FRAMED ALLEGATIONS

Allegation 1: That on or about 10 January 2017, Mr. Kenneth L. Schultz, AFIT/ENS, made offensive and discriminatory comments of a sexual nature, to wit: "If one of you were to pull an African-American male into the bedroom, you should check the foot size to verify, and let us know," or words to that effect, to the students of his Management of Logistics Organizations (LOGM) 542 course, in violation of AFI 36-2706, paragraph 1.1.1.

Allegation 2: That on or about 10 January 2017, Mr. Kenneth L. Schultz, AFIT/ENS, made offensive and discriminatory comments of a racial nature, to wit: "If one of you were to pull an African-American male into the bedroom, you should check the foot size to verify, and let us know," or words to that effect; and "high-rho," or words to that effect, in a manner meant to mock Asians, to the students of his Management of Logistics Organizations (LOGM) 542 course, in violation of AFI 36-2706, paragraph 1.1.1.