**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT**
**IN AND FOR MARION COUNTY, FLORIDA**

| | |
|---|---|
| **CHAVON JENEA WRIGHT**,<br>*Petitioner / Plaintiff*, | **CASE NO.:** 2026-CA-_____<br>**DIVISION:** Civil Division |
| v. | **EMERGENCY RELIEF REQUESTED** |
| **HERZING UNIVERSITY, INC.**,<br>*Respondent / Defendant*. | |

**ADDENDUM TO EMERGENCY MOTION TO COMPEL PRESERVATION OF EVIDENCE AND FOR PRELIMINARY INJUNCTIVE RELIEF: UNLAWFUL SUMMARY EXPULSION IN DIRECT VIOLATION OF PUBLISHED INSTITUTIONAL POLICIES AND SATISFACTORY ACADEMIC PROGRESS STANDARDS**

Petitioner Chavon Jenea Wright, proceeding pro se, submits this Addendum to her Emergency Motion to Compel Evidence Preservation and Preliminary Injunctive Relief, setting forth verified factual grounds demonstrating that Respondent summarily expelled Petitioner in bad faith and in direct defiance of every published institutional policy and statutory due process requirement:

**I. PETITIONER SATISFIED EVERY OBJECTIVE ACADEMIC STANDARD AND MET SATISFACTORY ACADEMIC PROGRESS (SAP)**

- **Cumulative Academic Standing:** Petitioner maintains 40.00 earned graduate credits, a 4.00 Science GPA, and a 3.55 Corrected Cumulative GPA (142.0 quality points), fully satisfying published university Satisfactory Academic Progress standards pursuant to 34 CFR § 668.34.

- **Coursework Completion & Content Mastery:** In NU 730, Petitioner timely completed all assigned coursework and earned an 81.27% passing Grade B before Respondent altered the score to 0.0 post-submission without academic justification. In NSG 523, Petitioner completed 145 adaptive learning modules (250% of the 58-module peer baseline) across three terms, proving academic proficiency.

**II. SUMMARY EXPULSION EXECUTED IN DEFIANCE OF EVERY PUBLISHED INSTITUTIONAL POLICY**

- **Defiance of Progressive Discipline and Academic Warning Rules:** Under published catalog policies, an enrolled student maintaining a 3.55 cumulative GPA cannot be summarily terminated. Respondent bypassed all published requirements for progressive academic notices, academic improvement plans, and probationary remediation periods.

- **Defiance of Grade Dispute and Due Process Procedures:** Published catalog rules guarantee students full due process review of disputed evaluations. Respondent executed an unlawful summary termination on September 4, 2026 (Case 00542344) while Petitioner's timely grade dispute remained actively pending, violating established higher education implied contract protections.

- **Defiance of Incomplete Grade and Medical Accommodation Protections:** Following written admissions by ADA Coordinator Emilie Thompson on August 7, 2025 confirming faculty accommodation notices were flawed and extension work must be credited, Respondent refused standard Incomplete grade protections and expelled Petitioner instead.

- **Defiance of Graduate Program Transfer Policy:** Petitioner timely executed a program transfer to the Healthcare and Human Services Leadership graduate program, where 21 of 31 credits (67.74%) were already completed. On September 14, 2026, Student Services Director Angie Zamecnik confirmed in writing that the transfer credit evaluation was completed, yet Respondent withheld the evaluation and blocked registration for November 2 Session B.

**III. DEMONSTRATED BAD FAITH, SPOLIATION, AND EVIDENCE SUPPRESSION**

- **Predetermined Grievance Rejection:** On September 18, 2026, during a recorded video conference (27:15 to 27:41), Director Angie Zamecnik admitted that Petitioner's grievance rejection was predetermined in

private discussions with senior executive leadership prior to review.

- **Digital Lockout to Conceal Evidence:** On October 11, 2026, Respondent deactivated Petitioner's network credentials and learning system access, deliberately obstructing access to grade logs and communication records.

**WHEREFORE**, Petitioner respectfully requests this Court enter an immediate Order: (1) compelling Respondent to preserve all electronic records, SQL database tables, and communication logs; (2) ordering expedited production of Petitioner's withheld educational records, transfer credit evaluation, and disclosure logs; and (3) granting preliminary injunctive relief restraining Respondent from enforcing the unlawful summary expulsion pending final adjudication.

Respectfully submitted,

*/s/ Chavon Jenea Wright*
**Chavon Jenea Wright**, Pro Se
597 Marion Oaks Trail
Ocala, FL 34473
Phone: 352-274-4191
Email: chavon.wright@gmail.com