

U.S. Dept. of Education Office for Civil Rights
Discrimination Complaint
Filed: Jan 29, 2018

Complaint Filed by:

[Redacted]

Name of person discriminated against:
John Doe [Redacted] (for confidentiality reasons)
Address is same as above
Signatures at end of document

Institution engaged in discrimination:
Williams College
880 Main St.
Williamstown, MA 01267
413-597-3131

I am submitting this official complaint against Williams College to the Office of Civil rights. The Boston OCR office (Patricia Cox) has advised that as Williams College is an institution in Massachusetts the complaint should be submitted to the Boston office, rather than reporting this complaint to the office for the state in which we live.

My complaint falls into 2 broad areas of which the OCR regulations enforce, they are: discrimination on the basis of sex (being a male student and treated differently then female students) and retaliation because of filing a complaint.

"John Doe [Redacted]" was continually and systematically denied his civil rights in a joint-sexual assault case that Williams College brought forth under the auspices of a Title IX investigation, beginning in [Redacted] when he was first made aware of these false allegations, through the final moments of denials of appeals and his requests to submit new evidence and ask for further school intervention which was rejected in [Redacted].

He was treated and punished differently than his female counterparts, and was subjected to a cruel and hostile educational environment, as [Redacted]. He was outcast, publicly ridiculed, [Redacted] response to these false claims [Redacted] and [Redacted] [Redacted] — all of which were violations by the school. As a complainant himself, he was not afforded the same protections under

Title IX as the female complainants, and his punishments were harsher than the finding of responsibility in the female respondent's case he brought forth.

I am not pursuing legal action through the courts at this time, but reserve that right should I choose to do so at a later date.

As a result of the personal events outlined within, the school set in motion cases against John Doe from conducted concurrently by a single investigator and presented to two separate hearing panels. Neither willingly came forward to raise a complaint in the Title IX process. Despite their hesitation, they were forced to be part of this by Williams College, and from what we can tell based on their public and on the record comments, did so in a forced or coerced manner. We feel their fear of reprisal at the college's hand may have contributed to their changing testimonies from what they initially reported and was the motivation to coach witnesses and even force retaliatory actions through their agents against John Doe

Outlined below are the incidents of discrimination on the basis of sex, Title IX violations, creating a hostile educational environment on the basis of sex and other violations of John Doe's civil and due process rights by Williams College. It should be well-noted that I, John Doe and his counsel pointed out all these violations by the College while this process was unfolding, pre-hearing, post-hearing and during the appeal process. The school chose to ignore all of them.

We provide this information here with the necessary evidence and data. In the interest of brevity, we have placed the background and historical overview at the end of this document for your reference, and our claims in the forefront.

Williams College Has A History of Bias Against Males

Williams College was sued in federal court in regarding allegations of anti-male bias by the college and by

Evidence
(Exhibit 1)

(Exhibit 2 p.62)

(b)(6);
(b)(7)(C)

Williams College continued their anti-male bias against another John Doe during his time

(b)(6);
(b)(7)(C)

Evidence
(Exhibit 2)

Clery Act Data: Sexual Assault Reports at Williams- Confirm A Hostile Environment For Men

According to statistics available through the Dept. of Education in compliance with the Clery Act, Williams College has one of the highest rates of sexual assault “reporting” of any college in America. In 2014-15 and 2015-16, the most recent years for which data is available, Williams had an average of 14.5 reports of rape each year. This is roughly one report every other week for the 30-week academic year for a community of only 2100 students.

Out of the roughly 1600 4-year colleges in America with more than 750 students, Williams has the 7th highest rate of reports of rape. Williams's rate of 6.68 reports per 1000 people is over 900% higher than the overall rate for all colleges in America.

These numbers would make the dormitories at Williams College one of the most dangerous places in America for women if this many actual sexual assaults took place. So either the college is doing a poor job of protecting women and needs to call in law enforcement for support, or they have created an atmosphere/culture where instances of regretted, consensual sex and other non-sexual assaults are being reported as crimes.

When [redacted] the college is pressuring students to make formal complaints (as has [redacted]), the number of complaints increases and creates a hostile environment for male students. In fact, male students at Williams College are 5x more likely to be accused of sexual misconduct compared to the typical American college male student.

Evidence

(Exhibit 3) CLERY Williams College Rape Rankings 12018.pdf – 7th in Nation

Williams College Discriminates Against Male Complainants

Williams College selectively enforced the no-contact order and created a hostile environment whereby John Doe could not access certain areas [redacted]. When the female complaint violated the order in the exact same way, [redacted] “justified” her actions as inconsequential.

(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

When John Doe [redacted] a space he and the accuser were entitled to share [redacted] reported him for a violation of a no-contact order. [redacted] then called John Doe [redacted] into her office and now changed the rules and [redacted]

(b)(6);
(b)(7)(C)

[redacted]

(b)(6);
(b)(7)(C)

[redacted]

(b)(6);
(b)(7)(C)

[redacted] as John Doe [redacted] had filed a complaint [redacted] against her but John Doe was never afforded the same benefits or accommodations as a complainant as were the female complainants.

(b)(7)(A)

Evidence
(Exhibit 4)
(Exhibit 5)
(Exhibit 6)

[redacted]

(b)(7)(A)

Williams College treats male complainants differently than female complainants thereby discriminating on the basis of sex

(b)(7)(A)

[redacted]

[redacted]

(b)(7)(A)

(b)(6);
(b)(7)(C)
(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

(b)(7)(A)

(b)(7)(A)

(b)(6);
(b)(6);
(b)(7)(C)

On its face [redacted] is in violation in 2 ways: she is discriminating against John Doe [redacted] when he becomes a complainant and denying him an educational [redacted] opportunity and she has a conflict of interest [redacted] because she is unwilling to make accommodations for him because it is inconvenient for her and for the [redacted].

Evidence
(Exhibit 7)

[redacted]

Males Lose When Charged With Sexual Harassment at Williams

Evidence

(Exhibit 8) Massachusetts Civil Action No: 3;16cv-30184-MAP (p.70, #222)
(Exhibit 9) The Williams Record, student newspaper, dated 12-7-16
williamsrecord.com/2016/12/07/former-student-sues-the-college-for-handling-of-title-ix-complaint/

Hostile Educational Environment For Males in a Sexual Assault Investigation

The school promised in the preliminary Title IX letter to John Doe [redacted] that this investigative process would proceed “respectfully and thoughtfully” - yet they denied John Doe [redacted] any kind of consideration, including denying his request for more time to prepare initially [redacted]

[redacted] Title IX allows for exceptions to the 60-day measure when circumstances warrant [redacted]

[redacted]

Simple and humane requests for a few extra days of prep time [redacted].

(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)
(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

were denied time and again by [redacted], in the school's rush to judgment. They were only interested in their process, not a respectful and thoughtful one.

(b)(6);
(b)(7)(C)
(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)
(b)(6);
(b)(7)(C)

When John Doe noted his [redacted] demands and [redacted] had kept him from focusing on preparing, [redacted] admonished him to ignore [redacted] and focus on the charges at hand, as this "serious" issue was a better use of his time.

(b)(6);
(b)(7)(C)

(b)(6);
(b)(7)(C)

He was promised all kinds of support, yet [redacted] was often unavailable for long stretches. When he became a pariah on campus, the school largely ignored his request/

[redacted]

(b)(6);
(b)(7)(C)

[redacted]

(b)(7)(A)

Evidence

(Exhibit 10)

(Exhibit 11)

(Exhibit 12)

(Exhibit 13)

(Exhibit 35) Williams Policy regarding discipline in non-sexual misconduct cases

Williams College Is Overzealous In Its Pursuit of Finding and Trying Male Students for Alleged Instances of Sexual Assault.

(b)(7)(A)

Evidence

(Exhibit 14)

[redacted]

Williams College Has An Entirely Female Administration Leading The Title IX Efforts, Which Promotes Anti-Male Bias

(b)(6);
(b)(7)(C)

Evidence

<http://titleix.williams.edu>

[Redacted]

“The Title IX coordinators should not have other job responsibilities that may create a conflict of interest.”

(b)(6);
(b)(7)(C)

[Redacted]

“Relationship abuse is defined as the use of physical force, coercion, threats, intimidation, isolation, or other forms of physical, or sexual abuse toward a partner in a current or former personal, intimate relationship. Relationship abuse also includes manipulation or other forms of emotional abuse if they have the effect of creating fear*, isolation, or restriction of access to resources, education or work. Relationship abuse includes behaviors that are defined as dating and/or domestic violence for purposes of remedies under Massachusetts law, Title IX, and for Clery Act reporting.”

(b)(7)(A)

(b)(7)(A)

Evidence

(Exhibit 7)

[Redacted]

[Redacted]

Williams College Definition of Terms-Relationship Abuse (pg.1)

<http://titleix.williams.edu/definition-of-terms/>

“Schools are cautioned to avoid conflicts of interest and biases in the adjudicatory process and to prevent institutional interests from interfering with the impartiality of the adjudication.”

(b)(6);
(b)(7)(C)

OCR requires that schools have “adequate, reliable, and impartial investigation of complaints.”

Williams College does not provide adequate training to hearing panelists at the college,

[Redacted]

