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Statement of Gloria Allred

On November 1, 2013 we filed a lawsuit against the University of Connecticut (UConn) in federal court in Hartford Connecticut on behalf of rape or sexual assault victims who were students or former students of UConn.

Our lawsuit alleged that UConn had discriminated against our clients on the basis of their gender and retaliated against them in violation of Title IX, a federal law which prohibits discrimination on the basis of sex and which guarantees equal educational opportunity to students at educational institutions which receive federal funds, such as the University of Connecticut. We sought damages according to proof at trial.

Today we are very happy to announce the settlement of our lawsuit on behalf of our named plaintiffs Carolyn Luby, Kylie Angell, Erica Daniels, Rosemary Richi and Sylvana Moccia.

The settlement requires UConn to compensate our clients in the total amount of \$1,285,000.

We appreciate and acknowledge UConn's constructive role and approach which allowed a settlement to occur at this early stage in the litigation process. We particularly wish to commend UConn's General Counsel, Richard Orr, for his leadership and important commitment to resolving these cases in a sensitive manner that was respectful of our clients.

In our joint press statement with UConn, UConn has acknowledged our clients' role in inspiring important public conversation regarding the issue of sexual violence. We also believe that our clients played a vital role in UConn's strengthening its policies and procedures for addressing sexual violence.

We appreciate UConn's willingness to resolve this lawsuit in a positive manner allowing our clients and the University to move forward and put this

lawsuit behind them. We believe that the settlement is in the best interests of our clients and that it is also in the best interest of UConn.

We are very proud of our courageous clients who came forward to assert their rights under Title IX. They want to eliminate sexual and gender based harassment and violence, to prevent its recurrence, to support survivors and to hold perpetrators accountable.

UConn has indicated its firm commitment to these goals and we are encouraged that UConn has taken important steps to make UConn the safest possible campus and to support survivors, which UConn acknowledges is a goal that they share with our clients.

I also wish to express my deep appreciation to my law partner, Nathan Goldberg, for his significant legal efforts in this case, and to my co-counsel Nina Pirrotti for her exceptional dedication and legal work on this case.

Last Sunday, July 13 2014, the New York Times published an article about a female college student at a New York college who alleged that she had been raped.¹ The article suggested that the student seemed to regret having reported her allegations to her college.

I hope that other students who are victims of sexual violence on college campuses throughout this nation will hear about the positive results in our case involving UConn and be inspired and encouraged to report rape and sexual assault to their institution of higher learning with the hope that their rights will be respected by their colleges and that they are able to win change and greater protection for themselves and other victims on their campuses.

Title IX is there for their protection and other universities should follow the law and UConn's example in working to improve their policies, procedures, and services to all victims of crimes, including rape and sexual assault, so that victims will be encouraged, not discouraged from reporting to them violations of the law or student codes of conduct. The negative experience of the one college student in New York should not discourage others from reporting.

Our clients are moving forward with their lives in a positive manner with full knowledge that they have made a difference. They are examples of what

young empowered women can accomplish when they work together to win change and greater protections at the University that they love.

1. *Reporting Rape, and Wishing She Hadn't*
How One College Handled a Sexual Assault Complaint by Walt Bogdanich

Attorney Gloria Allred
Representing
Carolyn Luby, Kylie Angell, Erica Daniels, Rosemary Richi and Sylvana Moccia
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FOR IMMEDIATE RELEASE

STATEMENT OF NINA T. PIRROTTI REGARDING SETTLEMENT OF
LUBY ET AL. V. UNIVERSITY OF CONNECTICUT

It has been a true honor to represent five courageous young women, each of whom, in her own way, challenged her university to do better. I am gratified to report that UConn has risen to the occasion and met those challenges.

The road the parties travelled to get to this point was not an easy one – there were many bumps along the way. In the end, I believe what carried the day was a determination by both sides to put aside our differences and focus on a shared goal – to work toward the eradication of sexual violence and harassment at UConn and to ensure that victims receive the guidance, support and resources they need to obtain justice and to heal.

JOINT STATEMENT

On November 1, 2013, four current or former students announced a civil lawsuit against the University of Connecticut (UConn) alleging that the University had violated its obligations under Title IX of the Education Amendments of 1972. Title IX is a federal law that prohibits discrimination on the basis of sex in educational institutions that receive federal funds. A fifth plaintiff joined the suit on December 20, 2013. The named plaintiffs are Carolyn Luby, Kylie Angell, Erica Daniels, Rosemary Richi, and Silvana Moccia.

UConn and the plaintiffs in the pending Title IX litigation are announcing the settlement of the lawsuit, as set forth in this joint statement.

UConn and the plaintiffs share the same goals: to eliminate sexual and gender-based harassment and violence, to prevent its recurrence, to address its impact on individuals and the UConn community, to make UConn the safest possible campus and, when incidents do occur, to support survivors and to hold perpetrators accountable.

The parties acknowledge that prior to the lawsuit and the OCR complaint UConn had already taken important measures to strengthen and enhance its policies and procedures for addressing sexual violence. The steps taken, or in progress, as of October 2013 include:

- In January 2012 UConn was the first university in Connecticut to adopt a comprehensive Sexual Assault Response Policy (SARP) making it mandatory for virtually all employees to report allegations of sexual assault to the appropriate university officials.
- In April 2013 then-student Carolyn Luby published on a non-UConn web site a letter on issues related to sexual violence at UConn. This letter triggered hateful comments about Ms. Luby, and in response, President Herbst commissioned a Civility Task Force (May 2013) to assess campus climate, best practices and make recommendations for further action at UConn.
- In August 2013 UConn adopted an enhanced Policy against Discrimination, Harassment and Inappropriate Romantic Relationships
- After the Civility Task Force presented its report in December 2013, President Herbst issued a response in February 2014 which included immediate implementation of many recommendations.

UConn acknowledges the role of the named plaintiffs in inspiring important public discussion regarding issues of sexual violence. In the months since October 2013, UConn has taken, or begun planning for, the following additional measures to address those issues:

- UConn has enhanced its training program for management-level employees on issues of sexual harassment and sexual violence.

- UConn has established a new Assistant Dean of Students for Victim Support Services position to coordinate the delivery of services to victims of crime, including sexual violence.
- UConn has centralized the University's response to sexual violence that violates UConn's Code of Conduct and University Policy. The Office of the Title IX Coordinator will oversee all investigations of sexual assault and related conduct. UConn has added two staff investigator positions to support these University investigations.
- The UConn Police Department has formed a Special Victims Unit available 24/7 with a team of officers trained in responding to sexual violence.
- UConn has begun enhancing educational programming for all first year students, including an increased emphasis on primary prevention, risk reduction and bystander intervention training.
- During Academic Year 2014-2015, UConn will form a working group to further develop and refine sexual violence and bystander intervention training.

UConn, including the Board of Trustees, President Herbst, and key University employees are committed to doing all they can to prevent sexual assault on UConn's campuses, to provide essential resources to all victims of sexual violence and to ensure that all victims are treated with care and compassion.

The plaintiffs do not claim that the university was in any way responsible for any assault or for harassment directed at them. Instead, plaintiffs allege UConn's response was in violation of Title IX.

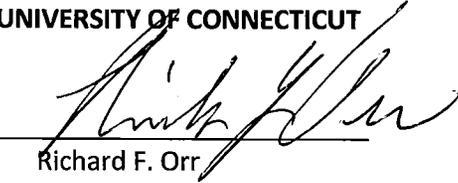
Plaintiffs acknowledge that certain UConn employees provided compassionate care and assistance to them but allege that the overall response showed deliberate indifference. Plaintiffs also acknowledge that, had the case gone to trial, UConn would have introduced evidence of its support to the plaintiffs, contested the factual allegations of the complaint, and would have introduced evidence to dispute the claim that it showed deliberate indifference to the plaintiffs.

A trial would have burdened both UConn and the plaintiffs for years, fighting over the past rather than working on the future. Accordingly, UConn and the plaintiffs have agreed to put to rest their factual disputes, settle the litigation, and move forward. That process has already started.

This settlement reflects a shared commitment by UConn and its current and former students to preventing sexual violence at UConn and continuing to enhance effective responses to such violence.

KYLIE ANGELL, ERICA DANIELS, CAROLYN LUBY, SILVANA MOCCIA and ROSEMARY RICHI

By: 
Gloria Allred
Counsel for the Plaintiffs

THE UNIVERSITY OF CONNECTICUT
By: 
Richard F. Orr
General Counsel, UConn

Statement of Carolyn Luby

As the lead complainant in this Title IX lawsuit, I am glad to see UConn has taken our cases seriously. I am optimistic about UConn's proposed changes and am looking forward to seeing them implemented in ways that will make a significant difference for years to come. This lawsuit has catalyzed change on UConn's campus so that hopefully, future generations of students do not have to experience sexual violence – and if they do there will be systems in place to ensure they get the help and justice they deserve. With the settling of this lawsuit, I am moving on from my individual case at UConn, but my experience there will continue to inform my activism with students around the country to ensure safe campuses for all students, nationwide.

Statement of Erica Daniels

I am satisfied with the manner in which this case has resolved and look forward to moving on with my life. I believe that the changes UConn has put in place will benefit all students, including student employees. As a former student employee, I am appreciative of that.

Statement of Kylie Angell

I have found the process of working with University representatives, State officials, and my legal counsel toward formally addressing the issues in my specific case to be restorative and empowering. As a result of UConn and our state government taking my claims so seriously, I have begun to heal. I look forward to seeing UConn continue to respond with such seriousness to reports of sexual assault, with the hope that future women who find themselves victims of sexual assault will be empowered by reporting to a university that supports them and protects their rights.

Statement of Rosemary Richi

I am pleased with the steps UConn has taken to strengthen its support system for victims of sexual assault. As I enter into my senior year at UConn, I am optimistic that these steps will make a meaningful difference for all students. I intend on using my experiences to continue this important dialogue not only at UConn, but also in my future endeavors. I will never forget where we came from and how we got here, but I am so proud of how far we have come.