Statement of Jane Doe (Read by Gloria Allred)

In early 1999, I was a graduate student at the USC School of Cinema-Television. I needed to renew my birth control prescription so I made an appointment at the student health center for the annual exam required to renew my prescription. I did not want my contraceptive coverage to lapse so I accepted the first available appointment for a pelvic exam. I was assigned to see Dr George Tyndall.

As a 26 year old woman at the time, I was familiar with the procedure of the vaginal pelvic exam. This was not my first one. However, this exam completely departed from the norm. As soon as Dr Tyndall finished the pelvic exam, he suddenly and without warning performed a rectal exam, penetrating me from behind with his finger. I was absolutely stunned and horrified. For this kind of penetration to occur without my consent, without any communication or warning, even in a doctor's office, seemed inappropriate, disrespectful, and invasive. I felt violated and mortified.

I also felt helpless, wondering to myself if I should say something, to protest the doctor who my university had sanctioned to treat me and all other female students at USC. I finally wrote a complaint to the student health center on a comment card. Despite my warning and others' complaints about him, USC allowed him to prey upon female students for *seventeen more years*. This is unacceptable.

A few months ago in May, I felt a sick feeling in my stomach as I read the exposé in the LA Times about Dr Tyndall's decades of abuse of USC women. Memory of that appointment came flooding back. I could not remember the doctor's name, but I vividly remembered his face, what he did, and how I upset felt. I requested my medical records from USC and was shocked to hear that USC destroys all medical records after 10 years. The only information they could provide me was confirmation of an appointment with Dr Tyndall in 1999.

Since then, I have been treated by many wonderful doctors in my life, and every single female gynecologist I have seen has clearly explained their actions during a medical exam, with no surprises or trauma.

This is a difficult story to share, but I want to support the other women who have come forward who were violated by Dr Tyndall. I want current and future college students to feel supported to raise their voices to report abuse as well. I want universities to make the safety of their students paramount. And I want to set an example to my own children - that their mother is not afraid to raise her voice and fight for herself and for them. We must speak truth to power.

> Represented by Attorney Gloria Allred August 6, 2018