

To: The Honorable Eric Dreiband
U.S. Department of Justice
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Washington, DC 20530-0001
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HONORABLE ASSISTANT ATTORNEY GENERAL OF
CIVIL RIGHTS,

PLEASE NOTE THAT I HEREBY FILE THIS FEDERAL CIVIL RIGHTS COMPLAINT (TITLE IX) AGAINST STANFORD UNIVERSITY. I AM SUBMITTING THIS COMPLAINT TO THE JOINT JURISDICTION OF THE DEPARTMENT OF JUSTICE: CIVIL RIGHTS DIVISION AND THE DEPARTMENT OF EDUCATION: OFFICE FOR CIVIL RIGHTS.

YOURS TRULY,

KURSAT CHRISTOFF PEKGOZ
PROVOST'S FELLOW
DEPARTMENT OF ENGLISH
UNIVERSITY OF SOUTHERN CALIFORNIA

CC: Assistant Secretary of Civil Rights, Kenneth Marcus: kenneth.marcus@ed.gov, klmarcus@brandeiscenter.com
CC: Department of Justice (Education) Electronic Submission Portal, education@usdoj.gov
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PROLOGUE

Women are the overrepresented sex among college students nationwide.¹ They are also the majority of law students² and medical students.³ New civil rights data published by the Department of Education makes it clear that concerns over the underrepresentation of women in STEM education are outdated.⁴ 77% of all teachers in the public education system are women.⁵ Girls have higher grades than boys in all categories.⁶ Men are beginning to face workplace discrimination due to this disparity in terms of college degree attainment. Women who apply to STEM degrees are far more likely to be hired than men.⁷ A recent study found out that women are 36% more likely than men to receive a job offer.⁸ Men work in more dangerous jobs and they are more likely to suffer permanent or grievous harm.⁹ The gender pay gap myth ignores many variables.¹⁰ Even if the gender gap were true, the fact remains that women control more wealth than men (60% of all personal wealth) and that women spend more money than men (85% of all customer purchases).¹¹

According to institutions that release such data, the overwhelming majority of all persons sanctioned under Title IX theory are male.¹² However, women are as likely to engage in sexual pressure/violence against men as vice versa.¹³

¹https://nces.ed.gov/programs/digest/d16/tables/dt16_322.20.asp>>

²<https://www.nytimes.com/2016/12/16/business/dealbook/women-majority-of-us-law-students-first-time.html>

³https://www.washingtonpost.com/local/social-issues/women-are-now-a-majority-of-entering-medical-students-nationwide/2018/01/22/b2eb00e8-f22e-11e7-b3bf-ab90a706e175_story.html?utm_term=.3873f1eff392

⁴<https://www.ed.gov/news/press-releases/us-department-education-releases-2015-16-civil-rights-data-collection>

⁵<https://nces.ed.gov/pubs2017/2017072.pdf>

⁶<http://www.apa.org/news/press/releases/2014/04/girls-grades.aspx>

⁷<http://www.pnas.org/content/early/2015/04/08/1418878112>

⁸<http://insight.movemeon.com/insight-analysis/gender/women-more-likely-to-get-hired-than-men>

⁹<https://www.forbes.com/sites/timworstall/2016/12/21/heres-your-gender-pay-gap-fatal-occupational-injuries/#3c5143d36c3e>>>

¹⁰ <https://www.wsj.com/articles/the-wage-gap-myth-that-wont-die-1443654408>

¹¹ **Sources:** Federal Reserve, MassMutual Financial Group, BusinessWeek, Gallup.

<https://girlpowermarketing.com/statistics-purchasing-power-women/>

¹² Stanford: <https://news.stanford.edu/2018/02/27/provost-issues-campus-wide-report-title-ix-sexual-harassment-cases/>

Yale: [https://provost.yale.edu/sites/default/files/files/FINAL%20February%202018%20Report\(1\).pdf](https://provost.yale.edu/sites/default/files/files/FINAL%20February%202018%20Report(1).pdf)

¹³ Stemple, et al. "Sexual Victimization Perpetrated by Women: Federal Data Reveal Surprising Prevalence." *Aggression and Violent Behavior*, vol. 34, 2017, pp. 302-311.

JURISDICTION

Title IX complaints are often delegated to various regional chapters of the Department of Education. However, nothing in the Case Processing Manual prohibits joint prosecution by the Department of Justice and the Department of Education. Indeed, there is language in the Manual which supports such prosecution and there is also precise precedent for co-prosecution.¹⁴ There is no clear language indicating that the Department of Justice can shirk its investigative duties when a complainant specifically files a Title IX complaint with the Department of Justice.

LEGAL THEORY

The Supreme Court prohibits gender discrimination against men. In *Craig v. Boren*, the Supreme Court criticized the use of sex in a statute that prohibited vendors from denying only to males the option to purchase a higher alcohol content beer.¹⁵ The Court found the statute's reliance on "broad sociological propositions by statistics ... a dubious business, and one that inevitably is in tension with the normative philosophy that underlies the Equal Protection Clause."¹⁶ Original and appellate courts have proscribed sex discrimination against men as well as women,¹⁷ and decisions have been based on different laws and statutes including Title IX, Title VI, Title VII and the Fourteenth and Fifth Amendments.¹⁸

¹⁴ <https://www2.ed.gov/documents/press-releases/montana-missoula-letter.pdf>

¹⁵ *Craig v. Boren*, *supra*, at p. 204.

¹⁶ *Ibid.* at p. 210. "We conclude that the gender-based differential contained in Okla. Stat., Tit. 37, § 245 (1976 Supp.) constitutes a denial of the equal protection of the laws ... and reverse the judgment of the District Court." The Court allowed the vendor to "rely upon the equal protection objections of males 18-20 years of age to establish her claim of unconstitutionality of the age-sex differential." *Id.* at pp. 192-93.

¹⁷ *Craig v. Boren*, 429 US 190, 202, 204 (1976) ("Indeed, prior cases have consistently rejected the use of sex as a decision-making factor even though the statutes in question certainly rested on far more predictive empirical relationships than this."); *Sessions v. Morales-Santana*, 137 S. Ct. 1678, 582 US ___, 198 L. Ed. 2d 150 (2017) (invalidating a law that treated men less favorably than women in determining citizenship); *Orr v. Orr*, 440 U.S. 268 (1979) (invalidating Alabama statute that imposed alimony obligations on husbands, but not wives); *Caban v. Mohammed*, 441 U.S. 380 (1979) (invalidating New York statute that required the consent of the mother, but not the father, to permit the adoption of an illegitimate child).

¹⁸ In *Glenn v. Brumby*, 663 F. 3d 1312 (11th Cir. 2011) the Eleventh Circuit drew upon U.S. Supreme Court cases interpreting Title VII to reach its conclusion in favor of the plaintiff, even though the plaintiff chose to pursue only a remedy for the Fourteenth Amendment violation.

The Supreme Court has consistently rejected “overbroad generalizations about the different talents, capacities or preferences of males and females” as a basis for sex classifications in other state and federal laws.¹⁹ In *Mississippi Univ. for Women v. Hogan (Hogan)*,²⁰ the Supreme Court held that denying men enrolment in a nursing program was impermissible gender classification under the Equal Protection Clause of the Fourteenth Amendment.²¹ Though the issue concerned an equal protection challenge,²² the decision is helpful in evaluating whether Stanford’s sex restriction for certain benefits is reasonable. In *Hogan*, the Supreme Court reasoned that a sex classification must be

...determined through reasoned analysis rather than through the mechanical application of traditional, often inaccurate, assumptions about the proper roles of men and women. Care must be taken in ascertaining whether the statutory objective itself reflects archaic and stereotypic notions. Thus, *if the statutory objective is to exclude or "protect" members of one gender because they are presumed to suffer from an inherent handicap or to be innately inferior, the objective itself is illegitimate* [italics added]²³

Mississippi Univ. for Women v. Hogan, 458 U.S. 7, 18, 724 (1982)

Circuit courts agree with this normative philosophy and expanded upon the use of Title IX to eliminate discrimination against men. The Second Circuit of Appeals has clarified that discrimination against men is unconstitutional even in the absence of malicious intent *and* even for a short period of time.²⁴ The Sixth Circuit of Appeals has clarified that unlawful anti-male bias can be inferred when the overwhelming majority of the impacted parties are male.²⁵

¹⁹ *United States v. Virginia*, 518 U.S. 515, 533 (1996) (denying women admission to a state military institute); see also, *Sessions v. Morales-Santana*, 137 S. Ct. 1678, 582 US __ (2017) (invalidating law that effectively treated men less favorably than women in acquiring U.S. citizenship); *Weinberger v. Wiesenfeld*, 420 U. S. 636, 640-41, 653 (1975) (invalidating federal law that denied benefits to male single parents, but allowed benefits for females).

²⁰ *Mississippi Univ. for Women v. Hogan*, 458 U.S. 7, 18, 724 (1982)

²¹ *Ibid.*, at pp. 720-21, quoting *Wengler v. Druggists Mutual Ins. Co.*, 446 U. S. 142, 150 (1980).

²² *Ibid.*, at p. 730. Under the Equal Protection Clause, the discriminating entity must be a government or state actor and must show the gender classification serves "important governmental objectives and that the discriminatory means employed" are "substantially related to the achievement of those objectives." *Ibid.* at p. 724. Claims may be brought under both Title IX and for violations of equal protection under 42 USC § 1983. *Fitzgerald v. Barnstable School Committee*, 555 U.S. 246, 129 S.Ct. 788, 790 (2009)

²³ *Ibid.*, at pp. 724-725.

²⁴ “A defendant is not excused from liability for discrimination because the discriminatory motivation does not result from a discriminatory heart, but rather from a desire to avoid practical disadvantages that might result from unbiased action. A covered university that adopts, even temporarily, a policy of bias favoring one sex over the other in a disciplinary dispute, doing so in order to avoid liability or bad publicity, has practiced sex discrimination, notwithstanding that the motive for the discrimination did not come from ingrained or permanent bias against that particular sex” (*Doe v. Columbia University*, No. 15-1536, 2nd Circuit 2016, p. 26, footnote 11).

²⁵ “The statistical evidence that ostensibly shows a pattern of gender-based decision-making and external pressure on Miami University supports at the motion-to-dismiss stage a reasonable inference of gender discrimination ... nearly ninety percent of students found responsible for sexual misconduct

The plain language of Title IX, predicated in 34 CFR §106, prohibits any institution from funding/sponsoring discriminatory scholarships, programs, fellowships and initiatives.²⁶ Title IX prohibits recipients from listing, soliciting, approving, sponsoring discriminatory scholarships even if they are entirely external to the University.²⁷ Title IX prohibits discrimination in terms of counselling.²⁸ Title IX prohibits discrimination in terms of health benefits.²⁹ Title IX prohibits any kind of *preference* for admission in any educational entity, or its substituent chapters.³⁰ In determining whether discrimination occurs, Title IX requires an assessment of the *overall effect*.³¹

There are even narrower Title IX precedents for this complaint. For example, Michigan State University in 2016 converted a women-only study space in the Michigan Union to a study lounge that is now available to students of all genders, following a Title IX complaint.³² Texas A&M University was subject to a Title IX complaint because it eliminated its last male-only dorm while preserving multiple female-only dorms.³³ The press has reported that the Department of Education is investigating Yale University,³⁴ the University of Southern California,³⁵ and Tulane University³⁶ for similar Title IX violations. The Oregon Department of Education compelled South Eugene High School to replace the title “Axemen” with “Axe” in order to promote inclusivity.³⁷ In a previous Title IX precedent, the University of Southern California agreed to change the name of the “Center for Women and Men” (implying a hierarchy of victimhood) into “Relationship and Sexual Violence Prevention Services.” The gender-neutral title had a substantial, positive effect on male participation in the Center.³⁸ In a different precedent, Stanford University agreed that

between 2011 and 2014 have male first-names” (*Doe v. Miami University*, No. 17-3396, 6th Circuit 2018, p. 15).

²⁶ Such is the overall intent of CFR § 106.

²⁷ CFR § 106.37.

²⁸ CFR § 106.36.

²⁹ CFR § 106.39.

³⁰ CFR § 106.22.

³¹ CFR § 106.37.

³² https://www.washingtonpost.com/news/wonk/wp/2016/07/28/a-male-professor-says-this-women-only-study-lounge-is-sexist-and-illegal/?utm_term=.e559327d8b60

³³ <https://www.thecollegefix.com/post/31646/>

³⁴ <https://www.campusreform.org/?ID=10899>

³⁵ <https://www.campusreform.org/?ID=10931>

³⁶ <https://www.breitbart.com/tech/2018/09/13/tulane-facing-education-department-investigation-for-female-only-scholarships/>

³⁷ http://www.oregonlive.com/education/index.ssf/2018/02/eugene_officials_chop_south_eu.html

³⁸ In 2014, only 71 male students used the *Center for Women and Men* throughout the academic year. By 2016, this number had increased to 1943 male students (Title IX Complaint Against the University of Southern California, Docket #09-16-2128, p. 21).

female-only gym training hours constitute a violation of Title IX and offered to create male-only gym training hours to create a sense of balance.³⁹

Nowhere in this complaint do we infer discrimination based on disproportionate enrolment alone.⁴⁰ The fact that these scholarships and programs are endorsed as “women only” is sufficient, in and of itself, to infer disparate treatment. Such endorsement has a clearly dissuasive effect on males. This effect is akin to a German campus rejecting Jewish applicants in excess of the maximum quota⁴¹ or state-sanctioned hate speech against non-Muslims in Saudi Arabia⁴² or indeed, the “separate but equal” doctrine struck down in *Brown v. the Board of Education*. As such, such exclusionary language and practices create a hostile environment against prospective male applicants. As per DOE policy, hostile environment can occur even in the absence of intent to harm or even if the hostility is not directed at a particular target. Nor does hostile environment require sexual intent: gender animus or hostility based on sexual stereotypes is sufficient to trigger Title IX liability (*Dear Colleague Letter*, 2010, p. 8).⁴³ This includes situations in which “students are harassed for exhibiting what is perceived as a stereotypical characteristic for their sex” (*ibid*). For example, men who are subjected to negative stereotypes on the basis of being men are protected by Title IX.

Given the *overall effect*, no reasonable person would inquire whether it is necessary to identify any male students who have specifically applied to these programs (and who have specifically received rejections) before the United States can take corrective action against the discrimination. DOJ/DOE must not inquire whether any futile applications have been made to these exclusionary programs before issuing injunctive relief against them. For example, an organization with a “Whites Only” sign triggers Title VII/Title VI liability even in the absence of prospective plaintiffs who “go through the motions of submitting an application.” Supreme Court doctrine is unambiguous on this question: in the presence of clearly discriminatory practices, the victims of discrimination are not the small class of people who “subject themselves to personal rebuffs” but all persons who are negatively

³⁹ “The University informed OCR that it has modified the weightlifting program. It has now instituted both “men-focused” and “women-focused” weightlifting hours, which are open to all students regardless of gender. Both weightlifting sessions are open for the same amount of time two times a week” (Title IX Complaint Against Stanford University, Docket #09-18-2175, p. 1).

⁴⁰ The ratio of female/male enrolment is relevant only in terms of determining the “underrepresented sex.” Women are no longer the “underrepresented sex” in colleges.

⁴¹ *The Law against Overcrowding in Schools and Universities*:

https://link.springer.com/chapter/10.1007%2F978-3-0348-9008-3_12

⁴² <https://www.aljazeera.com/news/2017/09/hrw-saudi-arabia-hate-speech-target-minorities-170926082722213.html>

⁴³ <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.pdf>

effected despite their “unwillingness to engage in a futile gesture.” Put in other words, the United States cannot limit itself to offering redress to men who specifically apply to programs and offerings which refer to themselves as “Women Only” (or which maintain all-female compositions despite meaningless disclaimers or ambiguous language).

If an employer should announce his policy of discrimination by a sign reading "Whites Only" on the hiring-office door, his victims would not be limited to the few who ignored the sign and subjected themselves to personal rebuffs. The same message can be communicated to potential applicants more subtly but just as clearly by an employer's actual practices - by his consistent discriminatory treatment of actual applicants, by the manner in which he publicizes vacancies, his recruitment techniques, his responses to casual or tentative inquiries, and even by the racial or ethnic composition of that part of his work force from which he has discriminatorily excluded members of minority groups. When a person's desire for a job is not translated into a formal application solely because of his unwillingness to engage in a futile gesture he is as much a victim of discrimination as is he who goes through the motions of submitting an application.

Teamsters v. United States, 431 U.S. 324, 365 (1977)⁴⁴

The analogy presented herein (comparing “Whites Only” programs to “Women Only” programs) is legally binding. The Congress made little meaningful distinction between sexual discrimination and racial discrimination in qualifying the Civil Rights Act of 1964.⁴⁵ Another binding Supreme Court precedent which rules out the necessity of identifying an entire class before challenging openly discriminatory policies is *Weinberger v. Wiesenfeld* (1975). In this precedent, the Supreme Court upheld a district court ruling in which a single widower was granted standing to challenge (and strike down) an openly discriminatory policy:

“Wiesenberg applied for social security benefits for himself and his son, and was told that his son could receive them but that he could not. [...] He claimed that the relevant section of the Social Security Act unfairly discriminated on the basis of sex and sought summary judgement. [...] Appellee filed this suit in February 1973, *claiming jurisdiction under 28 U.S.C. 1331, on behalf of himself and of all widowers similarly situated. [emphasis added]*. He sought a declaration that 402 (g) is unconstitutional to the extent that men and women are treated differently, an injunction restraining appellant from denying benefits under 402(g) solely on the basis of sex, and payment of past benefits [...] After the three-judge court determined that it had jurisdiction, it granted summary judgement

⁴⁴ <https://supreme.justia.com/cases/federal/us/431/324/>

⁴⁵ The analogy is legally binding because Title IX, which prohibits discrimination on the basis of sex in educational institutions, uses the language of Title VI, which prohibits discrimination on the basis of race or national origin. 117 CONG. REC. 30,156 (1971).

in favor of appellee, and issued an order giving appellee the relief he sought.”

Weinberger v. Wiesenfeld, 420 U.S. 636 (1975)⁴⁶

There are other very real and very pressing reasons which make it not only impractical but also impossible to identify a class of grievants, or even individual male complainants. Male students/professors who raise such concerns are often silenced with extreme prejudice. Lake Ingle, a male student, was kicked out of class in Indiana University for engaging in civil disagreement with a radical feminist professor (March 2018).⁴⁷ A board member at the University of Virginia (Fred W. Scott Jr.) was forced to resign from his position because he criticized female-only programs at the University (August 2018).⁴⁸ A male professor (Rick Mehta) was fired from Acadia University because of “sexist” comments (September 2018).⁴⁹ Catholic University of America suspended a male dean for merely questioning Julie Swetnick, who made transparently false allegations against the Supreme Court nominee, Brett Kavanaugh (October 2018).⁵⁰ When the cost of free speech is so high and the chilling effect is so potent, it would be unreasonable to shift the burden of gathering such elusive evidence upon the complaining parties. In writing this complaint, I have been in ongoing communication with two male Stanford students, who expressed initial enthusiasm. Both students have engaged in advocacy in terms of opposing gender discrimination against men in the past. However, they ultimately declined to come forward due to fears of administrative retaliation.

Another obstacle is institutional resistance. Institutions often conceal or resist the disclosure of vital civil rights data in order to avoid legal liability, making it even more impractical for a reasonable complainant to obtain such evidence. For example, Georgetown University has resisted the disclosure of such data in

⁴⁶ <https://supreme.justia.com/cases/federal/us/420/636/#tab-opinion-1951258>

⁴⁷ <http://www.foxnews.com/us/2018/03/12/college-student-kicked-out-class-for-telling-professor-there-are-only-two-genders.html>

⁴⁸ “There are no United White People College Funds or White Students' Alliances or Men Against Drunk Driving. Eeven at a ‘tolerant university’ ... especially there! Women's Initiative [sic]. We both support it. Is there a Men's Initiative???”

<https://www.insidehighered.com/quicktakes/2018/09/06/uva-center-board-member-resigns-after-explaining-why-women-didnt-want-go-shoe>

⁴⁹ <https://www.andrewlawton.ca/pro-free-speech-professor-rick-mehta-fired-by-acadia-university/>

⁵⁰ <https://thehill.com/blogs/blog-briefing-room/news/409090-catholic-university-suspends-dean-over-comment-that-degraded>

the past.⁵¹ Likewise, Yale University resisted federal directives⁵² and destroyed crucial information during a pending lawsuit.⁵³ While we were able to obtain data about Stanford's discriminatory policies in financial aid distribution, this data surfaced only accidentally and is not available on a routine basis.⁵⁴ The United States can easily overcome this problem by requesting copies of internal complaints filed with Stanford University, in addition to conducting unbiased polls (both with Stanford students, and with the public at large) to solicit public opinion.

The complaint is timely because all programs listed in the complaint listed below involve ongoing and systematic gender discrimination. Moreover, we are requesting indefinite waivers on each and every allegation. DOE: OCR⁵⁵ and DOJ: CRD⁵⁶ can reopen "cold" cases whenever proper (even if they were previously dismissed) and waive the deadline under a series of circumstances. Specifically, cases are reopened whenever there is compelling national interest and/or overwhelming public support behind the issue. There is indeed compelling national interest in stopping the demographic decline of men in the higher education system. An undereducated class of men are more likely to end up in criminal activity, less likely to support their dependents, and less likely to support the infrastructure of the nation.

Moreover, significant public support exists behind the public policy proposed herein. For example, after Yale University was placed under a similar investigation, a news article by Fox News gathered 1,500+ positive comments.⁵⁷ A video by Stephanie Hamill received 1.4 million views.⁵⁸ Two articles about similar complaints (published on Campus Reform) were shared 12,000+ times on social media.⁵⁹ 61% of male students at Yale University agree (at least in part)

⁵¹ "Repeated attempts to obtain data on any gender inequity at Georgetown have been rebuffed or ignored by campus officials." <https://www.thecollegefix.com/georgetown-creates-task-force-to-advance-gender-equity-but-refuses-to-discuss-gender-statistics/>

⁵² "Despite the Trump administration's reversal of Obama-era policies encouraging schools to use affirmative action to diversify their student bodies, Yale will continue to use race as a factor in admissions." <https://yaledailynews.com/blog/2018/07/05/yale-to-continue-using-race-in-admissions-defying-trump-administration/>

⁵³ "The destruction of those notes could be a violation of federal law, legal experts say." <https://yaledailynews.com/blog/2018/09/21/legal-experts-yale-may-have-violated-clery-act/>

⁵⁴ <https://www.sfchronicle.com/education/article/Stanford-University-data-glitch-exposes-truth-12396695.php>

⁵⁵ <https://www.algemeiner.com/2018/09/07/education-dept-to-probe-whether-rutgers-university-tolerates-hostile-environment-for-jewish-students/>

⁵⁶ <https://www.thecrimson.com/article/2018/5/23/yir-admissions-analysis/>

⁵⁷ <http://www.foxnews.com/us/2018/05/18/yale-being-probed-by-doe-accused-toxic-environment-against-men.html>

⁵⁸ <https://www.facebook.com/Americanvoicesthedailycaller/videos/683586881973534/>

⁵⁹ <https://www.campusreform.org/?ID=11249> && <https://www.campusreform.org/?ID=10899>

with the operational logic the complaint, according to at least one poll conducted by Yale itself, and 26% of male students believe they were specifically victims of anti-male discrimination themselves.⁶⁰ Last but not least, according to recent poll conducted by YouGov, 69% of all Americans believe that men face discrimination to some extent. 74% of men believe that such discrimination occurs, while 63% of women agree that men face some degree of discrimination (**Attachment A, page 102**). Given such popular support, no agent of United States has the liberty to shirk his/her duty to the democratic will of the people by refusing to prosecute complaints which challenge anti-male discrimination in colleges.

The complaint seeks to eliminate gender discrimination against men without jeopardizing the civil rights of women. When injunctive relief is granted, the female majority will still be able to compete with the male minority on equal footing.

⁶⁰ <https://yaledailynews.com/blog/2018/09/16/mens-rights-move-in-on-yale/>

LIST OF EXCLUSIONARY PROGRAMS

This list includes some of the exclusionary programs and scholarships, external or internal, active as of October 2018. The list is neither exhaustive nor final: OCR should request information regarding *all* women-only spaces, scholarships, fellowships, initiatives, departments, programs, lectureships, committees, groups, and events that are currently active at Stanford University.⁶¹ Title IX also prohibits discrimination in programs which are externally funded if these programs use campus space or receive any other form of institutional endorsement. There are no male-only programs at Stanford University.

1. **Stanford University** violates Title IX by expressing an unlawful preference for women in its employment/hiring practices and/or devoting funds specifically for the purpose of increasing the enrolment of women.⁶²
 - a. **“The Faculty Incentive Fund** helps make it possible for departments and schools to make incremental appointments of qualified individuals who would bring diversity to the faculty; this can include minority scholars and (in disciplines in which they are underrepresented) *women* scholars.”⁶³
 - b. **Gabilan Provost’s Discretionary Fund** stipulates that “there are resources available for the recruitment and retention of faculty in the sciences and engineering, *particularly women* faculty.”
 - c. **Target of Opportunity** is a mechanism whereby “women and minorities” may be granted an exemption from the standard appointment process. “Faculty search committees are required to engage in a rigorous effort to identify qualified *women* and minority candidates ...

⁶¹ “The compliance review regulations afford OCR broad discretion to determine the substantive issues for investigation and the number and frequency of the investigations” (Case Processing Manual, p. 20). OCR must use its discretion in a manner which maximizes its opposition to civil rights violations against men, consistent with the intentionality of Supreme Court doctrine. If OCR chooses to narrow the scope of its discretion, OCR must state the reasons behind the decision. Please note that OCR is already using its discretion to launch compliance reviews against institutions that allegedly engage in discrimination against women. Therefore, OCR’s refusal to launch compliance reviews to combat discrimination against men (while launching such reviews to combat alleged discrimination against women) may be interpreted as hostility to the rights of men as a class, actionable under Title IX.

⁶² <https://facultydevelopment.stanford.edu/recruitment/recruitment-programs>

⁶³ Stanford does not offer any affirmative action appointments for men in the disciplines wherein they are underrepresented. The only male-only programs are athletic scholarships, but these are balanced by female-only athletic scholarships – which is beyond the scope of this complaint.

Occasionally a department or school identifies without a search a truly exceptional individual who would greatly enrich its faculty; e.g., by bringing uniquely outstanding scholarship and/or diversity to the department. In such "target of opportunity" cases, a search waiver may be requested from the Provost." This waiver violates the plain language of Title IX.

- d. **Provost's Task Force on Women in Leadership** violates Title IX because it explicitly charges Stanford University with the mission of increasing female recruitment, as opposed to a merit-only approach.⁶⁴ This is despite the fact that "the majority of male leaders and just under half of female leaders report being discouraged" (Appendices, p. 4), i.e. Stanford admits that men are more likely than women to be discouraged from administrative leadership positions.
- e. **Recruitment Support** violates Title IX because it offers resources to female applicants, but not male applicants.⁶⁵

2. **Stanford University** violates Title IX by endorsing and collaborating with external programs which express an unlawful preference for women.⁶⁶

- a. To summarize: "Stanford University is committed to increasing significantly the opportunities for minority, *women* and disabled people to engage in business with the University." Moreover: "The classes covered by this policy, as defined by the Federal Government, include ... *women of all racial/ethnic backgrounds.*"^{67,68}
- b. These programs receive significant assistance from the University: " ... a long-range plan to enhance Stanford's external affirmative action ... judicious use of the University's financial and other resources."
- c. Here, injunctive relief would consist of removing this unlawful preference for women.

⁶⁴ https://provost.stanford.edu/wp-content/uploads/sites/4/2016/12/Appendices_WomeninLeadership.pdf

⁶⁵ *Requests may include students of an ethnicity that is underrepresented in an academic field; women who are underrepresented in a field; or people who would be the first members of their family to attend graduate school.* <https://vpge.stanford.edu/fellowships-funding/recruitment-support>

⁶⁶ <https://facultydevelopment.stanford.edu/recruitment/recruitment-programs>

⁶⁷ <https://adminguide.stanford.edu/chapter-5/subchapter-5/policy-5-5-1>

⁶⁸ This allegation does not cite Title VI violations.

3. **Stanford Business School** violates Title IX by perpetrating an unlawful preference for women in the distribution of financial aid.⁶⁹ Adam Allcock, a Stanford student, analysed the data for a nine-year period and found consistent anti-male bias.⁷⁰ There is an internal bias report which explains the discrimination in question in great detail: “Male students were given a Pkg Plan/Tier -9.33 lower than their female classmates, which as seen above leads to statistically significant lower GSB Fellowships (\$-6,993.87)” (**Attachment B, p. 79**). The discriminatory gap is significant enough [men receive \$6,993.87 less than women in average] to warrant federal inquiry. The discrimination is systemic and continuous, i.e. ongoing for at least nine years, with no evidence of amelioration at present.
4. Stanford University violates Title IX by funding/endorsing a **Feminist, Gender, and Sexuality Studies**. While the *overall effect* is hostile, I propose the following criteria for analysis.
- a. There is no Men’s Studies program at Stanford University.⁷¹
 - b. The program’s emphasis on “feminism” augments an inference of bias. “Feminism” is defined as “organized activity on behalf of women's rights and interests.”⁷² Moreover, women who strongly identify as feminists are more likely to sacrifice men in ethical dilemmas, according to sociological studies on the subject.⁷³
 - c. The mission statement and learning objectives explicitly stipulate “feminism,” which means that any individual who does not subscribe to feminist ideology cannot attend

⁶⁹ “It’s hardly surprising that Stanford would funnel more scholarship dollars to women and domestic applicants. Business schools have been encouraging more women to apply to MBA programs and have largely used scholarship grants to increase female enrollment.”

<https://poetsandquants.com/2017/11/30/stanford-gsb-misled-students-on-financial-aid/>
⁷⁰ <https://www.wsj.com/articles/meet-the-student-whistleblower-who-pushed-stanford-to-rethink-financial-aid-1517425678>

⁷¹ The creation of a Men’s Studies program is not a hypothetical request and there are many intellectuals and activists who would be interested in teaching gender issues from this perspective. These activists believe their perspectives are distinct enough to constitute a separate branch, instead of integration into current Women’s Studies curriculum. We can file a formal petition with Stanford University to create such a program and submit a preliminary curriculum, if required.

⁷² <https://www.merriam-webster.com/dictionary/feminism>

⁷³ See, e.g., van Breen, Jolien A et al. “Subliminal Gender Stereotypes: Who Can Resist?” *Personality & social psychology bulletin* 146167218771895.

To quote: “We found that subliminal exposure to stereotypes (vs. counter-stereotypes) led *women who identify relatively strongly with feminists*, but less strongly with women, to (a) persist in a math task, (b) show increased willingness to sacrifice men in a Moral Choice Dilemma task, and (c) show implicit in-group bias on an evaluative priming task” (abstract). The moral dilemma involves loss of life: “In four scenarios, participants are asked to sacrifice a man to save several others (of unspecified gender), and in four other scenarios they are asked to sacrifice a woman.”

this program (nor teach at the program).⁷⁴ This creates an unlawful chilling effect upon the First Amendment rights of prospective students/scholars.

- d. Men are severely underrepresented among the professoriate (7/67).⁷⁵ Men are severely underrepresented among current graduate students (1/14)⁷⁶ and alumnae (4/43).⁷⁷
- e. According to their Facebook page, all past speakers have been women.⁷⁸ The only reference to men on their Facebook publications involves the following phrase: “Men’s Violence Against Women.”⁷⁹ This language stereotypes men as violent, which has both a dissuasive effect on male victims and a prejudicial effect on accused men.
- f. All past events were preoccupied with women’s issues only, which creates a hostile/dissuasive effect against male participants. A quick survey reveals that every single event on their agenda involved either women or GLBT groups. The words “man” and “male” do not even appear among the events organized by the program.⁸⁰
- g. A quick survey of course offerings makes it clear that the department has never offered a single class that focuses on gender issues unique to men: every single course offered in 2018-19 focuses on “women” or GLBT groups. The word “man” does not even appear among course offerings.⁸¹
- h. On 7 November 2018, the program shall host a speaker who is an expert on the “recruitment and retention of *women*, GLBT, and racial/ethnic minority persons in STEM degree programs.”⁸² This allegation is also relevant in terms of assessing *Allegation 1*.

⁷⁴ <https://exploreddegrees.stanford.edu/schoolofhumanitiesandsciences/feministstudies/>

⁷⁵ <https://feminist.stanford.edu/people/faculty>

⁷⁶ <https://feminist.stanford.edu/people/graduate-students/grid>

⁷⁷ <https://feminist.stanford.edu/people/alumni/directory>

⁷⁸ <https://www.facebook.com/stanford.feministstudies?ref=hl>

⁷⁹ <https://www.facebook.com/stanford.feministstudies/photos/a.211585882315675/1135489939925260/?type=3&theater>

⁸⁰ <https://feminist.stanford.edu/events/past-events>

⁸¹ <https://feminist.stanford.edu/courses/search>

⁸² <https://feminist.stanford.edu/events/professional-cultures-and-inequality-stem>

5. Stanford University violates Title IX by funding/endorsing the **Clayman Institute for Gender Research**.⁸³ While the *overall effect* is hostile, I propose the following criteria for analysis.

- a. The current director, Shelley J. Correll, has engaged in advocacy exclusively on behalf of women throughout her career.⁸⁴ There are no prominent members who have engaged in any real sense of advocacy on behalf of men. Moreover, all past and present directors of the Center have been women.⁸⁵
- b. There is only one male among the Center's fellowship recipients (1/41).⁸⁶ All senior scholars are women.⁸⁷ There is only one male in the Advisory Council (1/21).⁸⁸ All staff members are women.⁸⁹ All interns are women.⁹⁰
- c. Their agenda is preoccupied with women's issues only.⁹¹ For example, the upRising magazine devotes itself entirely to women's issues.⁹² All news/events involve women and their rights.⁹³ All research publications are about women and their rights.⁹⁴ This means that all funding received by the Institute flows to female researchers whose exclusive focus is creating benefits/advantages to women.
- d. Speakers are overwhelmingly women. In the rare circumstance that men are invited or invoked, the Center carefully chooses individuals who will perpetuate hostile sexual stereotypes against men while carefully suppressing any realistic discussion of men's civil rights: *"...these dominant characteristics of masculinity go hand and hand with violence, sexual aggression and sexual assault. When men are taught that dominance and aggression are valued, an extreme manifestation of that is what he calls "gender based violence," or men committing violence against women. It also means that when men commit such violence, it is largely unremarkable, given its alignment with dominant values and*

⁸³ <https://gender.stanford.edu/>

⁸⁴ <https://gender.stanford.edu/people/director>

⁸⁵ <https://gender.stanford.edu/people/director>

⁸⁶ <https://gender.stanford.edu/people/fellows>

⁸⁷ <https://gender.stanford.edu/people/senior-scholars>

⁸⁸ <https://gender.stanford.edu/people/advisory-council>

⁸⁹ <https://gender.stanford.edu/people/staff>

⁹⁰ <https://gender.stanford.edu/join-us/internships>

⁹¹ <https://gender.stanford.edu/research/breaking-culture-sexual-assault>

⁹² <https://gender.stanford.edu/news-publications/uprising>

⁹³ <https://gender.stanford.edu/news-publications/gender-news>

⁹⁴ <https://gender.stanford.edu/news-publications/research-publications>

expectations of men."⁹⁵ Such claims have no basis in reality.⁹⁶ Injunctive relief would consist of striking down such stereotyping language and compelling Stanford to address the issue of female perpetrators.

e. There is no similar program for men at Stanford.

6. Stanford University violates Title IX by funding/endorsing the **Women's Community Center**.⁹⁷ While the *overall effect* is hostile, I propose the following criteria for analysis.

a. The name refers to women, but not men.

b. There is no Men's Community Center at Stanford.

c. All staff members are women. All student coordinators are women except one person who is possibly male (18/19).⁹⁸ One subsection stipulates that membership for graduate students is limited to women.⁹⁹

d. Their agenda is preoccupied with women: feminist discussion nights, feminist narratives, Stanford women's leadership conference, women in STEM.¹⁰⁰ A discussion of career options refers to *women*.¹⁰¹

e. *The Get Involved* restricts membership on the basis of sex by inviting Stanford affiliates to "become involved in the women's community here at Stanford."¹⁰² The

⁹⁵ <https://gender.stanford.edu/news-publications/gender-news/men-masculinity-and-persistent-nature-gender-inequality>

⁹⁶ Stemple, Lara, and Meyer, Ilan H. "The Sexual Victimization of Men in America: New Data Challenge Old Assumptions." *American Journal of Public Health* 104.6 e19-26. To quote: "The number of women who have been raped (1 270 000) is nearly equivalent to the number of men who were "made to penetrate" (1 267 000). As Figure 1 also shows, both men and women experienced "sexual coercion" and "unwanted sexual contact," with women more likely than men to report the former and men more likely to report the latter" (p. 3). Stemple, et al. "Sexual Victimization Perpetrated by Women: Federal Data Reveal Surprising Prevalence." *Aggression and Violent Behavior*, vol. 34, 2017, pp. 302-311. To quote: "We looked at perpetration against both male and female victims. We examined four surveys conducted in-dependently by the Centers for Disease Control and Prevention (CDC) and the Bureau of Justice Statistics (BJS) in 2008 through 2013 (Table 1). Ours is the first study to examine together large federal data sets, obtained from nationally representative samples (except in the case of inmates). Together these surveys have reached many tens of thousands of people, and each has shown internally consistent results over time. We therefore believe that this article provides more definitive estimates about the prevalence of female sexual perpetration than has been provided in the literature to date. Taken as a whole, the reports we examine document surprisingly significant prevalence of female-perpetrated sexual victimization, mostly against men and occasionally against women. The findings are sufficiently robust so as to compel a re-thinking of long-held stereotypes about sexual victimization and gender" (p. 1).

⁹⁷ <https://wcc.stanford.edu/>

⁹⁸ <https://wcc.stanford.edu/about-us>

⁹⁹ <https://wcc.stanford.edu/grad-women>

¹⁰⁰ <https://wcc.stanford.edu/events/upcoming-events>

¹⁰¹ <https://wcc.stanford.edu/women-at-work>

¹⁰² <https://wcc.stanford.edu/get-involved>

Community Center also violates the First Amendment by imposing political restrictions upon prospective applicants: “if you have a strong interest in social justice, equity and *women’s rights*, we encourage you to apply.”

- f. The Center hosts a subsection called “Masculinities Project.” However, a quick survey of their materials makes it clear that they perpetuate negative stereotypes about men. The default assumption of these programs is that masculinity is inherently evil and toxic and violent. Catchphrases include “violence intervention” and “locker room talk?” and “taking off the mask” and “women in business” and “sexual assault prevention.”¹⁰³ Put in other words, the general impetus of these programs is to harass and demoralize young men based on ideological assumptions, i.e. portraying men as inherently violent oppressors and women as morally infallible victims. None of these programs offers men support for its own sake. Far from alleviating the hostile environment, these programs contribute to the overall anti-male prejudice.
 - i. For example, an external program that receives funding/sponsorship from the Center is called “A Call to Men.” The program’s description runs thus: “violence prevention organization focused on issues of manhood, *male socialization and its intersection with violence, and preventing violence against all women and girls.*” The language used in the description clearly indicates that “A Call to Men” is hostile to men socializing with each other; the language also erases the very possibility of female violence.

7. Stanford University violates Title IX by funding/endorsing the **WISE (Women in Science and Engineering)** program.¹⁰⁴

- a. The name is exclusionary.
- b. There is no equivalent program for male STEM majors.
- c. The mission statement explicitly refers to women and seeks to advance their benefits: “to reduce isolation of women in STEM” and “increase the success of women.”
- d. The leadership consists of women only.¹⁰⁵

¹⁰³ <https://wcc.stanford.edu/masculinities/events>

¹⁰⁴ <https://wise.stanford.edu/>

¹⁰⁵ <https://wise.stanford.edu/about/leadership>

- e. WISE has a section devoted to “Celebrating Stanford Women in Science and Engineering.”¹⁰⁶ Stanford has no such program for celebrating men in the fields wherein they are underrepresented.
8. Stanford University violates Title IX by funding/endorsing the **WISSH (Women in Social Sciences and Humanities)** program.¹⁰⁷
- a. There is little data available to the public, but information suggests that WISSH is identical to WISE, except being applicable to the social sciences and Humanities instead. As such, all allegations in the previous paragraph (Allegation 7) are incorporated herein.
 - b. WISSH is open to women only.¹⁰⁸
 - c. Stanford has no equivalent program for men.
9. **Stanford Women in Business** violates Title IX.¹⁰⁹
- a. The name is exclusionary.
 - b. All team members are women (37/37).¹¹⁰
 - c. The plain language of the Young Women’s Leadership Summit discriminates against men.¹¹¹
 - d. Stanford offers no similar program for men.
10. **MWare Women’s Leadership Innovation Lab [WLIL]** violates Title IX.¹¹²
- a. The name is exclusionary.
 - b. All team members are women (15/15).¹¹³ While there are several men interspersed among the female majority in the advisory board, the advisory board clearly has secondary importance.
 - c. A job application to WLIL violates the First Amendment rights of prospective applicants because it demands “strong interest in participating in the Lab’s mission of

¹⁰⁶ <https://wise.stanford.edu/research-resources/celebrating-stanford-women-science-and-engineering>

¹⁰⁷ <https://vpge.stanford.edu/events/programs/wise-and-wissh-groups-women>

¹⁰⁸ “Welcome to the sign-up page for WISSH (Women in Social Sciences and Humanities) groups! These groups meet once a week for an hour and a half. They are open to **female PhD students** and post-docs in designated departments at Stanford.” <http://wissh2010.questionpro.com/>

¹⁰⁹ <http://www.stanfordwomeninbusiness.com/>

¹¹⁰ <http://www.stanfordwomeninbusiness.com/team/>

¹¹¹ <http://www.stanfordwomeninbusiness.com/summit>

¹¹² <https://womensleadership.stanford.edu/>

¹¹³ <https://womensleadership.stanford.edu/people>

advancing women's leadership."¹¹⁴ This requirement creates an unlawful *preference*, prohibited under Title IX.

- d. A subprogram of WLIL, **Seeds of Change**, is clearly discriminatory against men as a class. The plain language is discriminatory ("we aim to provide *young women and girls* with a foundation ... training and support to *young women* in STEM") and all recipients in a recent picture were women.¹¹⁵
- e. WLIL distributes a substantial amount of financial aid: for example, it has received \$15 million from Stanford.¹¹⁶
- f. Stanford offers no similar program for men.

11. Stanford Faculty Women's Forum violates Title IX.^{117,118}

- a. The name is exclusionary.
- b. All executives are women.¹¹⁹
- c. All past events were about women.¹²⁰ The language of these events is clearly discriminatory: "all faculty *women* and *emeritae* are invited to participate in this annual fall reception (come during any part of the time that your schedule permits), and meet and welcome Stanford's newest *women faculty*."¹²¹
- d. Stanford has no faculty forum for men.

12. GME Women in Medicine Council violates Title IX.¹²²

- a. The name is exclusionary.
- b. The plain language is discriminatory ("participants are limited to *Stanford or Stanford-affiliated women* in medicine"). Also, all members are women, as can be understood from the homepage picture.¹²³
- c. Their publication agenda is preoccupied with women's issues only.¹²⁴

¹¹⁴ <https://stanford.app.box.com/s/brcuq2kl3501h5w6bk59yw4se1jkjmba>

¹¹⁵ <https://womensleadership.stanford.edu/seedschange>

¹¹⁶ <https://vpge.stanford.edu/news/stanford-creates-innovation-lab-advance-women>

¹¹⁷ OCR has launched a very similar investigation against a very similar program [Women's Faculty Forum] at Yale University [Docket #01-18-2031].

¹¹⁸ <https://facultydevelopment.stanford.edu/faculty-networks/faculty-womens-forum/about-stanford-faculty-womens-forum-fwf>

¹¹⁹ *Ibid.*

¹²⁰ <https://facultydevelopment.stanford.edu/faculty-networks/faculty-womens-forum/past-fwf-events>

¹²¹ <https://facultydevelopment.stanford.edu/events/faculty-womens-forum-fall-welcome-reception-1>

¹²² <https://med.stanford.edu/gme/wim.html>

¹²³ <https://med.stanford.edu/gme/wim.html>

¹²⁴ <https://med.stanford.edu/gme/wim.html#articles>

d. Stanford has no such council for men.

13. Global Women in Data Science violates Title IX.¹²⁵

- a. The name is exclusionary.
- b. Women are overrepresented among 2018 WiDS ambassadors (122/130).¹²⁶ At any rate, WiDS assumes that they are women by default: “they are in their regions, supporting *women* who are currently in the field, and inspiring *other women* to become data scientists.”¹²⁷
- c. While WiDS has a weak and self-contradictory anti-discrimination clause,¹²⁸ the program’s agenda spells out the discrimination against men.¹²⁹
- d. All speakers in a 2018 conference (16/16) were women.¹³⁰
- e. Stanford offers no similar program for men (even in the academic fields wherein they are underrepresented).

14. Stanford Business Executive Program for Women Leaders violates Title IX.¹³¹

- a. The name is exclusionary.
- b. The plain language is discriminatory. Participants are required to be “senior female leaders.”¹³²
- c. Stanford offers no similar support program for men.

15. Women on Boards Initiative violates Title IX.¹³³

- a. The name is exclusionary.
- b. Membership is for women only. This is explicit.¹³⁴
- c. Stanford offers no similar support program for men.

¹²⁵ <https://www.widsconference.org/about2019.html>

¹²⁶ <https://www.widsconference.org/ambassadors.html>

¹²⁷ *Ibid.*

¹²⁸ “The Global Women in Data Science (WiDS) Conference aims to inspire and educate data scientists worldwide, *regardless of gender*, and **support women** in the field. *All genders are invited to participate in the conference*, which features **outstanding women** doing outstanding work.” This disclaimer is self-contradictory and meaningless.

¹²⁹ “The best way to see more women in STEM fields is to make the ones already there more visible, according to this week’s **all-female panel** on Techopia Live ... **women from all walks of life** came to Microsoft New England R&D (NERD) Center ... careers in technology fields can offer financial freedom to **women around the world** ... Women in Data Science (WiDS) is a global event that encourages **more women** into the field of data science” <https://www.widsconference.org/news.html>

¹³⁰ <https://www.widsconference.org/videos.html>

¹³¹ <https://www.gsb.stanford.edu/exec-ed/programs/executive-program-women-leaders>

¹³² *Ibid.*

¹³³ <https://www.gsb.stanford.edu/alumni/communities/womens-programs/stanford-women-boards-initiative>

¹³⁴ “Stanford Women on Boards Membership Criteria: if you are a Stanford *alumna* [*feminine noun in Latin*] with board experience (corporate, public sector, or non-profit), then you qualify for membership in Stanford Women on Boards (*Ibid.*).

16. Women in Stanford Law violates Title IX.¹³⁵

- a. The name is exclusionary.
- b. Membership is for women only. This is explicit: "...an organization *run for and by women* at Stanford Law School." Also, all board members are women (Nicole, Olivia, Serena, Melissa, Liz, Willa, Rachel, Lori, Marjory, Marika).¹³⁶
- c. Their agenda is preoccupied with women's issues only. The words "men" and "male" do not even occur on their agenda.¹³⁷
- d. These events occur on campus space and receive funding from Stanford.
- e. Stanford offers no similar support program for men.

17. Stanford Women in Design violates Title IX.¹³⁸

- a. The name is exclusionary.
- b. All directors/executives are women (9/9).¹³⁹
- c. The plain language is discriminatory: "SWiD empowers *women*."¹⁴⁰
- d. On information and credible belief, all 175 members are women (according to Facebook and LinkedIn results).
- e. Stanford offers no similar support program for men.

18. Stanford Women's Leadership Conference violates Title IX.¹⁴¹

- a. The name is exclusionary.
- b. All attendees in last year's event were women (55/55).¹⁴²
- c. The plain language is discriminatory.¹⁴³
- d. Stanford offers no similar support program for men.

19. Stanford Women in Politics violates Title IX.¹⁴⁴

- a. The name is exclusionary.

¹³⁵ <https://law.stanford.edu/women-of-stanford-law-wsl/>

¹³⁶ *Ibid.*

¹³⁷ https://law.stanford.edu/events/list/?tribe_paged=1&tribe_event_display=past&tribe_organizers=117426

¹³⁸ <https://web.stanford.edu/group/swid/cgi-bin/wordpress/>

¹³⁹ <https://web.stanford.edu/group/swid/cgi-bin/wordpress/our-team/>

¹⁴⁰ https://web.stanford.edu/group/swid/cgi-bin/wordpress/about_us/

¹⁴¹ <https://wcc.stanford.edu/swlc>

¹⁴² https://wcc.stanford.edu/sites/default/files/swlc_everyone.jpg

¹⁴³ "The conference celebrates women leaders around the world and provides Stanford women with actionable tools to enhance their leadership." <https://wcc.stanford.edu/swlc>

¹⁴⁴ <https://law.stanford.edu/women-in-politics/>

- b. All board members are women (Sarah, Evelyn, Michelle, Nicole, Sophia, Pauline).
- c. The plain language is discriminatory: “SLS Women in Politics is a nonpartisan student-run organization built to assist SLS women in preparation for running for public office ... et cetera.”
- d. Stanford offers no similar support program for men.

20. Stanford Women in Computer Science violates Title IX.¹⁴⁵

- a. The name is exclusionary.
- b. All board members are women (21/21).
- c. The plain language is discriminatory: “We work to promote and support the *growing community of women* in CS and technology.”
- d. Stanford offers no similar support program for men.

21. Stanford Mechanical Engineering Women violates Title IX.¹⁴⁶

- a. The name is exclusionary, all members are women, all speakers are women, and the plain language is discriminatory.¹⁴⁷
- b. Stanford is a sponsor to this program.
- c. Stanford offers no similar support program for men.

22. Stanford Women in Math Mentoring violates Title IX.¹⁴⁸

- a. The name is exclusionary.
- b. The plain language is discriminatory.¹⁴⁹
- c. All board members and participating mentors are women.¹⁵⁰
- d. Stanford offers no similar support program for men.

23. Stanford Women in Management violates Title IX.¹⁵¹

- a. The name is exclusionary, the plain language is discriminatory,¹⁵² and all members are women.

¹⁴⁵ <http://web.stanford.edu/group/wics/>

¹⁴⁶ <https://stanfordmewomen.weebly.com/>

¹⁴⁷ “One of our goals is to address topics which may be of interest to women engineers. Such topics include: professional relationships, planning for a career and family, challenges of breaking into male-dominated fields, finding mentors in the workplace/academia, and opportunities that science and engineering provide for women.”

¹⁴⁸ <http://swimm.stanford.edu/index.html>

¹⁴⁹ <http://swimm.stanford.edu/goals.html>

¹⁵⁰ <http://swimm.stanford.edu/mentors.html>

¹⁵¹ <https://orgsync.com/44951/chapter>

¹⁵² According to their own constitution, “WiM provides opportunities for GSB women to build a professional network and supportive community.” The constitution is available on their website.

- b. Stanford offers no similar support program for men.
- c. There is an internal bias report which claims that Women in Management violates Title IX (**Attachment C, pp. 1-2**).

24. GSB Women’s Circles violates Title IX.¹⁵³ Likewise, **Alumnae Voices** violates Title IX.¹⁵⁴ Both are alumnae associations affiliated with the Graduate School of Business.

- a. The name is exclusionary.
- b. The plain language is discriminatory and all members are women.
- c. The Graduate School of Business does not offer male-only alumni, but it does offer female-only alumnae groups. (Stanford’s primary alumni organization is gender-neutral and thus does not violate Title IX).
- d. There is an internal bias report which claims that GSB Alumnae groups violate Title IX (**Attachment C, p. 3**).

25. Stanford Society of Women Engineers violates Title IX.^{155,156}

- a. The name is exclusionary.
- b. All members are women (26/26).
- c. The plain language is discriminatory.
- d. Stanford offers no similar support program for men.
- e. The program receives significant assistance by using campus space and the Stanford logo, which confers a substantial reputational benefit.

26. Stanford University violates Title IX by offering significant assistance to **Women Leaders in Global Health**.¹⁵⁷

- a. The name is exclusionary.
- b. All members of the Steering Committee are women (62/62).¹⁵⁸
- c. Their agenda is preoccupied with women’s health only.¹⁵⁹
- d. The program aims to support “women in all forms of leadership from local communities to global organisations, from science to politics.”¹⁶⁰

¹⁵³ <https://www.gsb.stanford.edu/alumni/communities/womens-programs/womens-circles>

¹⁵⁴ <https://www.gsb.stanford.edu/alumni/communities/womens-programs/alumnae-voices>

¹⁵⁵ <http://swe.stanford.edu/#about>

¹⁵⁶ Please note that different regional offices of OCR have consistently investigated this program (Women in Engineering) in prior complaints.

¹⁵⁷ <https://www.wlghconference.org/>

¹⁵⁸ <https://www.wlghconference.org/steering-committee/>

¹⁵⁹ <https://www.wlghconference.org/news/>

¹⁶⁰ <https://www.wlghconference.org/2018/sponsorship/>

- e. “Men and women” can join the *audience* (even though the website uses discriminatory language elsewhere). Men are excluded from the Steering Committee (nor can they apply for funding). This is still substantial discrimination.
- f. Stanford sponsors no similar program for Male Leaders in Global Health.
- g. This is an external program which receives significant assistance from Stanford (which is a sponsor). In addition, the Stanford logo confers substantial reputational benefit.¹⁶¹

27. Stanford University violates Title IX by offering significant assistance to **Stanford Professional Women**.¹⁶²

- a. Membership is open to women only.¹⁶³
- b. This is an external program which receives significant assistance from Stanford (which is a sponsor). Also, “many of our events are held at our home on the Stanford campus, the Frances C. Arrillaga Alumni Center.”¹⁶⁴
- c. Stanford does not endorse any similar programs for men.

¹⁶¹ Stanford Medicine is a founding and academic partner. <https://www.wlghconference.org/>

¹⁶² <http://www.stanfordwomen.org/about.html>

¹⁶³ <http://www.stanfordwomen.org/Membership.html>

¹⁶⁴ <http://www.stanfordwomen.org/about.html>

INJUNCTIVE RELIEF

This complaint requests the following injunctive relief, in any reasonable combination thereof:

- The removal of discriminatory language, whenever proper.
- The elimination of affirmative action practices for women, whenever proper.
- The elimination of discriminatory programs within a reasonable time period, whenever proper.
- The conversion of discriminatory programs into gender-neutral programs within a reasonable time period, whenever proper. If such conversion occurs, the names of the programs must be changed into gender-neutral titles, and the programs must begin to actively recruit male students and professors. There is Title IX precedent for such conversion.¹⁶⁵
- The creation of male-specific or male-focused programs and/or scholarships and/or research centers to offset the balance, whenever proper. There is Title IX precedent for the creation of such programs.¹⁶⁶
- Any other form of injunctive relief, whenever proper (such as a future ban on all such programs).

¹⁶⁵ In a previous OCR precedent, the University of Southern California agreed to change the name of the Center for Women and Men (implying a hierarchy of victimhood) into *Relationship and Sexual Violence Prevention Services* (#09-16-2128). The name change had a substantial, positive effect on male participation in the Center.

¹⁶⁶ "Stanford University informed OCR that it has modified the weightlifting program. It has now instituted both "men-focused" and "women-focused" weightlifting hours, which are open to all students regardless of gender. Both weightlifting sessions are open for the same amount of time two times a week. The University submitted documentation to OCR on March 9, 2018 showing their response to the Stanford Daily newspaper article regarding the women's only weightlifting hours" (#09-18-2175). Also attached as **Exhibit D**.

ADDENDUM
(LIST OF DISCRIMINATORY PROGRAMS)

1. Stanford University (*employment/recruitment preferences*)
 - a. The Faculty Incentive Fund
 - b. Gabilan Provost's Discretionary Fund
 - c. Target of Opportunity
 - d. Provost's Task Force on Women in Leadership
 - e. Recruitment Support
2. Stanford University (*employment/recruitment preferences – external affirmative action programs*)
3. Stanford Business School (*financial aid*)
4. Stanford: Feminist, Gender, Sexuality Studies
5. The Clayman Institute for Gender Research
6. Stanford Women's Community Center
7. WISE (Women in Science and Engineering)
8. WISSH (Women in Social Sciences and Humanities)
9. Stanford Women in Business
10. MWare Women's Leadership Innovation Lab [WLIL]
11. Stanford Faculty Women's Forum
12. GME Women in Medicine Council
13. Global Women in Data Science
14. Stanford Business Executive Program for Women
15. Women Boards Initiative
16. Women of Stanford Law
17. Stanford Women in Design
18. Stanford Women's Leadership Conference
19. Stanford Women in Politics
20. Stanford Women in Computer Science
21. Stanford Mechanical Engineering Women
22. Stanford Women in Math Mentoring
23. Stanford Women in Management
24. GSB Women's Circles & Alumnae Voices
25. Stanford Society of Women Engineers
26. Women Leaders in Global Health
27. Stanford Professional Women