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## **Statement of Gloria Allred**

Recently a number of young women contacted me about what they allege was inappropriate sexual harassment and misconduct by Dr. George Tyndall, a gynecologist, who was assigned to examine and treat them when they were students at the University of Southern California (U.S.C.).

Today, we are filing a lawsuit against U.S.C. on behalf of one of those students and we are also calling on U.S.C. to conduct an independent investigation of the very serious allegations made by these students who allege that for many years U.S.C. knew of inappropriate conduct by Dr. Tyndall, but failed to take appropriate measures to protect innocent students who were under his care.

The lawsuit which we have filed this morning against Dr. Tyndall and U.S.C. is on behalf of Danielle Mohazab. Danielle was given an appointment to see Dr. Tyndall because her regular gynecologist at U.S.C. was not available. Her appointment with Dr. Tyndall on April 4, 2016 was for the purpose of discussing medication and for a sexually transmitted disease test.

Danielle will provide details of the sexual harassment to which she alleges she was subjected and also the remarks made to her which contain stereotypes about women who are Filipina.

She will also describe the inappropriate, harmful, and offensive manner in which she alleges that Dr. Tyndall conducted the STD examination of her vaginal area which left Danielle feeling confused and violated.

As a result of Dr. Tyndall's misconduct and U.S.C.'s failures to protect Danielle, today we filed a lawsuit against Dr. Tyndall and U.S.C. in Los Angeles County.

We allege:

1. SEXUAL BATTERY IN VIOLATION OF CAL. CIV. CODE § 1708.5
2. BATTERY
3. GENDER VIOLENCE IN VIOLATION OF CAL. CIV. CODE § 52.4
4. NEGLIGENT HIRING AND RETENTION
5. NEGLIGENCE [FAILURE TO PROVIDE STD EXAM DEVOID OF SEXUALLY HARASSING AND/OR SEXUALLY ASSAULTING CONDUCT]
6. FRAUDULENT MISREPRESENTATION
7. NEGLIGENT MISREPRESENTATION
8. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
9. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

We are seeking compensation and punitive damages according to proof at trial.

Danielle has demonstrated tremendous courage by coming forward and file this lawsuit and allowing her name to be used in pursuing it even though it involves a discussion of what is private sexual and intimate issues.

She has been willing to make this public because she feels it is important and she wants other young women to know that she and they were innocent victims. They are not to blame. Instead it is Dr. Tyndall and U.S.C. which must be held accountable.

This series of events also raises the important questions of what did U.S.C. know and when did they know it. Some of the answers to these questions have been provided to me by a former U.S.C. student who wishes to maintain privacy,

and I will call her Jane Doe. She has provided me with a declaration which states the following:

“I was a student at the University of Southern California (“USC”) from 1988 until 1992, when I graduated.

In or about 1991, I went to see a gynecologist at USC, Dr. Tyndall for a pap smear.

I was told to undress from the waist down, given a paper type cover for the upper half of my body, and told to lie down. I did so, putting my feet on the stirrups at the end of the examination table.

Dr. Tyndall walked into the examining room alone. He began to perform the examination, but then turned around and pulled out a camera from behind a box on his shelf.

Dr. Tyndall began to take pictures of my genital area close up. He said it was a new way to do examinations instead of a pap smear because they could see things more closely.

He then got up and started to walk backwards away from the table and began taking full body pictures of my private area. I was trying to cover my face with the paper cover.

After I came out of the examination room, my then boyfriend was waiting for me. I started crying. I told him what Dr. Tyndall had done to me. He told me I had to report it. He and I went to the Medical Director of the Clinic and I told him what Dr. Tyndall had done to me.

The Medical Director then had a female nurse speak to me in case I had been too embarrassed to tell him everything. I repeated the same story to her.

The Medical Director told me he went to confront Dr. Tyndall, but Dr. Tyndall had denied it and denied having a camera. Because I had told the Medical Director where Dr. Tyndall had retrieved the camera, the Medical Director told

me that he was able to locate the camera. Then the Medical Director stated Dr. Tyndall exposed the film in the camera.

About a week after the incident I called USC's women's advocacy office to file a complaint. Nothing ever came of it.

After reporting the incident to the Medical Director, I had assumed that some action would be taken by USC. However, the next year when I made an appointment for my annual pap smear, I was given an appointment with Dr. Tyndall. I told the person the whole story about what had happened the year before and told her I did not want to see Dr. Tyndall again and to schedule my appointment with someone else."

Assuming these allegations made by witness Jane Doe are true, U.S.C. was told as early as 1991 about Dr. Tyndall's sexual misconduct, because Jane Doe alleges that she reported it then to the Clinic Medical Director, a female nurse and U.S.C.'s woman's advocacy office.

The fact that U.S.C. failed to take appropriate action to protect students from Dr. Tyndall after that is inexcusable.

Finally, U.S.C. has now set up a hotline to take calls from students or former students who allege that they have been victimized.

One former student who called that hotline is with us today. She will recount her experience when she called the hotline and share what she thinks victims should do instead of calling it.

It is time for U.S.C. to conduct a completely independent investigation of how and why the University failed to protect its female students from Dr. Tyndall.

Young Women had every right to expect that they could trust U.S.C. and the gynecologist assigned to examine them and treat them.

Women are extremely vulnerable when they undergo their most intimate, but necessary examinations. They have every right to feel that their trust was betrayed as they underwent what appears to be unprofessional and sometimes

extremely risky and unnecessary invasions of their bodies by someone who may have thought only of satisfying his own sexual needs rather than adhering to his professional responsibilities.

We will vigorously litigate this lawsuit and may be filing others as well.

We will not stop until the truth is known and we win justice for the U.S.C. women whose rights were violated.

Gloria Allred  
Attorney at Law  
Representing Danielle Mohazab  
May 22, 2018