



PARTIES

1.                               is a               graduate of Yale College and a  
woman;                               is a student in Yale College, Class of  
and a woman;                               is a student in Yale College, Class of  
and a woman;                               is a               graduate of Yale College  
and a woman;                               is a student in Yale College, Class of  
and a woman;                               is a member of the faculty of Yale  
University with responsibility for teaching and a man. All  
plaintiffs are citizens of the United States. Yale University is  
a corporation organized under a charter granted by the State of  
Connecticut. It is an institution of higher education which re-  
ceives Federal financial assistance.

2. The plaintiffs bring this suit on behalf of themselves  
and all other similarly situated persons, pursuant to Rule 23 of  
the Federal Rules of Civil Procedure. The class is the class of  
those students and faculty at Yale University who are disadvantaged  
and obstructed in their educational relations by the policies,  
practices, acts and omissions of the University with respect to  
the sexual harassment of women students by men in positions of  
authority, in particular by male faculty members and administrators.  
There are three subclasses:

1. The class of all female students sexually harassed by men  
in positions of authority at Yale, including all female students  
who, since 1973, at present and in the future, have to choose

between toleration of, or compliance with, sexual demands and pressures by such men and any educational opportunity, benefit or chance to grow or advance educationally;

2. The class of female students who, since 1973, at present and in the future, are subject to the discriminatory atmosphere adverse to their educational development created by the practice of such sexual harassment, including but not limited to all students who have pursued complaints of sexual harassment and attempted to produce appropriate action by defendant, to their detriment;

3. The class of all faculty members whose professional effectiveness in teaching and in engaging in the pursuit of knowledge with students is seriously impaired by that contamination of the faculty/student relationship created by defendant's tolerance of said sexual pressures, which tolerance creates detrimental distraction in women students and generates an atmosphere of distrust uncondusive to teaching and learning.

The class is so numerous that joinder of all members is impractical. There are questions of law or fact common to the class. The defendant has acted or refused to act on grounds generally applicable to the class. The class is fairly and adequately represented by plaintiffs herein.

COUNT I

1. Plaintiff Alexander entered Yale as an undergraduate in September, 1973.

2. At the time she came to Yale, plaintiff was a serious musician who anticipated majoring in music and playing the flute professionally.

3. In her first semester, plaintiff enrolled in the maintained by defendant for undergraduates interested in performing music, and took private flute lessons with the, an employee of defendant.

4. repeatedly made sexual advances, including coerced sexual intercourse, that were not wanted, and were protested, by plaintiff.

5. persisted in his intimidation and coercion of plaintiff, including sexual advances to her, continuing into May, 1977.

6. As a direct result of s sexual demands, plaintiff found it impossible to continue playing the flute and abandoned her study of the instrument, thus aborting her desired professional career.

7. As a direct result of s sexual demands, plaintiff, contemplated suicide and almost dropped out of Yale, both in December, 1974.

8. At the time of the said incidents, and again in May, 1977,

plaintiff 'attempted' to complain to responsible Yale officials. On both occasions, she was discouraged and intimidated by unresponsive administrators and complex and ad hoc methods which inadequately substitute for a formal and legitimate administrative structure for complaints.

9. The experience of plaintiff as set forth above is the result of a pattern, practice, and policy of defendant, its officers, agents, and employees, of neglecting and refusing to consider seriously complaints of sexual harassment of women students, with the effect of actively condoning continued sexual harassment of female students by male faculty members and administrators.

10. The above actions and policies of defendant and its agents and employees discriminate against plaintiff and members of her class on the basis of sex, in violation of 20 U.S.C. §1681.

COUNT II

1. Plaintiff Reifler entered Yale as an undergraduate in September, 1976.

2. In Fall Term, 1976, plaintiff became manager of the team.

3. In the course of her duties as manager, plaintiff worked with the coach of the team,

4. During the season, plaintiff, was sexually harassed by while she was doing tasks that were her responsibility as manager of the team.

5. As a direct result of said sexual harassment, plaintiff suffered distress and humiliation, was distracted from her academic studies, was hampered in her work as team manager, and was denied recognition due her as team manager, all to her educational detriment.

6. Plaintiff wanted to complain to responsible authorities of defendant about said sexual harassment but was intimidated by the lack of legitimate procedures and was unable to determine if any channels for complaint about sexual harassment were available to her.

7. The experiences of plaintiff, set forth above is the result of a pattern, practice, and policy of defendant, its officers, agents and employees, of neglecting and refusing to process and consider seriously complaints of sexual harassment of women students, with the effect of actively condoning continued sexual harassment of female students by male faculty members and administrators.

8. The above actions and policies of defendant and its agents and employees discriminate against plaintiff and members of her class on the basis of sex, in violation of 20 U.S.C. §1681.

COUNT III

1. Plaintiff Price entered Yale as an undergraduate in September, 1974.

2. In the Fall Term, 1975, plaintiff declared her major field to be

3. In the Spring Term, 1976, plaintiff enrolled in  
taught by Professor  
then an employee of defendant.

4. Early in June, 1976, when plaintiff went to Professor office to submit her final paper for the course, she was sexually propositioned by Professor who offered to give her a grade of "A" in the course in exchange for her compliance with his sexual demands. He also remarked upon the effect of her physical appearance on him.

5. Plaintiff explicitly rejected and refused to comply with Professor sexual demands and left his office.

6. Shortly after said incident, plaintiff complained about it orally and in writing to responsible officials of defendant, including her college dean and the then director of the

7. At the time these complaints were made, she was told by responsible officials of defendant that nothing could be done to remedy her situation.

8. At the time of the plaintiff's complaints, no investiga-

tion of the incident was made nor was disciplinary action taken against Professor [redacted] by defendant or by any of its responsible officers.

9. Plaintiff [redacted] later received a grade of "C" in the course. The grade was not the result of a fair evaluation of her academic work, but the result of her failure to accede to Professor [redacted] sexual demands.

10. As the direct result of her explicit rejection of said sexual propositions, plaintiff [redacted] suffered educational detriment. She has suffered distress, humiliation, has received a grade on her transcript that does not reflect the quality of her academic performance, and has been injured, and is continuously being injured, in her educational advancement and in the further pursuit of her career.

11. In September, 1977, responsible officers of defendant requested that plaintiff [redacted] re-submit her complaint about the incident, which she did later in September, 1977.

12. After said resubmission, no investigation of the incident of sexual harassment was made, nor has the grade been changed.

13. Responsible officials of defendant have represented to plaintiff that nothing further will be or can be done about her complaint.

14. The experience of plaintiff [redacted] set forth above is the result of a pattern, practice, and policy of defendant, its offi-



cers, agents and employees, of neglecting and refusing to process and consider seriously complaints of sexual harassment of women students, with the effect of actively condoning continued sexual harassment of female students by male faculty members and administrators.

15. The above actions and policies of defendant and its agents and employees discriminate against plaintiff and members of her class on the basis of sex, in violation of 20 U.S.C. §1681.

COUNT IV

1. Plaintiff Stone entered Yale as an undergraduate in September, 1974.

2. During the course of the academic years 1974-1975, plaintiff best friend, another Yale undergraduate woman, became the subject of sexual pressures and attentions from an employee of defendant, and she discussed said incidents with plaintiff in the academic years 1974-1975 and 1976-1977.

3. Both the incidents themselves and the atmosphere in which they occurred caused plaintiff great emotional distress, but there was no established, legitimate procedure by which she could bring them to the attention of the responsible officials of defendant.

4. As a result of the said incidents and the absence of an established procedure by which she could bring them to the attention of responsible officials of defendant, plaintiff suffered emotional distress, was deprived of the tranquil atmosphere necessary to her pursuit of a liberal education, and was put in fear of her own associations with men in positions of authority at Yale.

5. The experience of plaintiff as set forth above is the result of a pattern, practice, and policy of defendant, its officers, agents, and employees, of neglecting and refusing to consider seriously complaints of sexual harassment of women students, with the effect of actively condoning continued sexual harassment of female students by male faculty members and administrators.

6. The above actions and policies of defendant and its agents and employees discriminate against plaintiff and members of her class on the basis of sex, in violation of 20 U.S.C. §1681.

COUNT V

1: Plaintiff Olivarius entered Yale as an undergraduate in September, 1973.

2. During the academic year 1976-1977, plaintiff was an officer of the

3. In this capacity, plaintiff had occasion to discuss with other female students their complaints about the quality of the education of women at Yale, including complaints of sexual harassment.

4. Plaintiff attempted to pursue such complaints, both formally and informally, with responsible officials of defendant.

5. In her attempts, plaintiff met with delays, aggressive uninterest, hostility and intransigence.

6. As a direct result of the lack of established procedures for recognizing and handling such complaints, plaintiff was forced to expend time, effort and money in investigating complaints herself, preparing them to be presented to responsible officials of defendant, and attempting to negotiate the complexities of ad hoc "channels." She was subjected to threats and intimidation from individuals involved in her investigations and was being given no protection or encouragement by responsible officials of defendant.

7. The experience of plaintiff as set forth above is the result of a pattern, practice, and policy of defendant, its officers, agents, and employees, of neglecting and refusing to consider seriously complaints of sexual harassment of women students, with the effect of actively condoning continued sexual harassment of female students by male faculty members and administrators.

8. The above actions and policies of defendant and its agents and employees discriminate against plaintiff, and members of her class on the basis of sex, in violation of 20 U.S.C.

◇ §1681.

COUNT VI

1. Plaintiff Winkler came to Yale as an Assistant Professor in the \_\_\_\_\_ in July, 1974.

2. During his career at Yale, he has had responsibility for teaching undergraduates.

3. Early in the academic year 1974-1975, one of plaintiff's female students discussed with him the sexual harassment to which her best friend, a \_\_\_\_\_ major, was subjected by a male professor then in the \_\_\_\_\_

4. As a result of this discussion, plaintiff \_\_\_\_\_ became aware of the problem of sexual pressure put on women students by male faculty members.

5. Plaintiff \_\_\_\_\_ further became aware of the obstruction of his own teaching relations with women students, on account of the atmosphere of distrust male professors engendered by the reputation of certain male professors for sexually harassing women students.

6. Plaintiff \_\_\_\_\_ has been unable to take any steps to alleviate the pressure this atmosphere places on his students, as there are no established procedures for bringing complaints of sexual harassment of women students by male professors and administrators to the attention of responsible officials of defendant.

7. As a result of the traumatic effects of the atmosphere of sexual pressure and demands upon women students and the absence

of established procedures for bringing complaints to the attention of responsible officials of defendant, plaintiff has had to try to teach in an atmosphere poisoned by distrust, and he has further been deprived of the benefit of teaching students who can devote their concentration to study and the student/teacher relationship.

8. The experience of plaintiff as set forth above is the result of a pattern, practice, and policy of defendant, its officers, agents, and employees, of neglecting and refusing to consider seriously complaints of sexual harassment of women students, with the effect of actively condoning continued sexual harassment of female students by male faculty members and administrators.

9. The above actions and policies of defendant and its agents and employees, which have the effects on plaintiff set forth above, are the result of discrimination on the basis of sex, in violation of 20 U.S.C. §1681.

WHEREFORE, plaintiffs claim:

1. A declaration that the policies and practices of defendant, its officers, agents, and employees with respect to sexual harassment of women students are in violation of 20 U.S.C. §1681;

2. An order permanently enjoining defendant, its officers, agents, employees, successors, assigns and all persons in active concert or participation with them from engaging in practices and

implementing policies which discriminate on the basis of sex in educational opportunity;

3. An order permanently enjoining defendant from failing to have an established, legitimate mechanism for receiving, investigating, and adjudicating complaints of sexual harassment of women students;

4. An order permanently enjoining defendant, its officers, agents, and employees from failing to take appropriate disciplinary action against

5. An order permanently enjoining defendant, its officers, agents, and employees from failing to take appropriate disciplinary action against

6. An order permanently enjoining defendant, its officers, agents, and employees from failing to take appropriate disciplinary action against

7. An order requiring defendant to institute and continue a mechanism for receiving, investigating, and adjudicating complaints of sexual harassment, to be designed and implemented under the supervision of this Court;

8. A preliminary order, requiring defendant not to discontinue any efforts it is making to investigate and change plaintiff grade in the course,

9. A preliminary order, requiring defendant to instruct recipients of plaintiff transcript to disregard the course, and the grade therein;

10. A preliminary order, requiring defendant to include the receiving and investigating of complaints of sexual harassment in the function of the office of the Dean of Women;

11. Compensatory damages in the amount of five hundred dollars (\$500.00) for plaintiff

12. Attorney's fees and the costs of this action;

13. Such other and further relief as this Court deems necessary and proper.

**PLAINTIFFS**

BY

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**Their Attorney**

Dated: November 16, 1977