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**From:** Lawrence Krauss [REDACTED]  
**Sent:** Tuesday, February 27, 2018 11:38 PM  
**To:** Jeffrey E. [REDACTED]  
**Cc:** Lawrence Krauss  
**Subject:** Re: Private and Confidential, in response to our meeting.

at the airport and delayed for 3 hours so I can write. I have written the university clarifying this again. I understand your concern, but the University can only investigate what they interviewed me about, which is the buzzfeed allegations related to the university.. And, in addition, the University has already dispensed with all the others.. When I met the investigator she simply handed me the document that buzzfeed had sent to the university regarding the claims by former Origins employees.. and asked me to comment on them. That is the 'complaint' they are investigating, and the only complaint they received directly from buzzfeed after December, when all the other complaints were dealt with.   

In any case, I have made it quite clear to them that I am not being represented by Adam..

So, I thank you for letting me to clarify the situation for them, but happily at least your other concern is not relevant at this point.

Lawrence

On Feb 27, 2018, at 3:40 PM, Jeffrey E. <[jeevacation@gmail.com](mailto:jeevacation@gmail.com)> wrote:

you dont understand. AT ALL . . !! they dont need your permission to copy you. They now need your lawyers approval . to copy you her letter is makes clear that your telling them how to do their job is bullshit and they can investigate claims brought by anyone at anytime. . . and complaints made to them are protected from defamation claims. . They just do a new thorough investigation. . and dig deeper. . and take every allegation from buzz and run it down. . and anyone else now who decides to join the bandwagon. . sad!!! as most of this but clearly not all was self inflicted.

On Tue, Feb 27, 2018 at 3:55 PM, Lawrence Krauss [REDACTED] <<mailto:jeevacation@gmail.com>> wrote:

Dear Cynthia et al:

Adam forwarded me your note while on a plane. I wanted to let you know that you can feel free to cc me on all communication or email me and cc Adam, as you wish. Adam is advising me on matters related to Buzzfeed, and so it is appropriate to communicate to both of us in this regard. I expect he will be writing to you. In any case, I wanted to assure you that I will continue to cooperate with all your offices, as I have done thus far. I value the collegial relationship I have with all of my colleagues at ASU. I do hope Naimah's group has taken all of our concerns about buzzfeed under advisement, but I also understand the requirements on the university as well.

Thanks for your attention to =his.

Best

Lawrence Krauss

Lawrence M. =rauss

Director, The Origins Project at ASU

Co-Director, Cosmology Initiative

Foundation Professor

School of Earth & Space =xploration and Physics Department

Arizona State =niversity, P.O. Box 871404, Tempe, AZ 85287-1404

Research Office: [REDACTED] <tel:[REDACTED]> = Assistant (Jessica): [REDACTED]

<tel:[REDACTED]>

Origins Office (Cynthia): [REDACTED] <tel:[REDACTED]>

origins.asu.edu | twitter.com/lkrauss1 | krauss.faculty.asu.edu

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April 5-9th 2018 – Visit for more =nfo <<https://www.origins10year.com/>>

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Begin forwarded message:

From: Adam Waldman <[REDACTED]>

Subject: FW: Private and =onfidential, in response to our meeting.

Date: February 27, 2018 at 12:28:21 PM =ST

To: Lawrence Krauss <[REDACTED]>

Fyi

Just got back =n wifi and reading now

From: =ynthia Jewett [REDACTED] <mailto:[REDACTED]>

Date: =uesday, February 27, 2018 at 3:21 PM

To: =dam Waldman  
<mailto:[REDACTED]  
Cc: =aimah Saadiq <mailto:[REDACTED]>; Erin Ellison  
<mailto:[REDACTED]  
Subject: =W: Private and Confidential, in response to our meeting.

Mr. Waldman,

Your client, Lawrence Krauss, copied me on his February =3rd email =ommunication to the Office of Equity and Inclusion. I am writing =o convey the University's position on its responsibility to =conduct administrative investigations into allegations of conduct that =ould violate institutional policy, if true. Because Dr. Krauss =as retained legal counsel, I am writing directly to you. You may =oward my communication on to your client. Without having first =ecured your permission, I did not think it was proper for me to copying =im on this reply.

Our policy on the Prohibition Against Discrimination, =arassment, and Retaliation (ACD 401 <https://www.asu.edu/aad/manuals/acd/acd401.html>) and its accompanying procedures =P20 – link to the procedures is embedded in the policy =ocument) directs the Office of Equity and Inclusion to conduct prompt =nd equitable investigations. Among the points stated are that the =ffice accepts anonymous complaints as well as direct complaints. =niversity employees are required to cooperate with any investigation or =llegations of violations of this policy. Providing false or =isleading information or failing to cooperate may result in =isciplinary action. Individuals making a complaint or =articipating as a witness in an investigation cannot be retaliated =gainst. Any employee who engages in retaliation will be =isciplined. The Office of Equity and Inclusion does not make any =indings until such time as it determines that it has completed its fact =athering.

Our courts recognize that participants in an =dministrative investigation have a privilege against a defamation =harge. In Paros v. Hoemako Hospital, 140 =riz. 335, 681 P.2d 918 (Ct. App. Div. 2 1984), the court recognized =hat the employer's response to a notice of charge of =iscrimination filed with the Equal Employment Opportunity Commission =as absolutely privileged. In Miller v. Servicemaster by Rees, 174 =riz. at 520, 851 P.2d 240, 243 (Ct. App. Div. 1 1993), the court =ecognized the existence of a conditional privilege for employees to =eport perceived acts of sexual harassment as public policy dictated =hat employees must be protected from workplace sexual harassment. Cited =pprovably, Carey v. Maricopa County, 2009 =L 750225 (D. Ariz. 2009). Both Paros and Miller were =ases concerning discrimination and harassment under Title VII. In =ddition to its obligations under Title VII, the University must also =perate its educational programs and activities to be free from gender =iscrimination under Title IX.

The Office of Equity and Inclusion will proceed with its =nvestigation as outlined in ACD 401 and P20. The Office will not =rovide your client with its investigative file. We look forward =o Dr. Krauss's continuing cooperation. Regards,

Cynthia L. Jewett  
Senior Associate General Counsel  
Arizona State University

From: Lawrenc= Krauss [mailto:[REDACTED]  
Sent: Friday,=February 23, 2018 4:19 PM  
To: Naimah =aadiq [mailto:[REDACTED]]; Cynthia  
Jewett [mailto:[REDACTED]  
Cc: Adam =aldman [mailto:[REDACTED]]; =awrence Kraus [mailto:[REDACTED]]

Subject: Private=and Confidential, in response to our meeting.

Dear Naimah et al: =nbsp;

Attached you will find a letter from my attorney, along with = letter he sent to Buzzfeed earlier in this week regarding the =efamatory and false story they were planning on printing. The =tory was then published yesterday morning. &=bsp; I wanted to add to his letter, to reiterate our concern =bout how your office was planning to follow up on the false and =efamatory third-party allegations from Buzzfeed. Because =his was initiated by an online entertainment news outlet with a clear =genda and established record of propagating false allegations about me, =ather than by any of the individuals they refer to as =ources, this should not be considered a credible allegation worthy =f investigation. I believe that our initial discussion was =ufficient to settle this matter. Whether or not you agree =ith this, there are two =hings I think are important to establish. =nbsp;

Firstly, that the University should =ot propagate what can be false allegations from such a source by =resenting them directly to current and/or former employees or to =thers. To do so would be to further their libelous agenda, as Mr =aldman has emphasized. In this regard, I would appreciate seeing =opies of the correspondence you might send to current or former =mployees about this in the process of carrying out and concluding your =nvestigation.

Secondly, I reiterate once again that =he Origins Project environment is supportive, candid, frank, honest, =nd productive, with all employees being treated with respect, as well =s being supported and mentored. I am proud of our team, and I believe =hey feel the same way.

Thanks for your attention to these letters.

Lawrence Krauss

Dear =s. Saadiq:

My =ame is Adam Waldman, and I am Professor Lawrence Krauss' =itigation counsel. Earlier this week, I sent the attached letter =o Buzzfeed via one of their reporters named Peter Aldhous. =nbsp;

I =m also in receipt of Mr. Aldhous' letter to ASU, which is a =ariation on defamation – both libel and slander – that =r. Aldhous and his colleagues have been manufacturing for at least 6 =onths (notably without any reporting) in a campaign with a purpose =own only to them. Buzzfeed's first method is to call or =rite third parties, posit a list of fake, anonymous, recklessly false =nd malicious "allegations," and ask if the third party =as anything to add. Buzzfeed's second method is to seek =ortious interference with Professor Krauss' professional =ontracts, by writing third parties with whom Professor Krauss is in =rivity, present a similarly inflammatory series of anonymous, =ecklessly false and malicious accusations, and then question: how can =he email's recipient allow such a person to serve on their =oard, or speak at their conference? The letter from Buzzfeed to =he University falls into both categories. There will be appropriate =egal consequences for Buzzfeed's actions.

It is my understanding that your office believes it is =compelled by the above to investigate false, defamatory, anonymous =ccusations posited by the online tabloid Buzzfeed by contacting third =arties and potentially rebroadcasting the tabloid Buzzfeed's =ccusations. To be clear, these accusations were not made to the =niversity by actual human beings who are alleging they were =ictims. There is no evidence they were presented to Buzzfeed by =ctual human beings. Moreover, no present or former employees of ASU =ave made any such allegations to your office, or to any office at ASU, =o our knowledge. They are simply alleged by a tabloid, and one that had =et published a "story" on the topic when they forwarded these =o you. You may propose to rebroadcast this tabloid's libel to =ther third parties who have also made no accusation against Professor =rauss. I suggest that you consult with the University's =ounsel before taking so rash a step as re-broadcasting hearsay =efamation that came to you via an online tabloid under these =ircumstances.

Professor Krauss and I both recognize the absolute need to =nvestigate real allegations. Some of the women who have bravely =ome forward with personal harassment allegations against Harvey =instein are my clients and friends. Some of these victims have =een advised by me. Those actual allegations are entirely distinct =rom a tabloid attempting to manufacture allegations to create harm. =nbsp;

Sincerely,  
Adam =aldman  
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Begin forwarded message:

From: Adam =aldman [REDACTED]  
<mailto:[REDACTED]  
Date: Tuesday, February 20, 2018 at =:42 PM  
To: Peter Aldous [REDACTED]  
Subject: Cease and Desist/Professor Lawrence =rauss

Dear =r. Aldous:

I =m writing as litigation counsel to Professor Lawrence Krauss. It =as come to my attention that you and Buzzfeed have engaged in an =utrageous and protracted defamation campaign against Professor Krauss, =ncluding both libel and slander. Buzzfeed's campaign has =een malicious, undertaken with absolute reckless disregard for the =ruth, and despite repeated disprovals of the falsehoods you continue to =armfully disseminate. Your defamatory efforts have also been =ndertaken, for reasons known only to you and your colleagues, with the =ntention of tortiously interfering with the contracts of Professor =rauss, and Buzzfeed has unfortunately succeeded in this malignant =urpose. We have both testimony and documents from a litany of =ell respected third parties that provide overwhelming evidence of your =nd Buzzfeed's malfeasant attacks on Professor Krauss. We =re still tallying the damage.

You and Buzzfeed will immediately cease and desist from =urther defamatory statements regarding Professor Krauss, and you and =uzzfeed will immediately cease and desist from any further efforts to =ortiously interfere with Professor Krauss' contracts. If =ou and Buzzfeed are unwise enough to ignore this notice to cease and =esist from the actions described above, the appropriate legal response =ill be swift. Notwithstanding the foregoing, all legal rights are =eserved.

If you have more harassing emails or any prospective =ommunication you wish to transmit to Professor Krauss, you are =nstructed to send them to me as he is now represented by counsel. =f your or Buzzfeed's counsel, whomever they may be, wish to send me a =etter in response to the above, be aware that I may, depending on its =ontents and because I would be obligated to forward it to my client, =onsider such letter to also constitute a trigger of the above and react =ccordingly. Professor Krauss has suffered enough abuse at your =ands without commensurate consequences.

Sincerely,  
Adam =aldman

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Co-Director, Cosmology =nitiative  
Foundation Professor  
School =f Earth & Space Exploration and Physics Department  
Arizona State University, P.O. Box 871404, Tempe, =Z 85287-1404  
Research Office: [REDACTED] Assistant (Jessica): [REDACTED]  
Origins Office (Cynthia): [REDACTED]  
[REDACTED] <mailto:[REDACTED]  
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