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Statement of Gloria Allred

Today we filed two new lawsuits against Gilroy Unified School District (GUSD). We have filed these cases on behalf of two former students of Douglas Le. Mr. Le was a teacher and he was involved in athletics at Gilroy High School. We allege that GUSD failed to protect and safeguard our clients from the sexual misconduct against them by Mr. Le, even though GUSD knew that Mr. Le had previously engaged in unlawful sexually related conduct with minors at Gilroy High School, because GUSD had been warned about Mr. Le by Celest Benn,¹ and our investigation has revealed that Ms. Benn was not the only person who notified the school district about the misconduct of Mr. Le.

Ms. Benn is a parent of another student of Mr. Le's at Gilroy High School. She had reported to GUSD Mr. Le's sexually inappropriate conduct toward her daughter, but despite that warning, GUSD permitted Mr. Le to remain in a position of authority and trust with students which allowed Mr. Le to continue to verbally, physically and sexually harass and abuse children entrusted to his care.

To make matters worse, GUSD had the authority and ability to terminate Mr. Le's verbal and physical abuse and sexual assaults of his students, but failed to do so. Further, the GUSD failed to warn parents of the Gilroy students that their minor children were at risk because of Mr. Le's previous conduct and the GUSD failed to put into place a system to monitor and supervise Mr. Le to ensure that he did not harass and abuse minors in his care.

As a result of GUSD's many failures to perform their legally mandated duties to ensure the safety of these children, we filed two lawsuits against them today in the Superior Court of Santa Clara County. We allege negligence, negligent supervision, negligent retention, intentional infliction of emotional distress, sexual harassment and gender violence.

A major goal of our lawsuits is to impose policy and practice changes on the district to make sure that this never happens again. In addition, we are seeking

damages, including punitive damages according to proof at trial. Our clients, who are minor children, were seriously harmed and impacted by GUSD's failure to protect them from verbal, physical and sexual harassment by their teacher.

In our lawsuit, we allege that our clients began to experience and continue to experience multiple emotional, physical and psychological problems such as depression, academic demoralization, and dread that Mr. Le's actions would destroy their ability to gain entrance into a good college, sleeplessness, distrust, isolation and alienation. We allege that Mr. Le's actions and the failure of the GUSD thwarted and destroyed what should have been the happiest and most carefree period in the lives of these children.

Although we have filed these lawsuits today, they will not be the last ones that we file, because other alleged victims of Mr. Le have contacted us and are considering their legal options as well.

We commend these children and their parents for their courage in filing these lawsuits. What they have suffered should never be endured by any child. We are protecting their identity because they are minors and victims of sexual abuse, but they are proceeding with this lawsuit because they want the GUSD to be accountable and to do everything possible to make sure that this will never happen to anyone else.

Gloria Allred
Attorney at Law
Representing 2 unidentified minors in lawsuits against GUSD
June 22, 2016

Note: Ms. Allred's firm Allred, Maroko & Goldberg is co-counseling with the firm of Manly, Stewart & Finaldi

1. We have previously filed a lawsuit on behalf of Ms. Benn's minor daughter against GUSD