

Statement of Morgan McCabe

1 My name is Morgan McCabe. I used to teach botany at Utopia University, which was paradise for
2 me. Now I'm working in the Garden Center at Walmart, trying to put my life back together after the
3 havoc Grayson Zayne caused. At least I'm alive to put it back together. For a while I was afraid I'd be
4 sent to jail for my part in the grade scandal, but I avoided criminal charges by testifying against Grayson.
5 Still, my reputation is ruined, and I don't know if that will ever change. I blame Grayson for all of this. I
6 hope Grayson goes to prison for a long time.

7 I've been fascinated by plants since I was a child. My parents are both geologists who teach at
8 UNC-Chapel Hill, and when I was younger, we spent our summers on the road. It was funny; my dad's
9 videos focused on the rock formations we were passing instead of us kids. We were just there to give a
10 sense of scale! But while my parents dug up fossils and stones, I dug up plants for terrariums. In fact, I
11 made so many that I sold them to neighbors when I got home. The money went into my college fund.

12 I'd always dreamed of attending UU. It has one of the best botany departments in the country, and
13 its herbarium is second in size and scope only to the one at Harvard. So when I was accepted early
14 decision, I was over the moon. Once I got there, I never wanted to leave. In fact, I stayed for my Master's
15 and PhD in botany. I also minored in entomology and did some research about the interaction between
16 native plants and foreign insects. I'm by no means an expert in entomology, but I figured a minor would
17 prove helpful in my job search. After I became Dr. McCabe, I looked for a teaching job, but the
18 competition for the few openings at decent universities was pretty fierce. I was glad to stay as a post-
19 doctoral researcher and instructor at UU when nothing else worked out.

20 I met Grayson in the fall of 2011. I was teaching an introductory biology class as part of my post-
21 doc work, and Grayson was a freshman in the class. Botany is part of the Biology department, and as a
22 post-doc, I got stuck with the low-level courses. I also managed the botany lab, and the Department Chair
23 asked me to take over the entomology lab next door, too. A month after classes began, the senior pledge
24 master at Zeta Iota Pi (ZIP), Chip Kaufmann, approached me in a panic. Chip said that Grayson was a
25 new member, but Grayson was in danger of being asked to leave ZIP because Grayson's GPA might drop
26 below the required 3.5 minimum.

27 I was a Zipper myself, and proud of it. ZIP has a national reputation as being very exclusive and
28 prestigious. That's partly because ZIP "taps" the best and brightest freshman before any other Greek
29 society can start their formal rush process. So ZIP gets the best of the best, and the connections formed
30 are life-long and incredibly helpful. Our motto is "We Stick Together," and we take it very seriously. The
31 academic dean and provost at UU are Zippers, and I'm sure that helped when I applied for my post-doc.
32 No one ever really leaves ZIP, or wants to, and I stayed active in the UU chapter.

33 So I could understand why Chip was concerned for Grayson. Chip kept saying that Grayson was
34 the most dedicated Zipper Chip had ever seen, and Grayson was destined to become ZIP president one
35 day. Also, Grayson's dad was a ZIP alumni and a big donor to the UU chapter, so losing Grayson would
36 hurt everyone. But I didn't know what I could do about it, and I said as much to Chip.

37 That's when Chip looked at me intently and said, "But you *can* help us, Morgan. Grayson needs
38 one more 'A' to stay eligible, and you can make that happen." Chip said Grayson was still learning how
39 to balance schoolwork and Zipper activities and just needed someone to give him/her a break. I was taken
40 aback. Sure, we stick together, but I told Chip I didn't *give* anyone an A – it had to be earned. Chip was
41 so insistent, though, that I said I'd consider Grayson's schedule when grading his/her work. Chip thanked
42 me profusely and said I wouldn't regret it. I wasn't quite sure what that meant, but I soon found out when
43 some "anonymous" gift cards from local restaurants and stores started appearing on my desk.

44 It turned out Grayson wanted more than a break on a paper or two, since Grayson didn't show up
45 to a single class for the next six weeks. All of Grayson's papers were short and lacked any meaningful
46 content. I think I wrote better papers in elementary school. When I sent out my mid-semester evaluation,
47 Grayson's was an "F." Consideration is one thing, but fraud is another.

48 Two days later, Chip stormed into my lab, holding Grayson's evaluation in one hand and the ZIP
49 bylaws in the other. Chip demanded to know why I didn't give Grayson an A like I'd "promised." I told
50 Chip I was happy to excuse a late assignment now and then, but I certainly couldn't give As to no-shows
51 who turned in grade-school work. Chip said Grayson was focusing on his/her other classes and didn't
52 have time for mine. Then Chip waved the bylaws in front of my face and made me read aloud Article II,
53 Section 5: "Zippers always stick together and help whenever possible, even when it seems impossible."
54 Chip leaned forward and said, "It's *possible* to give Grayson an A, isn't it? If Grayson goes, we lose a lot
55 more than just one person. You know what I'm saying, right? You *have* to give Grayson an A, or our
56 whole chapter is in jeopardy! Are you a true Zipper, or not?" What could I do? I couldn't let the whole
57 chapter fold, so I reluctantly agreed.

58 Grayson kept skipping class and turning in junk work, but I changed Grayson's grades to As. I
59 hoped it would end after that semester, but that didn't happen because Grayson kept signing up for my
60 classes. Grayson's work got worse and worse. When Grayson turned in a one-page paper on milkweed for
61 my Botany 301 class last spring, I just couldn't stomach it anymore. So I gave Grayson an A-minus
62 instead of an A. That made me feel a little better. I should have given Grayson the F the paper deserved,
63 but I was in too deep myself now to do anything that drastic.

64 It was frustrating, because I knew Grayson was capable of more. You see, Grayson had found a
65 passion for entomology. I didn't teach the class, but I saw Grayson's work in the lab, and it was really
66 top-notch; graduate-level, even. I couldn't help but be impressed. So when Grayson asked for a spot to do

independent research in the entomology lab, I agreed. In fall of 2013, Grayson’s junior year, s/he began a massive project studying the effect of wood-boring insects on wooden structures, focusing on insects native to Utopia as well as foreign invaders. It was interesting stuff, and, as the lab supervisor, I thought it might lead to a paper that I could co-author. “Publish or perish,” as they say. And when Grayson was engrossed in that research, s/he was actually a pleasure to be around. At first, anyway.

But soon Grayson started hinting about other Zippers who needed a little extra “academic boost” – Zippers who were in my classes. Grayson started pushing me to help them, using the carrot-and-stick approach: flattering me as a “true Zipper” when I agreed to help, threatening to expose me if I expressed doubts. Every time, Grayson promised it would be the last request. But it never was. Eventually, because of Grayson, I gave twenty or so Zippers As for doing little to no work. My hands were tied. If I came forward now, I would lose it all: my job, my lab, my plants, my reputation. And Grayson wasn’t shy about reminding me that I got my job because of my ZIP connections – “you got more than you deserved, too!” That wasn’t true; I earned my grades. But I kept my head down, vowing that after Grayson graduated, I’d stop the scam. Only one more year to go, 2014-15, and I’d regain my life and my integrity.

Grayson was on the way to graduating *magna cum laude* with a biology major and entomology minor. Of course, I knew that all of Grayson’s botany grades, at least, were bogus. It annoyed me for Grayson to be receiving undeserved honors. I also envied Grayson’s ability to play the political game of academia. Grayson even got a peer-reviewed paper published with the help of the former entomology chairperson, Shelby Grody. I never liked Shelby, especially after Shelby refused to nominate me for a tenure track job at UU. Shelby sure seemed to like Grayson, though, which irritated me. If only Shelby knew the truth about Grayson!

Grayson stayed at UU during the summer of 2014, working almost non-stop in the lab. At some point, Grayson had gotten really interested in the Formosan Subterranean Termite. Even though it wasn’t native to Utopia, Grayson decided to focus on it for his/her senior thesis. As director of the lab, I had to OK the project. That termite was a bit more dangerous than our native termites, but I saw no harm in allowing Grayson to add it to our lab collection. We had strict procedures in the lab to prevent any of our specimens from escaping. We surely didn’t want to be the cause of any invasive species causing harm to local flora and fauna!

Grayson was unusually excited when the specimens arrived in early June and soon seemed obsessed with the research. Grayson would stay up all night staring at the terrarium where they were kept, making copious notes about “super termites” and separating segments of the colony for random experiments. Some of the experiments seemed so odd that I kind of quit paying attention because I was sure nothing would come of it. I was responsible for the lab, but I wasn’t advising Grayson on the thesis. I figured Shelby would be monitoring Grayson closely.

101 That fall Grayson would be serving as the ZIP Pledge Master, with a huge say in the decision
102 about which freshmen to “tap” into the society. On August 15, 2014, Grayson strutted into the lab and
103 announced s/he was about to tap the “greatest pledge class ever” – Avery Koltasch, Logan Kaufmann, and
104 Harper Finch. But just a couple of weeks later, Grayson came into the lab looking panicked. Grayson was
105 talking a mile a minute, something about a problem with Harper. Grayson said Harper had found one of
106 Grayson’s old papers from my Botany 301 class and was on the way to uncovering the whole grade
107 scheme. My heart sank. If Harper brought the scheme to light, I would crash and burn along with
108 Grayson. Without thinking, I said we couldn’t let that happen.

109 Grayson thought s/he could just fail Harper out of the pledge class and it would all go away. But
110 as the victim of Grayson’s blackmail, I knew that’s not how blackmail works. If Harper got kicked out,
111 Harper would be more motivated to contact the university administration, not less. What would Harper
112 have to lose? I said as much to Grayson, who nodded slowly and said that the only other solution was to
113 scare Harper into keeping quiet. Grayson wanted Harper to know that ZIP was nothing to mess around
114 with. Then Grayson got the idea to put bedbugs in Harper’s bed, as a warning. I didn’t like the idea, but it
115 wouldn’t really hurt Harper. Maybe it would fix the problem. I softly said it was a bad idea, but I didn’t
116 stop Grayson from leaving the lab that night with a Mason jar full of bedbugs. Mason jars really aren’t
117 secure enough for most insect transportation purposes, but they were fine for bedbugs.

118 I didn’t see Grayson at the lab for a few days, so I hoped the bedbug warning had been successful.
119 Then on September 6, Grayson stormed into the lab in a rage. Evidently Harper was still threatening to
120 reveal what she’d found, and Grayson had decided more drastic action was needed. So Grayson had rigged
121 the third Feat of Fortitude to be a donut challenge – which put Harper, a diabetic, into the hospital.
122 Afterward, Harper sent Grayson an email threatening to bring down ZIP if the hazing didn’t stop. I had
123 never seen Grayson so angry.

124 I was shocked that Grayson had put Harper in serious danger, and I told Grayson to stop the whole
125 thing. Keeping the grade scandal quiet wasn’t worth putting someone’s life at risk. I said I thought if
126 Grayson backed off and admitted Harper into ZIP, it would all die down. I wasn’t really sure about that,
127 but I had to calm Grayson down. Yet Grayson would have none of it. S/he kept saying s/he needed to scare
128 Harper into silence and protect the ZIP legacy. Finally, after ranting for 30 minutes or more, Grayson
129 calmed down. S/he told me s/he’d decided on the final Feat of Fortitude: requiring the pledges to “plank”
130 at different locations around campus. I didn’t even know what that was until I looked it up on the internet.

131 Around 6 pm that night, I had a meeting with other faculty to talk about writing grants for new
132 lab equipment. Grayson was still in the lab. I was a bit wary about leaving Grayson unattended, but
133 Grayson assured me s/he just wanted to check on the termites one more time. I said ok and reminded

Grayson to lock up when s/he left. As I was walking to the door, I'm pretty sure I heard Grayson mutter Harper's name and the two words "breaking point."

The next day, September 7, was pretty ordinary. I arrived by 9 a.m. and left by 5:30 p.m. I was supposed to move a few ferns and Venus fly-traps to a new terrarium, but I couldn't find any small plant or insect transports. I searched everywhere, but none were to be found. I figured maybe I left them at home, or someone borrowed them without signing them out. As I was leaving, I passed Grayson's termite terrarium. It looked like it had a lot fewer termites crawling around than usual, but I figured many of them were just hiding in burrows or something. Granted, they'd usually be active at that time of day, but we'd had a mini-heat wave for a few days. I figured that was affecting their behavior. I also thought some might have died from a nasty bacterial contamination we'd been fighting in the lab recently, even though Grayson didn't record any contamination issues in the research log.

A week or so later, when I learned about Harper's death, I nearly fainted. That's when I knew where the termites went. Grayson must have taken them when I left the lab that night and deposited them on the *Paifang* gate. It was no coincidence that the police found Formosan termites on the gate. Grayson had planned it all out ahead of time. I'd been to that gate – who hasn't – it's nearly 30 feet tall! Sure, it was old, but I'd seen dozens of kids over the years climb on and hang from that gate. It wouldn't just collapse like that unless something damaged it. I am stunned Grayson would take things that far. If I'd had any idea, I'd have gone to the authorities myself. I just didn't see the signs, and now this will haunt me the rest of my life. We have some dangerous creatures in our entomology lab – tse-tse flies, black widow spiders, giant Japanese hornets – but Grayson was the real killer at Utopia.

Of the available exhibits, I am familiar with the following and only the following: Exhibit 1 (the Zip Bylaws); Exhibit 4 (photo of Grayson's milkweed paper); and Exhibit 10 (Grayson's lab log notes). The bottom photo of the *Paifang* gate in Exhibit 7 also looks correct to me.

I swear or affirm to the truthfulness of everything stated in this affidavit. Before giving this statement, I was told it should contain everything I knew that may be relevant to my testimony, and I followed those instructions. I also understand that I must update this affidavit if anything new occurs to me until the moment before opening statements begin in this case.

Morgan McCabe

SIGNATURE

December 10, 2014

DATE

Subscribed and sworn before me this 10th day of December, 2014

Kelly Owens

Kelly Owens
Notary Public in and for the State of Utopia

