he met at student-organized events violated the letter of the aforementioned policies, the Investigators defer to University leadership’s judgment the question of whether the conduct falls short of other more generalized policies governing employee conduct including the University’s *Principles of Employee Conduct* which details the University’s values, standards, and expectations for its employees. *See Appendix B.*

VI. List of Exhibits

- Exhibit 1. College Democrats’ August 6, 2020 Email to Alex Morse Disinviting Morse from Future Events
- Exhibit 2. UMass Democrats Board’s August 28, 2020 Letter of Apology to Alex Morse
- Exhibit 3. Alex Morse’s August 9, 2020 Public Statement Regarding the College Democrats Letter
- Exhibit 4. College Democrats Board’s August 7, 2020 Email to its Chapter Presidents Advising of the Board’s Decision to Disinvite Morse from Future Events (draft and final versions)
- Exhibit 5. Student C’s July 25, 2019 Email to Alex Morse Inviting Morse to Attend the College Democrats October 5, 2019 Western MA Kickoff Event
- Exhibit 6. *Western Mass Politics & Insight*, “Has Morse Begun to Telegraph His Next Move,” (April 15, 2019)
- Exhibit 7. Screenshot of Witness One’s September 2019 Notification of Tinder Match with Alex Morse
- Exhibit 8. Witness Two’s September 16, 2019 to Alex Morse requesting campaign volunteer opportunities on behalf of UMass Democrats
- Exhibit 9. Screenshots of Witness One and Three’s October 6, 2019 Text Messages Regarding their Instagram Communications with Alex Morse
- Exhibit 10. Screenshots of Witness Six’s October 8, 2019 Instagram Communications with Alex Morse

- Exhibit 11. Screenshots of Witness One, Witness Two and Student C’s October 8, 2019 Chat Messages Regarding Alex Morse’s Instagram Outreach to Witness Six
- Exhibit 12. Screenshots of Witness One’s October 2019 Instagram Communications with Alex Morse
- Exhibit 13. Witness One, Witness Two and Student C’s October 6, 2019 Chat Messages Regarding Alex Morse’s Instagram Communications with Witness One
- Exhibit 14. UMass Democrats Board Members’ October 6, 2019 Chat Messages Regarding Alex Morse’s Conduct
- Exhibit 15. UMass Democrats Board Members’ November 6, 2019 Chat Messages Regarding the University’s *Policy on Consensual Relationships*
- Exhibit 16. Witness One, Witness Two and Student C’s October 24, 2019 Chat Messages Regarding Alex Morse’s Instagram Outreach to Student G
- Exhibit 17. Screenshots of Witness Two and Witness Three’s October 2019 Text Messages Regarding Morse’s Conduct
- Exhibit 18. Screenshots of Witness Eight’s August 2, 2020 Messages from UMass Democrats Board Members
- Exhibit 19. UMass Democrats Board Members’ August 2, 2020 Chat Messages Regarding Witness Eight
- Exhibit 20. Screenshot of Alex Morse’s June 2020 Instagram Message to Witness One
- Exhibit 21. UMass Democrats Board Members June 28, 2020 Chat Messages Regarding Decision to Publicize Allegations Against Alex Morse
- Exhibit 22. Witness One, Student A, Student C, and Student G’s July 29, 2020 Chat Messages Regarding Communications with the Democratic State Committee
- Exhibit 23. August 11, 2020 email to Witness One Regarding the College Democrats Letter
- Exhibit 24. August 12, 2020 email to Witness Two Regarding the College Democrats Letter

Exhibit 25. Witness One, Student A, Student C and Student G's July 23, 2020 Chat Messages Regarding Alex Morse's Conduct

VII. List of Appendices

Appendix A. University Policy on Consensual Relationships between Faculty and Students

Appendix B. University Principles of Employee Conduct

Appendix C. University Policy Against Discrimination, Harassment, and Related Interpersonal Violence

* * *

Exhibit 1

To: Max Clermont
Morse
From: [REDACTED]
Sent: Thur 8/6/2020 8:41:54 AM (UTC-04:00)
Subject: Notice from College Dems

Good morning,

This email is to inform you that Alex Morse is no longer welcome at College Democrats of Massachusetts, UMass Amherst Democrats, and Amherst College Democrats events.

Numerous incidents over the course of several years have shown that it is no longer appropriate to encourage interaction between College Democrats and Alex Morse. The behaviors in question include, but may not be limited to the following:

- Having his Tinder and Grindr age minimums set to 18 and regularly matching with college students, including MA College Democrats leaders, UMass Amherst Democrats, and other students in Western Massachusetts and elsewhere,
- Using College Democrats events to meet college-aged students and add them on Instagram, adding them to his “Close Friends” story and DMing them, both of which have made young college students uncomfortable, and
- Having sexual contact with college students, including at UMass Amherst, where he teaches, and the greater Five College Consortium.

These behaviors represent a trend that has continued for years and has been well-known and widely discussed amongst College Democrats in Western Massachusetts. The power dynamics represented in these situations are dangerous and inappropriate. We have heard first-hand accounts of students having sexual encounters with Morse. At least one of these students did so before finding out that he is a Mayor and a Lecturer at UMass Amherst, and they felt uncomfortable after uncovering this information. We have heard *countless* stories of Morse adding students to his “Close Friends Story” and Direct Messaging members of College Democrats on Instagram in a way that makes these students feel pressured to respond due to his status. Even if these scenarios are mutually consensual, the pattern of Morse using his platform and taking advantage of his position of power for romantic or sexual gain, specifically toward young students, is unacceptable.

Alex Morse should know that as an elected official, a high-profile candidate, and a lecturer at a large public university, he holds a position of power over many young people. Many young people around the state and around the country, especially those involved in College Democrats, view Morse as a role model, which renders it unacceptable for Morse to routinely make sexual or romantic advances, whether implicitly or explicitly. His actions have disturbed many members of our community, and as a result, some of the students who have been personally affected by Morse’s actions have asked our organizations to refrain from working with him in the future.

Our organizations feel that it is incumbent upon us to call out inappropriate behavior regardless of party affiliation or political ideology. Morse will no longer be welcome at our events and our organizations will be completely disaffiliating from Morse.

We ask that he immediately cease the behavior described above.

Signed,

College Democrats of Massachusetts
UMass Amherst Democrats
Amherst College Democrats

Exhibit 2

5:51

LTE



Dear Mayor Morse,

We wanted to get in touch with you about the situation that has unfolded over the past few weeks. We wrote the statement attached below to explain to our members our involvement with the letter that CDMA, U Dems, and the Amherst College Dems sent to you.

We want to tell you that we are deeply sorry for the distress that the public reaction to the letter must have caused you. As we said in our statement below, we did not intend for the contents of the letter to become public. However, we should have realized that the language of the letter was careless and played into homophobic stereotypes that have been used to oppress gay men in politics. We understand that no apology of ours can make up for the homophobic attacks you have suffered as a result of our actions; nonetheless, we wish to apologize.

We wish you the best of luck in your campaign.

Sincerely,
The UMass Democrats executive

19

58

473



Exhibit 3



Explore

Settings

Tweet



Alex Morse @AlexBMorse

My statement on the last 48 hours.



9:31 PM · Aug 9, 2020 · Twitter Web App

492 Retweets 212 Quote Tweets 3.4K Likes



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I announced my candidacy for Congress because I believed our country needed leadership that understood the urgency of this moment. I believed that the voters of the First Congressional District deserved a member of Congress who would put their interests before those of wealthy and influential donors. I believed that the health of our democracy relied on envisioning a new kind of politics – a politics of lifting up and empowering ordinary people.

I still believe these things. If anything, my time as a candidate has only deepened my conviction that people are looking for a politics that is more generous, more open, and more just. I've heard stories from people in every corner of this district that I'll carry with me for the rest of my life.

Our campaign is fueled by the hard work and dedication of my amazing staff and volunteers and the contributions of small grassroots donors. Our campaign is also lifted up by the support of progressive organizations that helped take our efforts to new heights. I remain committed to their missions, but also understand the toll that recent events are taking on them and their supporters.

Over the weekend, the Daily Collegian published a story that alleged that I abused my power in having consensual sexual encounters with college students, and that I made other college students feel uncomfortable by conversing with them on social media.

I want to be very clear about this. I have never, in my entire life, had a non-consensual sexual encounter with anyone. I have never used my position of power as Mayor and UMass lecturer for romantic or sexual gain, or to take advantage of students. I have never violated UMass policy. Any claim to the contrary is false. As I've acknowledged, I have had consensual relationships with other men, including students enrolled at local universities that I've met using dating apps.

While I am confident that a full investigation into these matters will clear my name completely of any unethical conduct, I also recognize that some students felt uncomfortable with interactions they had with me. I am sorry for that. This is unacceptable behavior for anyone with institutional power. Further, for the past few years, there has been an important conversation underway in this country about power dynamics in romantic or sexual relationships. This conversation is long overdue — and while I never used my power in a problematic way, I understand why the issue would be raised. My position and the power that comes with it follow me in every area of my life, and I understand now, in a deeper way, the importance of being sensitive to that fact. I am human. I'm imperfect. But I know who I am and what I stand for.

It's unfortunate that these allegations came three weeks before the primary, because there isn't enough time for UMass to conduct an independent review before the people of this district vote



on September 1. While I fully believe that I will be cleared after the UMass review is complete, I also believe the students have the right to be heard and for their concerns to be addressed. I am pledging my full support and participation in that process. I stand ready to meet with the University, the students, or any other people affiliated with the review process.

To all my supporters who've reached out over these past few days, encouraging me to stick this out, I want you to know I hear you. Your support means the world to me. And to the many members of the queer community that have reached out to me in recent days, it's clear that many of you feel that these recent events, and the language used in response, aren't just an attack on me, but on all of us. You're genuinely outraged, as I am, by the invocation of age-old anti-gay stereotypes. You have reminded me that we've come too far to turn back. I want my freedom, and I want you to have yours, too.

I continue this campaign mindful of the fact that my personal life — and my consensual sexual activity — will be subject to scrutiny and fixation that are all too familiar to other members of the LGBTQ community. I am also mindful of the fact that there are people holding onto power today who themselves have acted in dishonorable ways in their personal lives. I say this not to shirk responsibility for having made anyone uncomfortable. I am simply highlighting the fact that I am being held to a different standard, one deeply connected to a history of surveilling the sex lives of people like me.

Too often, elections aren't about issues and ideas; they're about personal destruction. As I move forward, I vow to keep speaking up for the cause on which this campaign was built: the cause of building a true and just democracy in this country. Because, long after this story has faded and the election cycle is behind us, working people in this district and around the country still need a government that looks out for them. That's who I got in this race for, and that's who I will keep fighting for. This was never going to be an easy path. Moving forward, I commit to continuing the debate and focusing on the issues that matter most to voters in the district.

While I am staying in the race, I also fully understand that some of my supporters and endorsers have legitimate concerns about these allegations, and I understand if they feel they need to rescind their support. I am officially releasing any endorsers who feel it is in their interests to no longer support my campaign. For my part, I intend to take our campaign's progressive, inclusive message to the voters of the First District. I look forward to seeing Congressman Neal on the debate stage next week.

Exhibit 4

To: [REDACTED]
From: [REDACTED]
Sent: Thur 8/6/2020 5:02:39 PM (UTC-04:00)
Subject: Re: Draft Statement for chapters

Sounds good to me. Do we have a plan for the inevitable questions chapter presidents will ask?
[REDACTED]

On Thu, Aug 6, 2020 at 8:46 AM [REDACTED] wrote:

Hi all,

This is the statement that Mass Dems' lawyer wrote for us and recommended we share with chapters:

"The boards of college Democrats of Massachusetts, UMass Amherst Democrats, and Amherst College Democrats have voted to notify Mayor Alex Morse and his campaign that he is no longer welcome at any of their events. This action was taken at the request of student members of the organizations. It is not based on his ideology or any current or past political contest. It is based on his past interactions with these students."

I don't think we should change anything since a lawyer wrote it and I trust him, but please let me know what your thoughts are. [REDACTED] and I were thinking we should send it out tomorrow morning, just in case somehow our letters gets leaked—we don't want chapter presidents to hear about this from someone else first. Please respond and let me know what you think, and I'm happy to chat on the phone with anyone about this!

[REDACTED]

From: [REDACTED]
Sent: Fri 8/7/2020 10:30:55 AM (UTC-04:00)
Subject: Important Notice about the Morse Campaign

Hi everyone,

The boards of College Democrats of Massachusetts, UMass Amherst Democrats, and Amherst College Democrats have voted to notify Mayor Alex Morse and his campaign that he is no longer welcome at any of our events. This action was taken at the request of student members of the organizations. It is not based on his ideology or any current or past political contest. It is based on his past interactions with these students.

On advice of legal counsel, we cannot share additional information about those effected, but we are happy to chat with anyone about this—just be aware that the answers we can provide to your questions will be incredibly limited.

Signed,

College Democrats of Massachusetts
UMass Amherst Democrats
Amherst College Democrats

Exhibit 5

To: Alex Morse [REDACTED]
From: [REDACTED]
Sent: Wed 8/28/2019 11:02:52 AM (UTC-04:00)
Subject: Re: INVITE: College Dems Kickoff

Hi Alex,
Just wanted to follow up with more information about our Western Regional Kickoff—if it works for you, 3:00 would be a great time for the mayor's panel. It's going to be held at HCC in Ketterage room 301, and you can check out the Facebook event here: [REDACTED]. Let me know if you think of any questions!

[REDACTED]

On Jul 25, 2019, at 10:09 AM, Alex Morse <[REDACTED]> wrote:

Hey [REDACTED] - thanks so much for the note, I appreciate it and I look forward to having you helping out!

Yes, 10/5 should work for me. I'm fine with a panel or speaking, just let me know how the day is coming together as time progresses so I can plan for a specific time.

Talk soon!

Alex

On Thu, Jul 25, 2019 at 9:32 AM [REDACTED] wrote:

Dear Mayor Morse,

Congratulations on your new campaign! I (and basically everyone else I know) was absolutely thrilled to hear that you were running, and I look forward to volunteering for your campaign when I return to Amherst in the Fall.

College Democrats of Massachusetts is hosting our annual Western Regional Kickoff at Holyoke Community College on October 5th, and we would be absolutely honored if you could attend. We were hoping to put together a panel of Pioneer Valley Mayors, so it would be a great chance to talk about all of the incredible things you've accomplished during your tenure as Mayor. As of now, we're also inviting David Narkewicz and Nicole LaChapelle, so hopefully we can make a panel work if everyone's availabilities line up. Either way, we would love to hear you speak.

The event runs from 11am to 4pm, and we're flexible about timing of our speakers. If you're interested in coming, just let us know what times work best for you and we'll make it work! The event will have students from HCC and all of the 5 colleges, and I estimate that turnout will be around forty students. Let me know if I can answer any questions about the event, and I look forward to hearing back.

Best,

[REDACTED]

Exhibit 6

TOP CATEGORIES

- [Main Page](#)
- [Manic Monday](#)
- [Springfield](#)
- [Holyoke](#)
- [casinos](#)
- [Culture Vulture](#)
- [Longmeadow](#)
- [West Springfield](#)
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- [Massachusetts House of Representatives](#)
- [media](#)
- [Valley Election Center](#)

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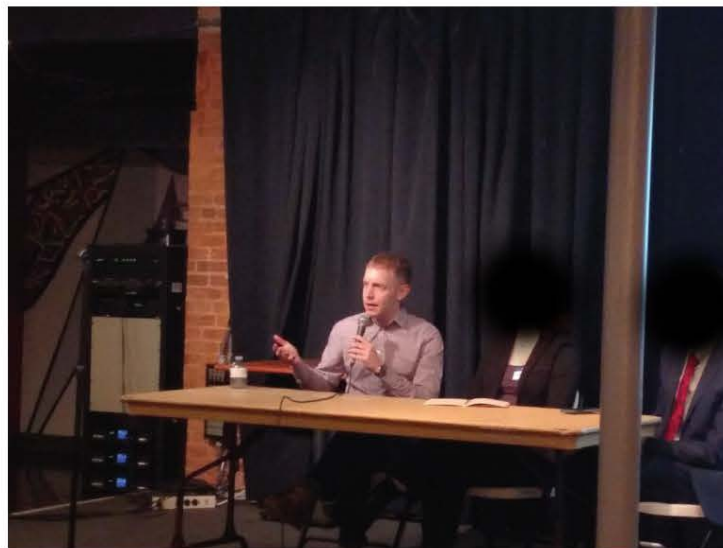
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- [Holyoke City Hall](#)
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- [US Senator Ed Markey](#)
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Has Morse Begun to Telegraph His next Move?...

APR 15, 2019 by WMASSP&I in HOLYOKE



Mayor Alex Morse with College Dems Officials on April 6 in Worcester. (WMassP&I)

WORCESTER—On a seasonably brisk spring day, College Democrats had assembled in the basement of Clark University’s student center for their annual convention. There was drama, but that did not concern their guests, including one who was a few years out of college himself, Holyoke Mayor Alex Morse.

College Dems events were familiar territory for Morse. He was among several young electeds who spoke, including the area’s rep **David LeBoeuf** and Boston City Councilor **Michelle Wu**. This visit came amid rising chatter here, and back in the 413, about his interest in higher office such as the seat held by US Representative Richard Neal.

Morse’s **recently reported lunch** with Tom Steyer got headlines. The California hedge fund manager turned impeachment activist, has been pressing Neal to obtain Donald Trump’s taxes.

But that is not the only sign Morse may want a promotion. Four sources familiar with the matter told WMassP&I they either spoke to Morse about running for Congress or had heard of such discussions.

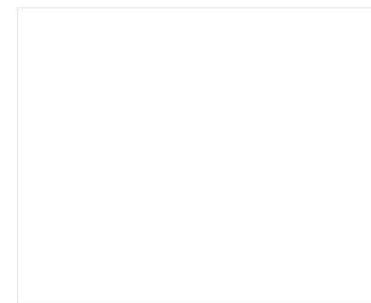
Morse hasn’t denied conversations have happened, but he downplayed them.

“Right now, I’m just focused on being mayor,” he said Thursday when asked about a Congressional bid.

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Western Mass Politics & Insight Retweeted

Matt DeRienzo @mattderienzo

Over the years I've competed with the @haffordcourant, recruited talent away from them (something that's accelerated since I left CT media). Connecticut, in every sense — democracy, economy, will decline as its powerful accountability journalism declines. <https://twitter.com/BrucePutterman/status/1335009049188982795>

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In a follow up message to WMassP&I, he added, "I love my job and I'm very happy working for the people of Holyoke. He said talking to people is part of being mayor. "While many constituents have reached out to ask about my future plans, I'm focused on my current job and haven't made many decisions beyond that.

The 1st Congressional district includes virtually all of Berkshire and Hampden counties, the western fringes of Franklin and Hampshire counties, and southwestern Worcester County.

Current Massachusetts Districts. The 1st is in brown/red. (via wikipedia)

In 2011 Morse ousted then-Mayor Elaine Pluta, an inoffensive but vanilla Paper City political mainstay. Since then, he turned back three challengers. Now, he may be ready to make a move.

But where would Morse go? He has already said **he would not seek Holyoke's like-y-to-open-State Senate seat**. House consideration is not shocking. Along with Longmeadow State Senator Eric Lesser, Morse is an obvious maybe-run when Nease retires.

Morse has been in office three years longer than Lesser, though. Could he be getting antsy? While critics have howled about Morse's ambition for years, four terms in, it would be entirely fair to finally act on it now.

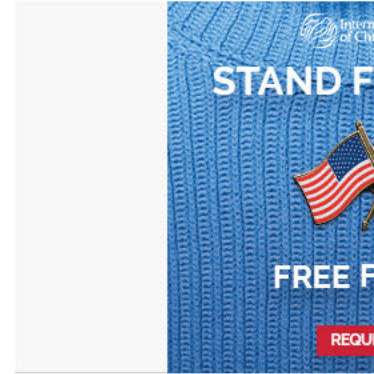
Plus, with Holyoke instituting four-year mayoral terms in 2017, he has the luxury of considering options without an imminent reelection.

"I think the four-year term has lent itself to natural conversations and questions both from constituents and stakeholders, you know, 'Hey Alex what do you plan to do?' he told WMassP&I.

The College Dems of Massachusetts have indeed welcomed Morse several times over the years, most recently in 2017 at Smith College. While the group lacks a large presence in Nease's district itself, it could be an organizational asset no matter what Morse's next step is.

Morse's past success has turned on changing the electorate. Big Gidden, a former Morse mayor and campaign aide now living in New York, wasn't sure the youth vote itself surged in Morse's elections. But groups that typically sit out municipal races did surge during his races.

Could Washington be bringing on a seven-year itch? (created via AP & wikipedia images)



MEDIA
Printing Farmed out, Now Courant's Whole Hartford Footprint Is Virtual...
0 COMMENTS

HOLYOKE
Analysis: Holyoke Rumor Mills Churn out Possible Morse Successors...
0 COMMENTS

HOLYOKE
Morse to Bow out as Holyoke Mayor, Drawing Plaudits for His Service...
0 COMMENTS

"The more important point about young people, I think, is the way that enthusiasm among young people translates into an effective grassroots campaign," Giddens wrote in an email. He recalled how many volunteers were in their 20s and saw themselves in Morse, who turned 30 in January.

"That's an ingredient no campaign can do without," Giddens continued. "You've got to give people a reason to leave their homes and go talk to voters about you. Alex has a way found a way to do that."

Morse made no overt references to higher office speaking to College Democrats last Saturday in Worcester. But the rumors were swirling among attendees as he answered questions from his hosts. His invitation originated out of the Western Massachusetts office of the College Democrats and its LGBT caucus.

He was comfortable on stage and cracked a joke when asked about running for office as a gay 22-year-old college graduate. "You got a second-tier gay mayor," he said, referencing South Bend, Indiana mayor and presidential aspirant [Peter Buttigieg](#).

Mayor Peter Buttigieg (via wikipedia)

More seriously, Morse described his path to running for mayor his junior year at Brown University. This was just after interning for Providence Mayor David Cicilline, now a Rhode Island congressman. As a first-time candidate, he said his youth came up the most, pointing to Pata's slogan, "Experience Matters" as proof.

"I felt like my age was more of an issue for me than my identity as a gay man," he said.

The mayor did raise several issues that telegraphed his progressive bona fides, however.

For example, he talked up his position on issues ranging from pot to climate change.

Morse endorsed the Green New Deal—he attended [Senator Ed Markey's Northampton presentation](#) on it. He also discussed Horry's efforts to limit its carbon emissions—the city he proudly produces its own hydroelectric power. The city also saw the shutdown of a coal-fired power plant—a major taxpayer—replaced, in part, by a solar farm.

The mayor noted his support for Medicare for All, spotlighting the mayor's group he cofounded on the issue. While focused on state action, it has an eye for national movement on single-payer, too.

Morse concealed ambition behind practicalities, however. Municipally-produced hydrofacilities low-cost green energy. A single-payer health system, Morse argued, would relieve pressure on municipal employee health costs.

Arguably, these could peel off voters from Nease's effort. But otherwise the gap between them is not massive—at least in 1st district terms. Voters there are fiercely Democratic, but not stridently ideological. Moreover, Representatives [Alexandria Ocasio-Cortez](#) and [Ayanna Pressley](#) won

partly because of its demographics
were shifting under incumbents' feet.
In the 413, that's far less true.

Critics don't like to admit it, but US Rep Richard Neal
cannot be easily felled. (WMassPoli)

Morse's unch with Steyer came before Nea, as **Ways & Means chair**,
formally requested Trump's taxes on April 3. Politico's report indicates it
happened around Steyer's rally in Agawam last month. But **Steyer disclosed
plans** to fund a primary challenger even then.

Steyer's pro-impeachment group did not return a request for comment on
the provenance of his unch with Morse. However it happened, former and
current Morse aides attended Steyer's event at Chez Josef.

Steyer and Morse told Politico they discussed impeachment and climate
change, a Steyer cause.

Since Steyer's visit, Nea has requested the returns, reiterated his demand
this week after officials balked and **demanding their production** by April 23.
The implication is he will go to court next. Steyer has praised Nea's moves,
but his board also cautions the congressman to make the returns public.
Nea may not be able to do that unilaterally, but he could forward them to
the full House which could.

Whatever Steyer does, Nea would not be easy to beat. He is a prodigious
fundraiser with deep roots in the district. House leadership would likely
move to discourage monetary support for Morse, who has drawn on political
and Brown connections for past campaigns.

There is some attraction
to challenging Nea now,
however. Even so
could raise his profile for a
future run. Winning would
avoid a titanic battle with
Lesser, 34. While Morse
wouldn't face the same
institutional pushback in
an open race, Lesser, **who
worked for former
President Barack Obama**,
can access considerable
resources. The Senator

Mayor Morse and Senator Eric Lesser at a climate change event in Springfield
last Thursday. (WMassPoli)

so represents far more of the 1st District than Morse does as Holyoke's
mayor.

Whomever Morse may run against—if anyone and for whatever office—he
may ultimately rely on ideology rather than telling a story.

"In many respects, politics in Holyoke are a microcosm of politics statewide
and nationally, Gidden said. "The questions there are as old as the country
itself. How do we build a true democracy – one that we can all meaningfully
participate in, one in which the dignity of all people is respected?"

While Morse's tenure is not without controversy or mistakes—as Morse
himself admits—he would almost certainly tie together his own story and
Holyoke's.

Riffing about his mayoral runs at the Coe Democrats Convention, Morse
observed that many Brown classmates did not return to the places they grew
up in. He wanted to return to Holyoke. "It's the place that made me who I am
and gave me the opportunities to go to college," he said.

"This reflects, I think, his basic attitude about the people he serves: that

when people are given access, and the tools to thrive, they can transform their communities for the better, Glidden said. "And moreover, I think it illustrates his basic idealism, and audaciousness.

Like many young politicians, Morse became someone to watch the moment he won. Now, after serving eight years in a region with limited upward political mobility, he seems to be assessing his situation. Whatever he does, expect Morse to follow a script that has served him well before.

Tweet

Tagged with: [Alex Morse](#), [Billy Glidden](#), [Eric Lesser](#), [Mass. College Dems](#), [Pete Buttigieg](#), [Richard Neal](#), [Tom Steyer](#)


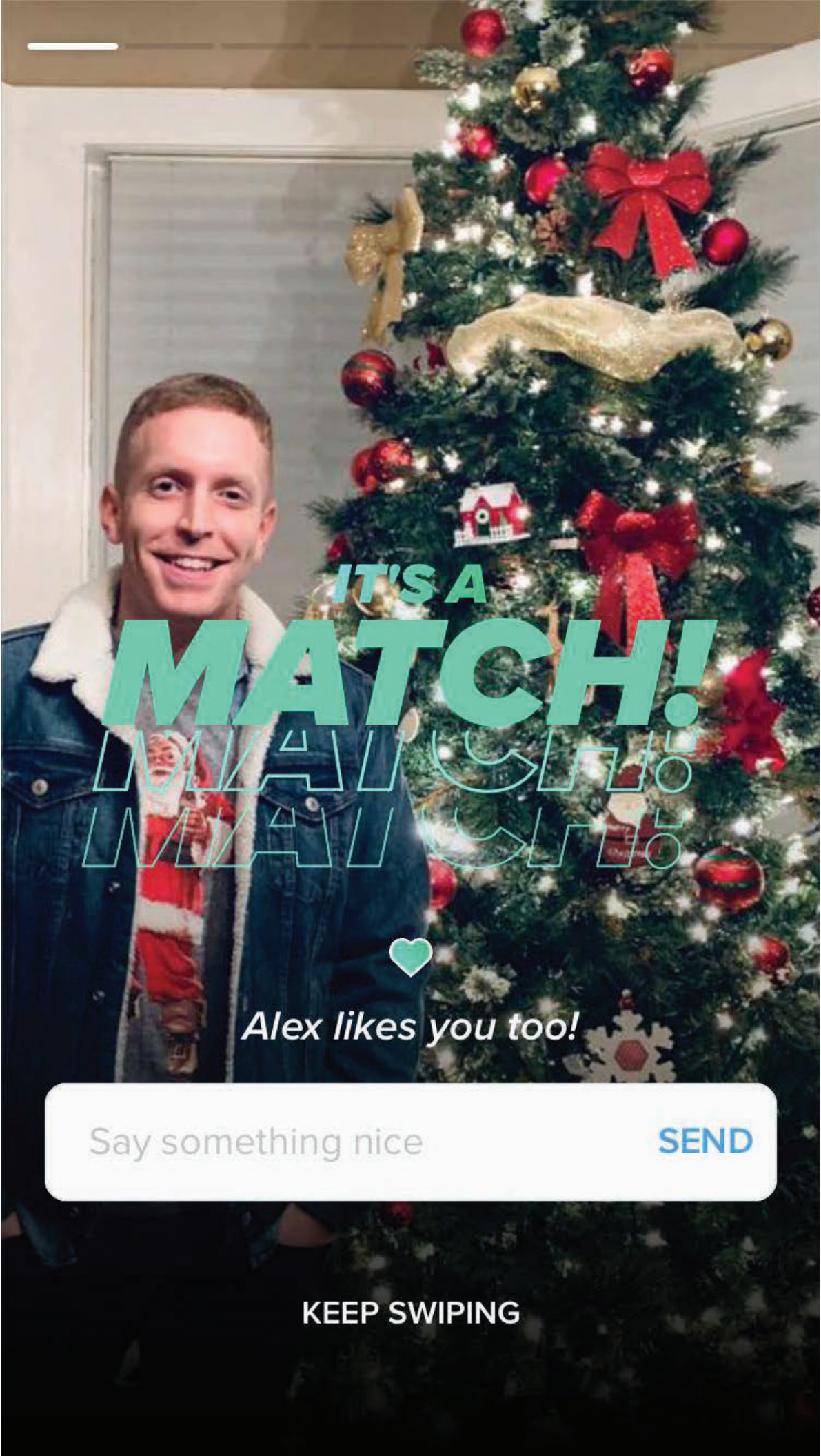
<	>	ABOUT THE AUTHOR	wmasspi
			



Exhibit 7



IT'S A
MATCH!
WAI WAI
WAI WAI



Alex likes you too!

Say something nice SEND

KEEP SWIPING

Exhibit 8

To: [REDACTED]
From: Alex Morse [REDACTED]
Sent: Thur 9/19/2019 9:42:41 AM (UTC-04:00)
Subject: Re: Campaign opportunities for college students

Hi [REDACTED] - great to see you as well! Thank you for reaching out on this. I'm going to have Gina or Max on my team be in touch with you about opportunities and such.

Talk soon!

Alex

On Mon, Sep 16, 2019 at 11:42 AM [REDACTED] wrote:

Hi Mayor Morse,

It was great to see you in Springfield on Saturday! As the UMass Dems are getting into the swing of things, we're trying to find opportunities for members in the area. We were wondering if your campaign had any programs or positions that we should tell our members about! Our first meeting is this Wednesday so we'd hope to share any information soon!

Thanks and hope to chat soon!

[REDACTED]

Exhibit 9

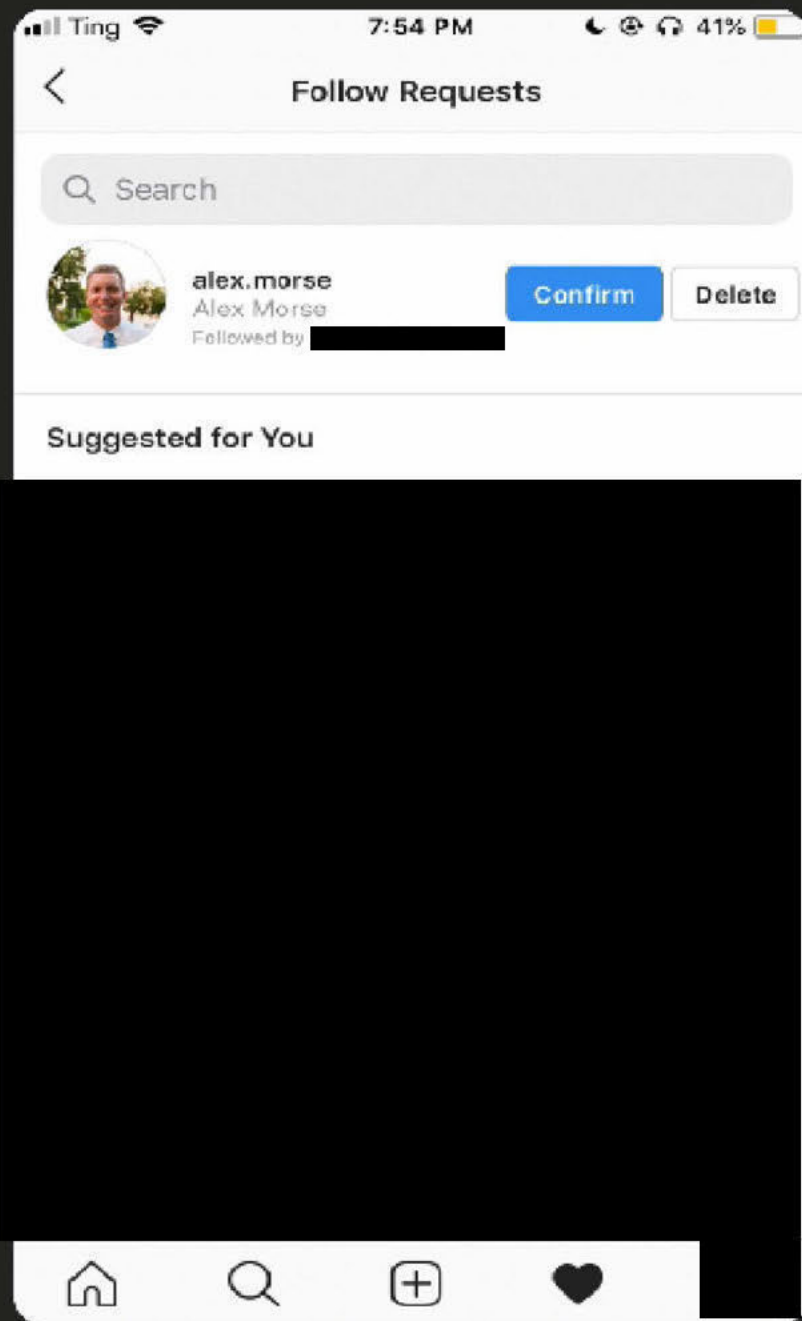
To: [REDACTED]

Details

Message with [REDACTED]
10/6/19, 10:06 PM

Lol hey it's [REDACTED] from Dems

Heard the Morse force is uhh tryna
get to u too



To: [REDACTED]

Details



Why does a progressive gotta be so creepy 🤔

its so sad

i was gonna send him an email asking to work for his campaign in some fashion

but hes so creepy

how did he even find me lmao

Ik that's soo fucking weird probs found u from stalking teens in college Dems

Like it sucks cause Neal sucks and I would love to help defeat him (don't to [REDACTED] lol he's in love with Neal) but Morse just doesn't deserve more power!!

right

I assume you've been caught up on him trying to trap me?

trap you!?

i thought it was just innocent talk in tinder

Well then he followed me on insta which I wonder if that's how he found u

must be

And slid into my DMs after the event Friday

To: [REDACTED]

Details

And slid into my DMs after the event Friday

but still

why not linkedin or smth

damn

aaaaahhhhhh

I've been in a convo with him for the past day and a half cause I'm not tryna burn bridges and low key think it's funny but like he is

PROBLEMATIC

thats how i feel to

like can i use this just to get to know people

So like I guarantee he's gonna hit you up and probably try and smash

Or he'll offer a really nice campaign internship and then trap YOU lmao

okay hear me out

i take that

get some weird phone recordings

and have a free bookdeal

HAHAHA are u not straight tho

i am

To: [Redacted]

Details

Not overt but it's very clear he's not talking to me for no reason



Like read that message

Also don't mind me totally leading him on

DEFINITELY accept the follow cause why not

youre so leading him on lmaoo

Exhibit 10

2:07

5G E



alex.morse



October 08, 7:35 AM



Hey man, it was nice meeting you on Saturday!

October 08, 1:42 PM

Great meeting you as well! I'm thrilled for your candidacy



October 08, 6:13 PM



Aw, thank you! I appreciate that. Would love to have you involved in anyway. I forget, you're at umass?

October 08, 9:46 PM

Yes at umass! My friend [REDACTED] and I'd love to get involved

Great.



There will be many ways to be involved

Awesome!



5:00



Message...



Exhibit 11

Messages - [redacted]



[redacted]
[redacted]

[redacted]

[redacted]
[redacted]

[redacted]

10/8/19, 2:25 PM

Alex DM'd [redacted] Witness 6 from kickoff too..

[redacted]
Who is that and what did Alex say

A [redacted] student at umass

I just asked I'll lyk

Verizon LTE 2:27 PM 66%
alex.morse Active 45m ago

I guess that doesn't help you get to know me at all lol

Nope. All I know is you're from [redacted] and like to moderate panels. And a few other things

2:27 PM

Haha like what

Message...



[redacted]
Ok this is getting to far

Hasn't gotten too far yet

I'm sure his next message will be too far

Exhibit 12

**alex.morse**

Active now



Aw that's nice. How was that? I had an event to go to last night to speak, then had a wine tasting party at a friends house. Now I'm in north Adams about to march in a parade.



5:30 PM

Oh cool, sounds fun. What parade? And it was good! We had a party for her and she had a great time

That's so nice. Your mom must have been very thankful and appreciative.

The parade is called the fall foliage parade

I've never been before. It was nice. It was a little chilly lol



Message...





alex.morse

Active 17m ago



Yesterday, 11:14 PM

Yup haha I know you're the mayor of Holyoke and your stances on police brutality and environment issues

7:07 AM



You know more than that at this point.



Message...



I

Hey

Hi

Q

W

E

R

T

Y

U

I

O

P

A

S

D

F

G

H

J

K

L



Z

X

C

V

B

N

M



123



space

return

Done

11 of 11



Yes I love it. Where are you from

I'm from [REDACTED]. It's like 15 minutes from [REDACTED]



Oh okay cool. Think I've driven through lol

Yesterday, 5:55 PM

Oh cool haha, id ask where you're from but I already know

Yesterday, 9:14 PM

Good call lol. I think after moderating two of my speaking appearances you know a couple things about me lol



Finally home





alex.morse

Active 49m ago



I guess that doesn't help you get to know me at all lol

Nope. All I know is you're from [REDACTED] and like to moderate panels. And a few other things



2:27 PM

Haha like what



Message...



I

Hey

I'm

Q

W

E

R

T

Y

U

I

O

P

A

S

D

F

G

H

J

K

L



Z

X

C

V

B

N

M



123



space

return

Exhibit 13



10/5/19, 9:37 PM

Umm

ALEX MORSE

dm'd me on insta

I haven't opened it

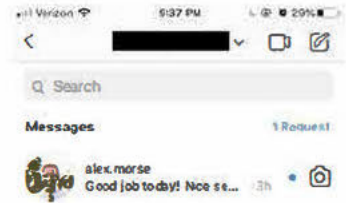
[Redacted]

No

Yes

[Redacted]

NO WHAT DOES IT SAY



This is all I see

[Redacted]

HOLY FUCK

I FUCKING KNOW

WTF IS WRONG WITH HIM

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

10/6/19, 10:07 AM

OPEN IT

Emphasized "OPEN IT "

Good job today! Nice seeing you again. I enjoyed the panel.

Disliked "Good job today! Nice seeing you again. I enjoyed the panel."

Say nice seeing you too 😊

[REDACTED]

You have to reply with something dirty

My response: Thank you! Good to see you too.

[REDACTED]

Flirty^***

[REDACTED]

Not dirty omfg

Nah

[REDACTED]

Disliked "Nah"

[REDACTED]

Disliked "Nah"

Someone's gotta be mature

[REDACTED]

[REDACTED] the entire pregame was hanging on for dear life

There's still time to add an emoji tho

[REDACTED]

Emoji

[REDACTED]

Do it



Yeah?

[REDACTED]

Removed an exclamation from "Yeah?"

[REDACTED]

[REDACTED]

[REDACTED]

I'm still deceased from this

Yeah [REDACTED] you should honestly hit him up like I'm kind of joking but also that would low key be cute

Omg

Like low key

Laughed at "Yeah [REDACTED] you should honestly hit him up like I'm kind of joking but also that would low key be cute "

[REDACTED] who should I hit up

First gent of Holyoke

Alex

Um why

Why not

Cause I would only be doing it for political reasons

You don't think he's attractive?

I'm only somewhat attracted to him for the clout

Hm

Oh you're kidding I totally get it now hahahahaha

No I'm not

I'm literally not

Ew stop he's like 40

Emphasized "I'm literally not"

30

He's 30



Okay you're right I shouldn't be encouraging this

He's only an entire decade older than you [redacted] lmao

Emphasized "Okay you're right I shouldn't be encouraging this "

I just saying I wouldn't blame you

Loved "He's only an entire decade older than you [redacted] lmao"

He'd give you a campaign job

I'm just gonna lead him on and then when I run for something ask for his advice support and money

Laughed at "I'm just gonna lead him on and then when I run for something ask for his advice support and money"

Exhibit 14

Messages -

Ask him about his campaign

Be like "that sounds so nice"

"And how is the campaign going?"

I'll ask if he had campaign volunteers there

I'm gonna give it 24 hours until he asks you to meet up

Omg

Lol

He's thirsty

Everyone is concerned

This is mildly concerning

But also deeply amusing and I want to see how far this goes

Emphasized "This is mildly concerning"

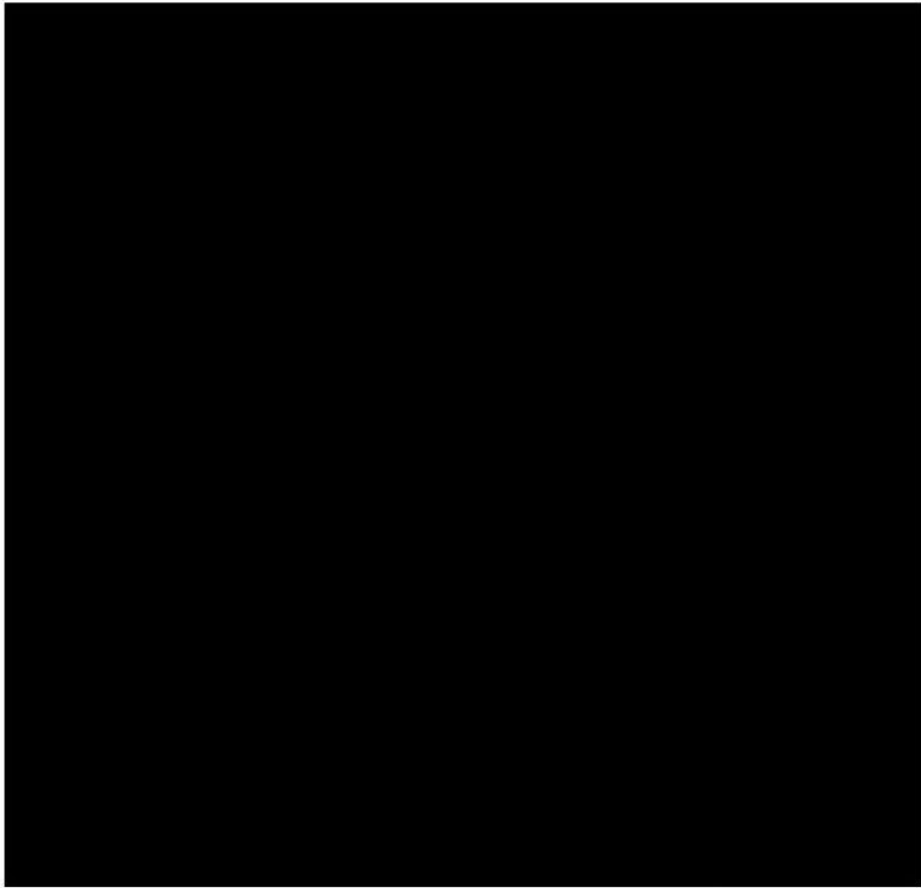
who is everyone

Like everyone

Across America

And Student A

Exhibit 15



11/6/19, 1:36 PM

[REDACTED]

Okay I looked it up and umass officially has a ban on professor-student relationships

[REDACTED]

As of April 2018

[REDACTED]

Meaning Alex Morse could get fired

Yes

[REDACTED]

Okay I wasn't sure whether we were all aware that this is not allowed even though they're not his students

Exhibit 16

[REDACTED]

10/22/19, 8:27 AM

[REDACTED]
Attachment stored in iCloud:
IMG_2171.PNG (Image)

[REDACTED]
This is so freaking creepy

[REDACTED]
Wait Wtaf

10/22/19, 10:59 AM

Emphasized "Wait Wtaf"

10/24/19, 10:21 PM

[REDACTED]
ALEX MORSE FOLLOWED Student G ON INSTA

[REDACTED]
NOT MY SON

[REDACTED]
NOOO

Lol

Wait Student G straight right

[REDACTED]
No idea

You haven't... asked him this

[REDACTED]
I'm seeing a lot of politics and some sports

[REDACTED]
No but [REDACTED] and I are best friends now

[REDACTED]
I love him he's a sweetheart

Exhibit 17

To: [REDACTED]

Details

And your pic doesn't look like you either lmao

Wtafffff

This is why I'm a Neal Stan

lol

based centrist

Fight me

shouldnt u love morse hes gay

Neal will give me an internship,
Morse will give me other things

well u have neal as a teacher so

I had Morse last semester

There's other tea!

Someone saw him giving you like a
look when he walked in



bruhhhhhhhh



Do you want me to try to find

To: [REDACTED]

Details



Do you want me to try to find another progressive dem to work for lmao

ill think

i could be a snake and use it to my advantage but theres only a matter of time b4 someone like his gets metooed

Like I'm not even kidding there are so many young gays at UMass who he's found

I found him my freshman year 🦴

on tinder you mean?

Yeah

ew

Like he hooks up with freshman

It's creepy af



This could sink his campaign

He matched with [Witness One](#) like a few

To: [REDACTED]

Details

He matched with **Witness One** like a few weeks back

highkey

so wack

Lowkey bitter he doesn't follow me on insta but 🍷

lmaooo

He sent **Witness One** like three messages in a row tonight

oml

pix?



To: [Redacted]

Details

The parade is called the fall foliage parade

I've never been before. It was nice. It was a little chilly lol



Message...



whyyyyy



Me giving this story to politico

maybe hes friendly?

if i knew he was straight i might woudnt think twice

HA HA

maybe this is latent homophobia

This is after they matched on tinder soooo

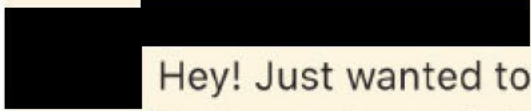
Don't if you tell him he'll drop out of the race

Exhibit 18

9:38



Sun, 1:41 PM



Hey! Just wanted to apologize for the Dems gc. I wasn't trying to minimize your work in MA-01 in any way, just making a joke cause I live in [REDACTED] on the [REDACTED] line



9:38



Sun, 1:51 PM



Hey! There's a lot going on in the groupchat and I just wanted to let you know we weren't ignoring you and we value your voice and hope you'll stay involved, people were just saying a lot at the same time



9:37



Sun, 2:10 PM

Hey. My name is [REDACTED] and I'm in the udeMs eboard. Sorry for brushing your comments about Alex Morse but we've had some situations with his campaign. If you'd like to talk on the phone I can explain to you what happened. Either way hope you stay involved in udeMs, we try to be welcoming but kinda freaked out when you mentioned him



i've known him for over 10 years and have never had any issues, i've only heard from our campaign that we have tried to reach out for him to come speak at Dems and were never gotten back to. i'm only trying to share opportunities for other students multiple times but if there was an issue with him and a board member that shouldn't effect the entire group, and isn't welcoming.



I'm glad that you haven't personally had an issue with him, but members of our group have, and it's not right to dismiss that. Still happy to clarify on the phone if you'd like



Send Message...



Exhibit 19

8/2/20

██████████
Please no

1:34:30 PM ██████████

██████████
Nobody volunteer for Morse

1:34:36 PM EDT

██████████
Bro I need this to come out I'm literally dying

1:34:54 PM EDT

██████████
This is why it sucks

1:35:04 PM EDT

Same

1:36:46 PM EDT ✓

██████████
The Morse girl left

1:41:06 PM EDT

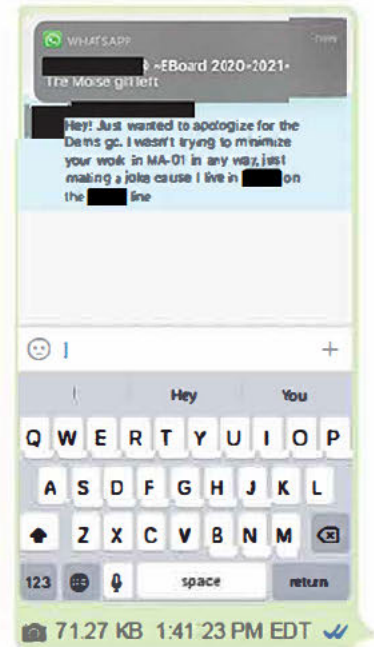
██████████
I feel bad

1:41:09 PM EDT

██████████
Lmao is that who left??

1:41:21 PM EDT

8/2/20



I think it's important for that gc to have conversation

1:41:30 PM EDT

Sent that to her

1:41:32 PM EDT ✓

Agreed

1:41:36 PM EDT ✓

Feel free to send her apology texts and don't mention morse by name but try to get her back in

1:42:22 PM EDT ✓

Same

1:42:25 PM EDT

You guys should pose conversation questions! They don't have to be about politics obvi

1:42:39 PM EDT

Exhibit 20

**alex.morse**

Restricted Account



Hey _____, I hope you're doing well and enjoying your summer so far. I wanted to reach out to you directly and address some feedback I've received recently. I was told that I may have made you uncomfortable by communicating with you via Instagram message. I want to sincerely apologize for making you feel uncomfortable. I've reread our conversations a few times, and my intention was to engage in friendly communication. I am happy to talk with you over the phone and discuss more if you would like. I'm happy to send along my number and find a time. Have a

You have restricted alex.morse

They can't see when you're online or when you've read their messages.

Block**Delete****Unrestrict**

Exhibit 21

6/28/20

love that

6:44:04 PM EDT

Next week it is

6:44:07 PM EDT

Can I just expose Alex Morse on Twitter

10:17:11 PM EDT

Because I'm legit done with him

10:17:18 PM EDT

I'm definitely not gonna say no lol I've been squirming every time someone makes him appear on my feed

10:17:43 PM EDT

It legit makes me wanna throw up

10:18:21 PM EDT

I have to stop myself from saying something every time I see it

10:18:54 PM EDT

Has there been any polling in the district?

10:18:58 PM EDT

Idk but his campaign is awful and he has no money so he's def gonna lose

10:19:24 PM EDT

6/28/20

That means something the challengers that win always seem to have a lot.

10:20:16 PM EDT

The language he uses is so arrogant and entitled too it's like how can you know you've behaved this way and also act so full of yourself

10:22:18 PM EDT

I want to cancel him so bad

10:22:43 PM EDT

When he compares himself to AOC. Yes you a white cis man who went to brown are just like her

10:23:15 PM EDT

^

10:23:22 PM EDT

Aren't we part of the problem if we stay silent. It's a serious question I've been asking myself

10:23:48 PM EDT

I've been thinking about that too

10:24:50 PM EDT

I know has been talking to a lot of people about it lately

10:24:59 PM EDT

I told my entire class about it once lmao

10:26:17 PM EDT

6/28/20

It's just so gross and it says something about his character which his voters deserve to know

10:26:43 PM EDT

But idk staying silent feels wrong

10:26:47 PM EDT

But I also don't wanna be the only one as selfish as that is

10:27:02 PM EDT

I mean I would be scared to tweet about it, a. Because it didn't happen to me and b. Because I wouldn't want the story to become about me, but rather about his behavior

10:27:45 PM EDT

if you're okay sharing with the group, do you know what's been happening with Justice Dems and Data for Progress and how they're handling the story

10:28:30 PM EDT

Justice Dems know ?

10:28:58 PM EDT

Yup. So basically someone sent an anonymous tip to Justice Dems

10:29:18 PM EDT

If they know and don't do anything I'm gonna expose everyone I swear to god

10:29:25 PM EDT

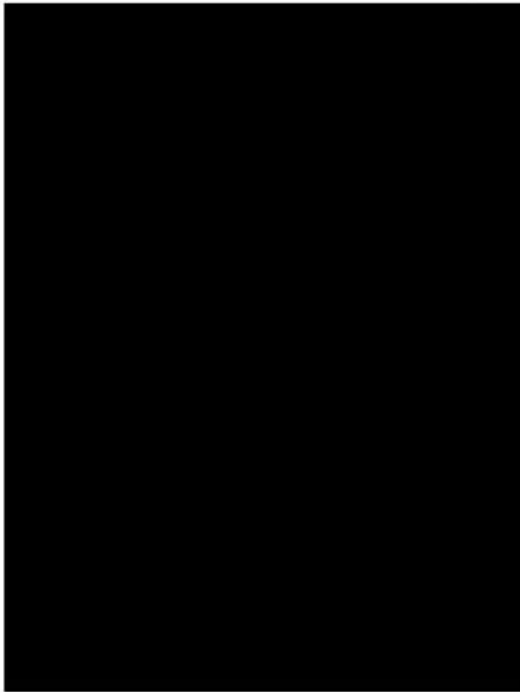
6/28/20

[REDACTED]
And she lives in the district

10:31:58 PM EDT

[REDACTED]
tbh his campaign being a mess is not a secret

10:32:12 PM EDT



[REDACTED]
Ahhh thanks

10:32:39 PM EDT

[REDACTED]
Wowww tea

10:32:47 PM EDT

[REDACTED]
I think its good if he gets exposed

10:32:54 PM EDT

Exhibit 22

7/29/20, 3:38 PM

[REDACTED]
Just talked to Gus and Veronica: they talked to the lawyer and the lawyer said the we need to email Alex Morse's campaign manager and tell him that Alex is no longer welcome at CDMA events (and UMass Dems probably) for xyz reasons. We would vote on that statement before sending it to Morse's campaign. We would then send it the MassDems' counsel for safekeeping. Then, if we want to move forward to leaking it to the press, someone would contact [REDACTED] and tell him (on the record, but unattributable so their name doesn't get published) that the CDMA eboard voted on this and sent it to the CM. That way, [REDACTED] reaches out to the campaign for comment instead of reaching out to us again.

[REDACTED]
It was a short meeting and they filled me in on this so actually there will be no meeting at 8:30 tonight, sorry guys

[REDACTED]
No worries. Thanks for the update

Emphasized "No worries. Thanks for the update "

[REDACTED]
Good to know, so next step is the meeting with the past two eboards + [REDACTED] to write the letter

[REDACTED]
right. Would 9:00 PM work tomorrow

[REDACTED]
Yeah

Should this letter to the Morse campaign be co-signed by all the Dems chapters?

No college Dems chapter will have Neal at events ?

[REDACTED]
I'm actually going on vacation tomorrow and can't make it but I trust y'all

Laughed at "I'm actually going on vacation tomorrow and can't make it but I trust y'all"

Messages - [REDACTED]

[REDACTED]
Morse at events

[REDACTED]
well

[REDACTED] can you send me the anonymous statement

[REDACTED]
We can't say "all college Dems" but yeah

Liked "Morse at events"

I'm saying like

Chapters can sign on

[REDACTED]
No we cannot circulate it that widely

[REDACTED]
We could get into legal trouble

[REDACTED]
Also if you want me to leak it to [REDACTED] I can since he literally just messaged me asking me to chat because he wants to "pick my brain about something"

Liked "Also if you want me to leak it to [REDACTED] I can since he literally just messaged me asking me to chat because he wants to "pick my brain about something" "

[REDACTED]
Oh lordy

[REDACTED]
Emphasized "Oh lordy"

[REDACTED]
[REDACTED] be super careful if you talk to him

That's actually a good idea

Messages - [REDACTED]

[REDACTED]

[REDACTED] needs to be the one to leak it to him

Emphasized "[REDACTED] be super careful if you talk to him"

[REDACTED]

If that's ok [REDACTED]

[REDACTED]

Yeah I wasn't really planning on it

Disliked "[REDACTED] needs to be the one to leak it to him"

[REDACTED]

I didn't use your name but Gus and Veronica said someone with first hand knowledge of this needs to be the one to leak it

[REDACTED]

Without consulting without you guys first

[REDACTED]

[REDACTED] it wouldn't include your name

[REDACTED]

And you would speak to a lawyer first

Why not ^{Student} [REDACTED] — didn't he want to be the one to talk to reporters anyways?

[REDACTED]

[REDACTED] you could totally just see what he wants but just make sure everything you say is off the record

[REDACTED]

mybe

[REDACTED]

We will talk about it

[REDACTED]

And yeah I can send y'all the statement when my friend gets back to me about it. I just texted her

Also could they still sue for this [REDACTED]?

Messages - [REDACTED]

Cause this is like.. the same thing as releasing a public statement no?

[REDACTED]
No it's not

[REDACTED]
Because we didn't release a statement

Explain?

[REDACTED]
We're not releasing the statement. We're leaking the fact that the statement exists

[REDACTED]
Emphasized "We're not releasing the statement. We're leaking the fact that the statement exists"

Laughed at "We're not releasing the statement. We're leaking the fact that the statement exists"

[REDACTED]
And [REDACTED] would reach out to Morse's campaign about it, right ?

[REDACTED]
We wouldn't be giving him what we wrote

How would we ensure that the leaker — whoever it is bc I don't necessarily want to do that — isn't publicized

[REDACTED]
There are terms you can use to do that

[REDACTED]
Like on the record but unattributable or something

[REDACTED]
You would speak to Gus and Veronica first to practice the language

[REDACTED]
Emphasized "And [REDACTED] would reach out to Morse's campaign about it, right ?"

Messages - [REDACTED]

[REDACTED]
"A spokesperson for CDMA"

[REDACTED]
And yes exactly [REDACTED]

[REDACTED]
[REDACTED] would have to go to Morse's campaign and ask what was in the statement

Why can't we just leak the statement?

[REDACTED]
We could get sued for that

[REDACTED]
According to this lawyer

Well fuck

So what exactly will this person be leaking

[REDACTED]
The fact that the statement exists

[REDACTED]
^

[REDACTED]
Emphasized "The fact that the statement exists "

[REDACTED]
Or private letter whatever you wanna call it

[REDACTED]
The fact the the eboard voted on it and decided to send a letter to morse's campaign outlining why he is no longer welcome at our events

But obviously morse wouldn't send the letter over

[REDACTED]
And I'm guessing the person could speak in broad terms what's about

Exhibit 23

To: [REDACTED]
From: [REDACTED]
Sent: Tue 8/11/2020 12:13:33 AM (UTC-04:00)
Subject: I'm a queer man. Stop Alex Morse witchhunt

Hi there, I am a queer man who lived in Northampton for 9 years and worked at [REDACTED] I am very disturbed that consensual sex that violated no ethical codes is now national fodder for a homophobic attack on **Alex Morse** -- an attack that coincidentally defends a corporate donor rich Democratic Party political insider.

Making adults "uncomfortable" because of friendly flirting on social media is homophobic dog whistle. If Neal were a straight man the women he dated would be given the adult respect of consent and the power to say no, not treated like helpless targets of a gay predator with sinister influence in a Mayor's guise.

You may not like that voters prefer a progressive to the left of Neal, but don't fight dirty. This is exactly the political machine maneuvering that has mired the Democratic Party in corporate corruption for decades.

You still have time to turn this around. Speak up for what is right and stop the homophobic witch hunt.

Or perhaps your own allegiance to the college Democrats is more about your career prospects than honorable values? If that's the case then I salute you, as I'm sure you'll be awarded by the same machine working so hard to stop a Democratic party that responds to the people, not rich donors, and keep sell outs like Neal in power.

Sincerely,
[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 24

To: [REDACTED]
From: [REDACTED]
Sent: Wed 8/12/2020 7:15:26 PM (UTC-04:00)
Subject: University Democrats: Contact Request

I hope Alex Morse sues you little psychopaths into fucking oblivion. Evil cunts. is interested in getting in contact with University Democrats.

You can contact I hope Alex Morse sues you little psychopaths into fucking oblivion. Evil cunts. at [REDACTED] if you would like to learn more.

You are receiving this email because you are a member of UMass Campus Pulse.
Manage your [email preferences](#).

Exhibit 25

Most of the problems were referring to occurred at a CDMA event

And we all know that it is affected way more than just umass students, and this problem is unethical whether he is a teacher at umass or not

ALSO that was a rough draft and far from perfect lmao

I agree that it is unethical regardless of his status as a professor, but I do think the fact that he slept with his students (some UDeMs) is by far the most predatory and egregious thing he did and so it's the thing we should focus on in our statement

Emphasized "And we all know that it is affected way more than just umass students, and this problem is unethical whether he is a teacher at umass or not"

Important to note that as far as we know he has not slept with his students

Emphasized "Important to note that as far as we know he has not slept with his students"

Still, UMass students

Yeah he hasn't slept with his students *that we know of* but yes umass students

And I just said this to [REDACTED]

But he used his platform that CDMA provided him with to make college students like Student G and I uncomfortable — and even if me and Student G don't feel like it was a big deal, imagine someone else at a cdma event who might have fallen for it

Whether he teaches at umass or not it's some that CDMA and even Amherst Dems should point out as a problem, not just umass dems

Also his campaign manager introduced our favorite CDgAy [REDACTED] to alex Morse so they could also have a thing

Appendix A

Policy on Consensual Relationships Between Faculty and Students

The University's [Sexual Harassment Policy](#) prohibits unwelcomed sexual advances, but what about situations where both parties willingly consent? Dating or sexual relationships between faculty and students or post-docs (hereafter, "sexual relationships") are also inherently problematic because of the unequal power dynamic between the parties to the relationship, the responsibility of faculty for evaluating students' work, the possibility that other faculty and students may be adversely affected, and because such relationships diminish the trust and respect that ordinarily characterize the faculty-student relationship and are therefore inconsistent with the educational mission of the University. For these reasons, the University strongly discourages such relationships, even when both parties willingly consent.

In order to avoid any conflict of interest or abuse of authority, any faculty member who has any responsibility for supervision, evaluation, grading, advising, employment, or other instructional or supervisory activity related to a student or postdoc is prohibited from entering into a sexual relationship with that individual beginning with the effective date of this policy. For relationships that predate this policy or that began before the faculty member assumed the responsibilities, the faculty member must immediately disclose the relationship to their immediate supervisor and, if possible, remove himself/herself/themselves from these responsibilities.

Where a conflict of interest or potential conflict of interest or abuse of authority exists in the context of a sexual relationship between a faculty member and a student or post-doc predates this policy or arose before the faculty-student relationship or responsibility began, the faculty member involved shall notify their immediate supervisor. The supervisor shall have the responsibility of making arrangements to eliminate any conflict of interest that might prove detrimental to the University or to either party in the relationship, while at the same time maximizing the student/post-doc's educational and professional opportunities. Violations of this policy should be reported to the faculty member's supervisor, who will deal with the matter in accordance with University policy and relevant collective bargaining agreements.

Nothing in this policy should be construed to override or alter the campus Sexual Harassment Policy, <http://www.umass.edu/eod/SexualHarassmentPolicy.pdf>.

Questions about the Consensual Relationships policy should be directed to Associate Provost Michael Eagen.

Appendix B

UNIVERSITY OF MASSACHUSETTS
PRINCIPLES OF EMPLOYEE CONDUCT

Institutions of higher education are entrusted with great resources and commensurably great responsibilities. They must meet their mission of research, teaching, and service in ways that truly enrich the society that supports them and truly serve the students, parents, and alumni who in joining the university community become life-long members of the extended university learning family. College and university leaders play a key role in assuring that high standards of ethical practice attend to the delivery of services to their various constituents and to the custody and use by all their faculty, staff and students of the resources entrusted to them. The University of Massachusetts embraces the values expressed in these Principles of Employee Conduct and expects their observance by all its employees.

University employees are entrusted with public resources and are expected to understand their responsibilities with respect to conflicts of interest and to behave in ways consistent both with law and with University policy.

University employees are expected to be competent and to strive to advance competence both in themselves and in others.

The conduct of University employees is expected to be characterized by integrity and dignity, and they should expect and encourage such conduct by others.

University employees are expected to be honest and conduct themselves in ways that accord respect to themselves and others.

University employees are expected to accept full responsibility for their actions and to strive to serve others and accord fair and just treatment to all.

University employees are expected to conduct themselves in ways that foster forthright expression of opinion and tolerance for the view of others.

University employees are expected to be aware of and understand those institutional objectives and policies relevant to their job responsibilities, be capable of appropriately interpreting them within and beyond the institution, and contribute constructively to their ongoing evaluation and reformulation.

The University is responsible for communicating to University employees the content of these Principles of Employee Conduct and for ensuring that the standards of conduct contained herein are met.

The University expects to provide its employees:

a work environment that is professional and supportive;

a clear sense of the duties of their job, the procedures for performance review, and access to relevant University policies and procedures;

within the scope of each employee's assigned areas of authority and responsibility, the duty to exercise appropriate judgment and initiative in performing duties;

the right to seek appropriate review of matters that violate the ethical principles contained in these Principles.

Appendix C

UNIVERSITY OF MASSACHUSETTS AMHERST
POLICY AGAINST DISCRIMINATION, HARASSMENT,
AND RELATED INTERPERSONAL VIOLENCE

*Including Sexual and Gender-Based Harassment, Sexual
Assault, Sexual Exploitation, Intimate Partner Violence,
Stalking, Complicity, and Retaliation*

C. SEXUAL HARASSMENT

Sexual Harassment is unwelcome conduct of a sexual nature when:

- i. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, education, or participation in University programs or activities; or
- ii. submission to or rejection of such conduct by a person or persons is used as a basis for employment or educational decisions affecting such person or persons, or participation in University programs or activities; or
- iii. such conduct unreasonably interferes with a person or person's work or academic performance; interferes with or limits a person or person's ability to participate in or benefit from a work or academic program or activity; or creates an intimidating, hostile, or offensive working or academic environment.

D. SEXUAL ASSAULT

Sexual Assault is broadly defined as any sexual activity that is forced, coerced, or unwanted.

Consent is permission to engage in communication and/or a specific, mutually-agreed upon sexual activity that is given freely, actively, and knowingly, using mutually understandable and unambiguous words or actions, or—in plain language—to agree to do the same thing, at the same time, in the same way, with each other.

- Consent cannot be inferred by silence, passivity, or not resisting;
- Consent cannot be implied by a current or previous dating or sexual relationship;
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity;
- Consent is not indefinite; it is revocable and may be withdrawn at any time, using words or actions such that a reasonable person would understand a lack of continued consent;
- Consent cannot be given by person who is
 - Asleep;
 - Incapacitated by drugs or alcohol;
 - Unconscious;
 - Mentally or physically incapacitated; or
 - Under duress, intimidation, threat, coercion, or force.
- Consent cannot be given by a person under the age of 16.