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ADMINISTRATIVE COMPLAINT

COMPLAINANT

Lena Sclove
[redacted]

Please direct all correspondence with Complainant to her attorney, Christina Brandt-Young, of Legal Momentum.

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PRELIMINARY STATEMENT

1. This Complaint is filed by Lena Sclove pursuant to Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq*. ("Title IX"), and the regulations and policies promulgated thereunder. *See* 34 C.F.R. § 106 *et seq*. Title IX prohibits discrimination on the basis of sex in federally-funded education programs and activities.

2. As detailed in the Factual and Legal Allegations below, Lena Sclove, a student at Brown University ("Brown"), was strangled twice and sexually assaulted by another Brown student in

Providence, Rhode Island in August 2013. In responding to Ms. Sclove's report of sexual misconduct, Brown failed to issue an adequate sanction, failed to ensure that its decision-makers have adequate training and knowledge regarding sexual violence and related offenses such as strangulation, issued a mutual no-contact order between Ms. Sclove and her respondent even though those are disfavored, directed Ms. Sclove to a health facility that was unequipped to preserve evidence of strangulation or assault, and failed to make clear that she could file both a student misconduct complaint and a criminal complaint. In so doing, Brown violated Title IX by failing to remedy the hostile environment that the assault created for Ms. Sclove, failing to ensure that its decision-makers had adequate training or knowledge regarding sexual violence, and failing to assist her in remedying the effects of the assault.

3. Ms. Sclove requests that OCR investigate these allegations, take all necessary steps to remedy any unlawful conduct identified in its investigation or otherwise on the part of Brown, secure an assurance of compliance with Title IX from Brown, and monitor any resulting agreement. In particular, Brown should expel the respondent to Ms. Sclove's complaint, or in the alternative suspend him until Ms. Sclove has graduated; ensure that its decision-makers have adequate training and knowledge regarding sexual violence and related offenses such as strangulation; eliminate its use of mutual no-contact orders; develop, disseminate, and implement a Clery-Act-compliant policy that refers students reporting possible sexual assaults to health facilities prepared to collect evidence; and develop, disseminate, and implement a Clery-Act-compliant policy that properly explains that student misconduct complaints and criminal complaints are not mutually exclusive.

JURISDICTION

4. OCR is responsible for ensuring compliance with Title IX and receiving information about, investigating, and remedying violations of Title IX and its implementing regulations and guidelines in the region. 34 C.F.R. §§ 100.7, 106.71.

5. Ms. Sclove has not filed this administrative complaint with any other government agency or court.

6. This administrative complaint is timely. Brown University denied Ms. Sclove's appeal on November 15, 2013, which is not more than 180 days ago.

7. Brown University utilizes the various federal student aid programs that are authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. § 1070 et seq. and 42 U.S.C. § 2751 et seq.,[1] and is therefore prohibited by Title IX from discriminating on the basis of sex in its programs and activities.

FACTUAL ALLEGATIONS

8. Lena Sclove is a student at Brown University in Providence, Rhode Island. On Friday, August 2, 2013, just before the start of the second semester of Ms. Sclove's junior year, a fellow student with whom she had previously been intimate walked her home from an off-campus party in Providence. While on the sidewalk, he pinned her against a pole and strangled her, and

[1] *See, e.g.*, http://www.brown.edu/about/administration/financial-aid/2012-13-regular-decision-us-citizens-and-permanent-residents.

despite her protests that she felt unwell and wanted to go home, took advantage of her intoxication to walk her to his apartment off campus shortly thereafter. There, he forced vaginal penetration and strangled her again. Throughout, the respondent ignored Ms. Sclove's statements that she did not want to have sex and her tears. In the immediate aftermath of the assault, Ms. Sclove suffered bruising, including bruising on her neck, and physical pain.

9. Traumatized from the assault, Ms. Sclove waited five days to reach out to any source of help at Brown University. On Wednesday, August 7, she called the Brown Sexual Assault Response Line, which set up an appointment the same day with Brown Health Services. Brown Health Services took a complete history of Ms. Sclove's account of the incident, took blood and urine to test Ms. Sclove for sexually transmitted infections, and provided an emergency contraceptive. Brown Health Services did not perform any physical examination of her or recommend that she visit an emergency room, hospital, or police department for a forensic sexual assault examination. Upon information and belief, Brown Health Services is not equipped to collect evidence of physical assault or strangulation. No one at Brown Health Services explained to Ms. Sclove the option of reporting the assault to the police or the importance of preserving physical evidence. Ms. Sclove was given pamphlets to take home, which stated that any hospital examination should have occurred within 96 hours of the assault, [2] but no one reviewed them with her and she was not able to concentrate to read them because of the trauma she was experiencing.

10. Brown Health Services also referred Ms. Sclove to Brown's Coordinator of Sexual Assault Prevention and Advocacy ("Coordinator"). On Thursday, August 8, the Coordinator assisted Ms. Sclove in drafting an e-mail to the respondent explaining the impact of the assault on her. At the Coordinator's suggestion, Ms. Sclove called the Special Victims Unit of the Brown Department of Public Safety ("SVU") (Brown's campus police) to discuss safety planning around the possibility of future contact with the respondent. The SVU spoke with Ms. Sclove over the phone and also sent her an e-mail reiterating that she could report problems to the Brown Department of Public Safety. Ms. Sclove stayed in frequent contact with the Coordinator over the following week.

11. On August 15, 2013, Ms. Sclove met with the Coordinator and a Dean for approximately an hour to discuss the process for filing a student complaint with the Brown Office of Student Life. Less than five minutes of that meeting were used to explain to Ms. Sclove that she could file a report with the Brown Department of Public Safety or the Providence Police Department for the purpose of pursuing a criminal prosecution. Nonetheless, that meeting, thirteen days after the assault, constituted the first time that a Brown official explained that option in any detail.

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[2] According to the U.S. Department of Justice Office on Violence Against Women, "[e]xaminers and law enforcement representatives, in particular, should be aware of the standard cutoff time for evidence collection in their jurisdictions, which is typically indicated in instructions in evidence collection kits. But it is important to remember that evidence collection beyond the cutoff point is conceivable and may be warranted in particular cases. . . . Individuals responding to sexual assault victims should avoid basing decisions about whether to collect evidence on how they think patients' characteristics or circumstances will affect the investigation and prosecution." Office on Violence Against Women, U.S. Department of Justice, A NATIONAL PROTOCOL FOR SEXUAL ASSAULT MEDICAL FORENSIC EXAMINATIONS 73-74 (2d ed. 2013), *available at* http://www.safeta.org/associations/8563/files/SAFE%20PROTOCOL%202013-508.pdf.

12. Despite her many conversations with Student Health Services, the SVU of the Brown Department of Public Safety, and Brown staff, Ms. Sclove did not receive clear guidance regarding her rights and was left with the understanding that she could pursue a Brown student misconduct complaint or file a criminal complaint, but not both. In these conversations, Brown personnel convinced Ms. Sclove that her assault would be handled more humanely if she opted for the school's disciplinary process instead of the criminal process.

13. On August 20, 2013, Ms. Sclove filed a complaint with the Brown Office of Student Life, the body charged with enforcing the Brown Code of Student Conduct ("Code"). The Code provides that "[s]erious or persistent minor violations of University rules or regulations may result in suspension or expulsion."

14. On August 22, 2013, Brown issued an order directing Ms. Sclove and the respondent to refrain from contacting each other "until the Office of Student Life determines it is no longer necessary." Ms. Sclove was given the options of either no no-contact order at all for either party, or mutual no-contact orders. It was strongly impressed on Ms. Sclove that she would be in significant trouble if she violated the no-contact order.

15. Through fall 2013, Ms. Sclove experienced significant symptoms of trauma, including panic attacks, flashbacks, and depression. Everywhere she walked, she felt that she was being followed. She dropped two internships in mid-August 2013 and was unable to continue them in the fall as planned. She stopped teaching an English class a week early in August 2013. During the period of August to October 2013, she spotted the respondent in the distance at the dining hall, campus center, and main green every week or so, which consistently caused her panic attacks and nausea. She began avoiding all public spaces in order to avoid him and obtained special permission to move out of her dorm and off campus.

16. Brown investigated her complaint during the fall of 2013. Ms. Sclove attended one to three meetings every week relating to different administrative aspects of the process. She also had to organize supporting statements and documentation from numerous witnesses.

17. In order to cope with the trauma and the administrative burden of the complaint process, eventually Ms. Sclove decided to audit one of her classes, which resulted in her attending Brown part-time during the fall 2013 semester.

18. After investigating Ms. Sclove's allegations and holding a full hearing, the investigative board of the Office of Student Life concluded that the respondent was responsible for all charges against him. Accordingly, the respondent was pronounced responsible for four separate violations of the Code: (1) "Actions that result in or can be reasonably expected to result in physical harm to a person or persons"; (2) "Sexual misconduct that involves non-consensual physical contact of a sexual nature"; (3) "Sexual misconduct that includes one or more of the following: penetration, violent physical force, or injury"; and, (4) "Illegal possession or use of drugs and/or alcohol and/or drug paraphernalia."

19. Based on these findings, the investigative board recommended that the respondent be suspended from Brown for two years. However, on October 18, 2013, Senior Associate Dean

declined to follow this recommendation, choosing instead to reduce respondent's suspension to one year, until the fall 2014 semester.

20. Ms. Sclove appealed, pointing out that this sanction would not give her time to complete her coursework and graduate before the respondent returned to campus, and that she feared that her safety would be endangered if the respondent were allowed to return to campus while she was there. Her parents also submitted an appeal letter pointing out that many rapists are serial rapists whose presence endangers the entire student body.[3]

21. On November 15, 2013, Brown's Vice President for Campus Life and Student Services ("Vice President") affirmed the length of the suspension, stating "the length of the suspension imposed . . . is reasonably consistent with precedent in similar cases," but did offer to put the respondent on probation and reinstitute the no-contact order if the respondent returned to campus.

22. As a result of the assault and its aftermath, including Brown's mishandling of the assault, Ms. Sclove was diagnosed with post-traumatic stress disorder, social anxiety, and a noise phobia. She also suffered migraines and a spinal injury in connection with the assault. Because the injury rendered her unable to walk without assistance, Ms. Sclove was forced to spend the spring 2014 semester on a medical leave. Combined with her inability to take on a full course load the previous semester, this circumstance delayed Ms. Sclove's graduation by a full year.

23. In February 2014, Ms. Sclove learned from a source not affiliated with Brown that the Providence Police Department permits sexual assault victims to make reports of crimes without requiring victims to pursue criminal charges. Accordingly, she met with the Providence Police Department in February and March 2014 and made a report about the August 2013 incident.

24. In May 2014, the respondent announced his intention not to return to Brown during the following school year.

25. Ms. Sclove has been contacted by fellow students who have had similar experiences with Brown's handling of sexual misconduct complaints, and makes this complaint on a class basis.

LEGAL ALLEGATIONS

26. Title IX provides in relevant part that "[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance." 20 U.S.C. § 1681(a).

27. Sexual harassment or assault of a student by another student can trigger a funding recipient's duties under Title IX, and inadequate response to sexual harassment or assault by a funding recipient may amount to a violation of the recipient's responsibilities under Title IX. *See, e.g., Fitzgerald v. Barnstable Sch. Comm.*, 555 U.S. 246 (2009); *Davis v. Monroe County Bd. of*

[3] *See, e.g.*, Legal Momentum National Judicial Education Program, THE UNDETECTED RAPIST (2000), *available at* https://www.legalmomentum.org/store/undetected-rapist-dvd; D. Lisak & P.M. Miller, *Repeat Rape and Multiple Offending Among Undetected Rapists*, 17 VIOLENCE AND VICTIMS 73 (2002).

Educ., 526 U.S. 629 (1999); U.S. Department of Education, Office for Civil Rights, "Dear Colleague Letter" regarding student-on-student sexual harassment and sexual violence (Apr. 4, 2011) (hereinafter "2011 Dear Colleague Letter"), *available at* http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf; U.S. Department of Education, Office for Civil Rights, REVISED SEXUAL HARASSMENT GUIDANCE: HARASSMENT OF STUDENTS BY SCHOOL EMPLOYEES, OTHER STUDENTS OR THIRD PARTIES (Jan. 2001) (hereinafter "2001 Guidance"), *available at* http://www2.ed.gov/about/offices/list/ocr/docs/shguide.pdf.

28. "As explained in OCR's 2001 Guidance, when a student sexually harasses another student, the harassing conduct creates a hostile environment if the conduct is sufficiently serious that it interferes with or limits a student's ability to participate in or benefit from the school's program. . . . [A] single instance of rape is sufficiently severe to create a hostile environment. . . . If a school knows or reasonably should know about student-on-student harassment that creates a hostile environment, Title IX requires the school to take immediate action to eliminate the harassment, prevent its recurrence, and address its effects." 2011 Dear Colleague Letter at 3-4.

Brown's failure to assist Ms. Sclove in collecting evidence of the assault, or to inform Ms. Sclove that she could make both a student misconduct complaint and a criminal complaint, violated Title IX.

29. The 2011 Dear Colleague letter requires that "schools need to ensure that . . . employees with the authority to address harassment know how to respond properly." 2011 Dear Colleague Letter at 2. The 2011 Dear Colleague letter also requires that "[s]chools should instruct law enforcement unit employees both to notify complainants of their right to file a Title IX sex discrimination complaint with the school in addition to filing a criminal complaint, and to report incidents of sexual violence to the Title IX coordinator if the complainant consents." 2011 Dear Colleague Letter at 7. Finally, the 2011 Dear Colleague letter requires that "[a]ll persons involved in implementing a recipient's grievance procedures (e.g., Title IX coordinators, investigators, and adjudicators) must have training or experience in handling complaints of sexual harassment and sexual violence, and in the recipient's grievance procedures. . . . In sexual violence cases, the fact-finder and decision-maker also should have adequate training or knowledge regarding sexual violence." 2011 Dear Colleague Letter at 12.

30. Title IX requires that schools ensure that their personnel are properly trained to handle harassment and assault; at a minimum, this includes the ability to comply with the procedures set out in the Clery Act. The Clery Act requires postsecondary institutions to develop and distribute a statement of policy that informs students of "[p]rocedures students should follow if a sex offense occurs, including who should be contacted, the importance of preserving evidence as may be necessary to the proof of criminal sexual assault, and to whom the alleged offense should be reported." 20 U.S.C. § 1092(f)(8)(B)(iii). The relevant implementing regulations also require this policy statement to inform students of their option to notify appropriate law enforcement authorities, including on-campus and local police, and to assure students that the school will assist the student in notifying the authorities if the student requests that assistance. 34 C.F.R. § 668.46(b)(11).

31. The Brown Sexual Assault Response Line's failure to inform Ms. Sclove of the importance of evidence collection when it received her report as required by the Clery Act violated Title IX. Its referral of Ms. Sclove to Brown Health Services was inappropriate in light of the fact that Brown Health Services was apparently not equipped to preserve evidence of a sexual assault or strangulation.

32. During Ms. Sclove's conversations with Student Health Services, the Brown Department of Public Safety, and Brown staff, Ms. Sclove was left with the understanding that she could pursue a Brown student misconduct complaint or file a criminal complaint, but not both. Any written policies stating otherwise either were not provided to Ms. Sclove after her assault, or were confusing, unclear, and further discouraged criminal reporting.

33. Adequate training of Brown's staff would have resulted in their making clear that Ms. Sclove could file both a student misconduct complaint and a criminal complaint. Failure to do so constituted failure to meet Brown's duty to assist Ms. Sclove to remedy the effects of the assault.

Brown's issuance of a mutual no-contact order failed to remedy the hostile environment that the assault created for Ms. Sclove.

34. The Department's previous guidance makes clear that no-contact orders, if issued, should not be mutual. The 2011 Dear Colleague Letter states that "the school may prohibit the alleged perpetrator from having any contact with the complainant pending the results of the school's investigation." 2011 Dear Colleague Letter at 15. The 2001 Guidance states that where "it may be appropriate to . . . separate the harassed student and the harasser," this should be done by "directing the harasser to have no further contact with the harassed student." 2001 Guidance at 16; *see also* 37 n.102.

35. "Issuing mutual protection orders may place a battered woman at greater risk. Mutual orders confuse the police as to the truly dangerous party, and increase the batterer's sense of legitimacy in his violence" by creating the impression that the victim is equally at fault. *See* Catherine F. Klein & Leslye Orloff, *Providing Legal Protection for Battered Women: An Analysis of State Statutes and Case Law*, 21 HOFSTRA L. REV. 801, 1076 (1993). Rather, the best practice is to issue an order of protection only where a party has specifically filed a petition requesting one, supported by allegations that the respondent is dangerous; mutual orders issued against both parties, where only one party has requested one, are disfavored. National Council of Juvenile and Family Court Judges, FAMILY VIOLENCE: A MODEL STATE CODE § 310 (1994), *available at* http://www.ncjfcj.org/sites/default/files/modecode_fin_printable.pdf. Under the federal Violence Against Women Act, states need not provide full faith and credit to any order of protection that was not specifically requested in a petition and made pursuant to a judicial finding that the order was warranted. *See* 18 U.S.C. § 2265(c).

36. In the instant case, issuing a mutual no-contact order ran counter to Brown's duty to "eliminate the harassment, prevent its recurrence, and address its effects." Rather, it placed Ms. Sclove at further risk of retaliation and harassment by the respondent. It is particularly telling that even after Brown found the respondent responsible for sexual misconduct, Brown offered to reinstate the mutual no-contact order should the respondent return to campus, as it demonstrates that Brown is wholly unaware of the risks such an order poses. This too constitutes a failure on

Brown's part to "take immediate action to eliminate the harassment, prevent its recurrence, and address its effects."

Brown's suspension of the respondent for only one academic year failed to remedy the hostile environment that the assault created for Ms. Sclove, and demonstrated that Brown failed to ensure that its decision-makers had adequate training or knowledge regarding sexual violence.

37. The 2011 Dear Colleague letter requires that "[a]ll persons involved in implementing a recipient's grievance procedures (e.g., Title IX coordinators, investigators, and adjudicators) must have training or experience in handling complaints of sexual harassment and sexual violence, and in the recipient's grievance procedures. . . . In sexual violence cases, the fact-finder and decision-maker also should have adequate training or knowledge regarding sexual violence." 2011 Dear Colleague Letter at 12.

38. "Today, it is known unequivocally that strangulation is one of the most lethal forms of . . . violence. When a victim is strangled, she is at the edge of a homicide. Unconsciousness may occur within seconds and death within minutes." Gael B. Strack & Casey Gwinn, *On the Edge of Homicide: Strangulation as a Prelude*, 26 CRIMINAL JUSTICE 32 (2011), *available at http://www.familyjusticecenter.org/Strangulation/On%20Edge%20Of%20Homicide.pdf.* As of April 29, 2014, 38 states had specifically criminalized strangulation in some way. *See* Winston Jones, *New law makes strangulation a felony*, TIMES-GEORGIAN (Apr. 28, 2014), *available at* http://www.times-georgian.com/news/article_a428c514-cf45-11e3-80ac-001a4bcf6878.html.

39. The White House Council on Women and Girls has observed that "[n]otably, campus perpetrators are often serial offenders. One study found that 7% of college men admitted to committing rape or attempted rape, and 63% of these men admitted to committing multiple offenses, averaging six rapes each." White House Council on Women and Girls, RAPE AND SEXUAL ASSAULT: A RENEWED CALL TO ACTION 14 (Jan. 2014) (*citing* D. Lisak & P.M. Miller, *Repeat Rape and Multiple Offending Among Undetected Rapists*, 17 VIOLENCE & VICTIMS 73 (2002)), *available at* http://iaclea.org/visitors/about/documents/WhiteHouseCouncil_sexual_assault_report_1-21-14.pdf.

40. If Brown's sexual misconduct decision-making staff was unaware of the danger of strangulation or the high likelihood that a college rapist would be a repeat offender, that reflects Brown's failure to ensure that its decision-makers in sexual violence cases had adequate training or knowledge as required by Title IX and described in the 2011 Dear Colleague Letter.

41. Brown's obligation was "to take immediate action to eliminate the harassment, prevent its recurrence, and address its effects." The respondent in Ms. Sclove's case engaged in potentially lethal behavior when he twice strangled Ms. Sclove, and the scientific research demonstrated that there was a reasonable chance that he was a repeat sexual offender. As such, the respondent posed an unacceptable risk to the safety of all women at Brown. Brown should have been aware of this and, to prevent the recurrence of sexual assault, its decision-making staff should have expelled him, rather than suspending him for a single year.

42. The Vice President's stated reason for refusing to impose more than a one-year suspension, that "the length of the suspension imposed . . . is reasonably consistent with precedent in similar cases," only raises the question of whether the penalties Brown imposed in similar cases were similarly inadequate.

43. Additionally, the 2011 Dear Colleague letter recognizes that "[b]ecause seeing the perpetrator may be traumatic," a complainant in a sexual harassment case may need to avoid the perpetrator entirely to eliminate the hostile environment created by the assault and prevent its recurrence. *See* 2011 Dear Colleague Letter at 13 n.33.

44. Brown's suspension of the respondent in this case for only one year failed to eliminate the hostile environment in which Ms. Sclove found herself. Although the fact-finding board recommended that the respondent be suspended for two years, which would theoretically have given Ms. Sclove time to complete her degree at Brown without the hostile environment caused by respondent's presence, Brown chose not to implement that sanction. In the end, the respondent's suspension lasted from approximately November 2013 to the end of the spring 2014 semester, a period during which Ms. Sclove at first took a reduced course load, and then took medical leave and was not on campus at all. Although the respondent has announced that he does not intend to return to campus, he could reverse that decision at any time, and Ms. Sclove, who suffers from post-traumatic stress disorder, social anxiety, and a noise phobia as a result of the assault, may yet encounter him in the course of her studies at Brown. This constitutes a failure on Brown's part to "take immediate action to eliminate the harassment, prevent its recurrence, and address its effects."

REMEDIES SOUGHT

45. Ms. Sclove requests:

a. that OCR investigate Brown to determine whether it is allowing discrimination on the basis of sex under its education program. *See* 42 U.S.C. § 1681(a).

b. that OCR take all necessary steps to remedy any unlawful conduct identified in its investigation or otherwise on the part of Brown, as required by Title IX and its implementing regulations. 34 C.F.R § 106.3(a).

c. that if any violations are found, OCR secure an assurance of compliance with Title IX from Brown, as well as full remedies for the violations found. See U.S. DEPARTMENT OF EDUCATION, OFFICE FOR CIVIL RIGHTS, *OCR Case Processing Manual* § 304 (Jan. 2010), *available at* http://www2.ed.gov/about/offices/list/ocr/docs/ocrcpm.html#I_8 (setting forth guidelines for resolution agreements). In particular, Brown should expel the respondent to Ms. Sclove's complaint, or in the alternative suspend him until Ms. Sclove has graduated; ensure that its decision-makers have adequate training and knowledge regarding sexual violence and related offenses such as strangulation; eliminate its use of mutual no-contact orders; develop, disseminate, and implement a Clery-Act-compliant policy that refers students reporting possible sexual assaults to health facilities prepared to collect evidence; and develop, disseminate, and implement a

Clery-Act-compliant policy that properly explains that student misconduct complaints and criminal complaints are not mutually exclusive.

d. that OCR monitor any resulting agreements with Brown to ensure that compliance with Title IX is achieved.

e. Finally, Legal Momentum is a non-profit organization that has taken on representation of the Complainant pro bono and has put in a significant amount of time working to resolve this matter, including attorney time in drafting the complaint, and phone calls with our client. We have complete documentation of our time spent and expenses, and will make them available to OCR upon request regarding fees and costs.

Respectfully submitted,

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