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DEAR REGIONAL DIRECTOR,

PLEASE NOTE THAT I HEREBY FILE THIS RETALIATION COMPLAINT (TITLE IX) AGAINST THE UNIVERSITY OF SOUTHERN CALIFORNIA. THIS DOCUMENT IS ALSO A (PARTIAL) APPEAL FROM A FORMER RULING.

YOURS TRULY,

KURSAT CHRISTOFF PEKGOZ  
PROVOST'S FELLOW  
DEPARTMENT OF ENGLISH  
UNIVERSITY OF SOUTHERN CALIFORNIA

CC: Assistant Secretary for Civil Rights  
CC: Office for Civil Rights, San Francisco Office

# PROLOGUE

Men and women experience sexual victimization at equivalent rates<sup>1</sup> and the majority of male victims report female perpetrators.<sup>2</sup> However, according to institutions that release such data, the overwhelming majority of the persons sanctioned under Title IX theory are male.<sup>3</sup> The majority of Title IX administrators nationwide are women.<sup>4</sup> Title IX administrators often use biased and unscientific training materials.<sup>5,6</sup>

The lack of due process in Title IX tribunals has received widespread and bipartisan criticism, including from legal and academic experts. Critics include: Federalist Society,<sup>7</sup> Heritage Foundation,<sup>8</sup> National Association of Scholars,<sup>9</sup> Edmund Jr. Brown (former Governor of California),<sup>10</sup> NCHERM,<sup>11</sup> Justice Ruth Bader Ginsburg,<sup>12</sup> American

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<sup>1</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4062022/>

<sup>2</sup> <https://www.sciencedirect.com/science/article/pii/S1359178916301446?via%3Dihub>

<sup>3</sup> <https://news.stanford.edu/2018/02/27/provost-issues-campus-wide-report-title-ix-sexual-harassment-cases/>

[https://provost.yale.edu/sites/default/files/files/FINAL%20February%202018%20Report\(1\).pdf](https://provost.yale.edu/sites/default/files/files/FINAL%20February%202018%20Report(1).pdf)

<sup>4</sup> [https://www.nas.org/articles/gender\\_inequity\\_among\\_the\\_gender\\_equity\\_enforcers](https://www.nas.org/articles/gender_inequity_among_the_gender_equity_enforcers)

<sup>5</sup> <http://www.prosecutorintegrity.org/wp-content/uploads/2018/01/Believe-the-Victim-FINAL.pdf>

<sup>6</sup> <https://www.theatlantic.com/education/archive/2017/09/the-bad-science-behind-campus-response-to-sexual-assault/539211/>

<sup>7</sup> <https://regproject.org/wp-content/uploads/RTP-Race-Sex-Working-Group-Paper-Campus-Misconduct-Proceedings.pdf>

<sup>8</sup> <https://www.heritage.org/crime-and-justice/report/campus-sexual-assault-understanding-the-problem-and-how-fix-it>

<sup>9</sup> [https://www.nas.org/articles/nas\\_applauds\\_secretary\\_devos\\_decision\\_on\\_title\\_ix](https://www.nas.org/articles/nas_applauds_secretary_devos_decision_on_title_ix)

<sup>10</sup> <https://www.wsj.com/articles/jerry-browns-title-ix-veto-1508280834>

<sup>11</sup> <https://www.ncherp.org/wp-content/uploads/2017/04/TNG-Whitepaper-Final-Electronic-Version.pdf>

<sup>12</sup> <https://reason.com/blog/2018/02/19/ruth-bader-ginsburg-due-process-me-too>

College of Trial Lawyers,<sup>13</sup> the Reason Foundation.<sup>14</sup> There have been various coalition letters, condemning the injustice.<sup>15,16,17,18,19</sup>

Retaliation against men who complain about gender discrimination, or who make statements critical of campus gender orthodoxy, is rampant in American academia.<sup>20,21,22,23,24,25</sup> The University of Southern California has been called out repeatedly due to its bias against men.<sup>26,27,28,29,30,31,32</sup> Daily Trojan, the official channel of the University, is very partisan in terms of gender politics.<sup>33,34,35,36,37</sup>

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<sup>13</sup>[https://www.actl.com/docs/default-source/default-document-library/position-statements-and-white-papers/task\\_force\\_allegations\\_of\\_sexual\\_violence\\_white\\_paper\\_final.pdf](https://www.actl.com/docs/default-source/default-document-library/position-statements-and-white-papers/task_force_allegations_of_sexual_violence_white_paper_final.pdf)

<sup>14</sup> <https://reason.com/blog/2017/09/07/betsy-devos-rape-ocr-title-ix-campus>

<sup>15</sup> <https://dash.harvard.edu/handle/1/33789434>

<sup>16</sup><https://www.washingtontimes.com/news/2016/may/18/law-professors-letter-denounces-title-ix-overreach/>

<sup>17</sup><https://www.washingtonpost.com/news/volokh-conspiracy/wp/2015/02/19/open-letter-from-16-penn-law-school-professors-about-title-ix-and-sexual-assault-complaints/>

<sup>18</sup><http://www.saveservices.org/wp-content/uploads/Victim-Centered-Practices-Open-Letter-FINAL.docx.pdf>

<sup>19</sup> <http://www.saveservices.org/wp-content/uploads/Due-Process-Statement-11.29.2018.pdf>

<sup>20</sup><http://www.foxnews.com/us/2018/03/12/college-student-kicked-out-class-for-telling-professor-there-are-only-two-genders.html>

<sup>21</sup><https://www.andrewlawton.ca/pro-free-speech-professor-rick-mehta-fired-by-acadia-university/>

<sup>22</sup><https://thehill.com/blogs/blog-briefing-room/news/409090-catholic-university-suspends-dean-over-comment-that-degraded>

<sup>23</sup><https://pjmedia.com/trending/students-demand-professor-fired-after-he-champions-due-process-says-accusers-sometimes-lie/>

<sup>24</sup><https://www.washingtontimes.com/news/2019/jan/7/peter-boghossian-portland-state-univ-professor-fac/>

<sup>25</sup><https://spectator.us/diversocrats-take-harvard/>

<sup>26</sup><https://www.thecollegefix.com/student-punished-confusing-orgy-denied-fair-hearing-usc-appeals-court-rules/>

<sup>27</sup> <https://reason.com/blog/2016/08/02/usc-title-ix-official-campus-rape>

<sup>28</sup> <https://reason.com/blog/2017/08/02/student-athletes-torn-apart-by-title-ix>

<sup>29</sup><https://www.nationalreview.com/corner/uscs-title-ix-catastrophe-when-gender-studies-majors-act-judge-jury-and-executioner/>

<sup>30</sup><https://www.dailywire.com/news/32815/university-ordered-pay-accused-student-100000-ashe-schow>

<sup>31</sup><https://www.cbsnews.com/news/armaan-premjee-usc-student-cleared-rape-charge-security-video/>

<sup>32</sup> <https://www.latimes.com/sports/usc/la-sp-usc-bryce-dixon-appeal-20190107-story.html>

<sup>33</sup><http://dailytrojan.com/2019/04/25/you-do-uterus-as-young-women-we-trace-our-power-to-our-roots/>

<sup>34</sup> <https://dailytrojan.com/2018/06/12/protestors-march-against-sexual-misconduct-scandals/>

<sup>35</sup> <https://dailytrojan.com/2019/01/25/sage-hosts-roe-v-wade-event-with-gloria-allred/>

<sup>36</sup> <http://dailytrojan.com/2017/08/14/sexual-assault-survivors-sum-narratives/>

<sup>37</sup><https://dailytrojan.com/2019/01/15/increased-enrollment-of-women-does-not-mean-gender-equality/>

## JURISDICTION & TIMELINESS

According to the Case Processing Manual, the Washington: DC Office has appellate jurisdiction over Title IX complaints.<sup>38</sup> Since this complaint is in part a new complaint and in part an appeal, it would fall under the joint jurisdiction of the San Francisco Office and the Washington: DC Office.

This complaint/appeal is timely because the pattern of discrimination is ongoing and will not cease without decisive OCR intervention. Indeed, I am suffering from ongoing retaliation precisely because OCR dismissed a former retaliation complaint (#09-17-2446) despite credible evidence which no reasonable person should have dismissed. OCR can reopen “cold” cases<sup>39,40</sup> whenever proper and waive the deadline under a series of circumstances.

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<sup>38</sup> Section 307.

<sup>39</sup><https://www.algemeiner.com/2018/09/07/education-dept-to-probe-whether-rutgers-university-tolerates-hostile-environment-for-jewish-students/>

<sup>40</sup> <https://www.nytimes.com/2019/04/09/us/texas-tech-affirmative-action.html>

## LEGAL THEORY

Title IX prohibits retaliation.<sup>41</sup> Title IX also prohibits disparate treatment/sanctions, as per 34 CFR § 106.31(a)(1).<sup>42</sup> The same standard of retaliation must be used to assess the retaliation claims of women and men. I have engaged in various modes of protests/complaints which are legitimate on account of being “in good faith” and “objectively reasonable.”<sup>43,44</sup> Moreover, the University is well aware that I am a federal complainant. My advocacy is very public.<sup>45</sup>

The Ninth Circuit recognizes that retaliation cases must survive summary judgement as long as they satisfy the reasonable person standard.<sup>46</sup> The Ninth Circuit also recognizes “mixed motive” under Title VII theory: allegations of discrimination/retaliation have merit as long as they are reasonable, even if non-discriminatory reasons are also present.<sup>47</sup> Moreover, negative academic performance is common among victims of sexual harassment/retaliation, further blurring the lines.

The White House has issued a new executive order to protect free speech on college campuses,<sup>48</sup> consistent with an update to the Case Processing Manual.<sup>49</sup> I am being persecuted for my libertarian opinions, which remain unpopular on campuses.<sup>50</sup>

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<sup>41</sup> <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201304.html>

<sup>42</sup> <https://www.law.cornell.edu/cfr/text/34/106.31>

<sup>43</sup> All allegations in a former Title IX complaint, #09-16-2128, were found to be “in good faith” and “objectively reasonable” (*Resolution Letter with the University of Southern California*, #09-17-2446, p. 5). The University has been on notice since 8 March 2016. I have appealed/amended this complaint since.

<sup>44</sup> The allegations in a current Title IX complaint, #09-18-2031, are also legitimate. A very similar complaint against Tulane University has resulted in a favorable resolution letter.

<http://www.aei.org/publication/successful-title-ix-complaint-forces-tulane-university-to-end-gender-discrimination/>

<sup>45</sup> For example, a quick Google search about “men + Title IX” or “male + Title IX” immediately reveals articles about my work. Among 54+ million results, the top two articles are about my advocacy.

<https://www.usatoday.com/story/opinion/2019/02/12/colleges-universities-discriminate-men-title-ix-complaints-toxic-masculinity-column/2831834002/>

<sup>46</sup> <https://law.justia.com/cases/federal/appellate-courts/ca9/10-35551/10-35551-2012-03-21.html>

<sup>47</sup> <http://cdn.ca9.uscourts.gov/datastore/opinions/2018/11/19/17-55723.pdf>

<sup>48</sup> [https://www.insidehighered.com/sites/default/server\\_files/media/White%20House%20Executive%20Order.pdf](https://www.insidehighered.com/sites/default/server_files/media/White%20House%20Executive%20Order.pdf)

<sup>49</sup> Section 109. <https://www2.ed.gov/about/offices/list/ocr/docs/ocrcpm.pdf>

<sup>50</sup> [https://www.nas.org/articles/homogenous\\_political\\_affiliations\\_of\\_elite\\_liberal](https://www.nas.org/articles/homogenous_political_affiliations_of_elite_liberal)

# COMPLAINT

**ALLEGATION 1.** *During a meeting, a University official (John Holland) threatened me with termination and pressured me into dropping out.*

**CONTEXT.** I had a meeting with the Director of the Writing Program, John Holland, on 5 June 2017. This meeting occurred in person, even though I expressed clearly that I wanted all discussions to happen through e-mail (**A1**). During this meeting, John Holland pressured me into terminating my doctoral degree. Specifically, he sought to coerce me into taking my dissertation fellowship one year before the contractual date. He made many threats and irrational exaggerations during the meeting, while acknowledging that the decision involved the Deans.<sup>51</sup>

Since it is impossible to finish a Ph.D. on such an expedited basis, this was a *de facto* resignation request. There is a verbatim transcript which proves that I was telling the truth.<sup>52</sup> Transcript attached (**A2i-ii**).

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<sup>51</sup> Deans are rarely involved in issues like student evaluations, assistant lecturer contracts, et cetera. They would not have involved if the issue did not involve a more important administrative decision (i.e. how to intimidate/neutralize a federal complainant). I believe John Holland received specific instructions prior to the meeting.

<sup>52</sup> There was no reasonable expectation of privacy during the meeting. Federal law allows recording of meetings with the consent of one party. OCR is beholden to federal law. Californian law allows audiotapes to be presented as evidence in order to impeach perjurers: *Frio v. Superior Court* (1988) 203 Cal.App.3d 1480. Lying to a federal investigator is akin to perjury. John Holland denied making these statements, and the “poor memory defense” is unconvincing (i.e. I was the only student under a probationary contract and the only federal complainant).

**ALLEGATION 2.** *The University has placed me under a probationary contract, singling me out for such treatment.*

After my meeting with John Holland, I was placed under a unique “probationary contract” **(B1)**. I was the only instructor, from among a pool of 110+ instructors, to be placed under a probationary contract. I am also the only federal complainant. I received the contract at a later date (July) than all instructors (May), indicating that I was singled out for the negative treatment **(B2)**. This is consistent with statements I collected from other student instructors **(B3i-ii)**.

The University has argued that the probationary contract is justified because of low student evaluations. But this is misleading/pretextual.

1. Carlos Delgado, a senior lecturer, told me that he was unaware of any examples of the University terminating an assistant lecturer due to low student evaluations only **(B4)**.
2. I had both positive and negative evaluations, i.e. I did not have the lowest evaluation scores from among a pool of 110+ instructors over a consistent time period, which would have justified the probationary contract **(B5)**.
3. The University has eliminated the use of student evaluations in various contexts.<sup>53</sup>

Likewise, absenteeism (another reason offered by John Holland) was also pretextual. Absenteeism is common and I volunteered to help absent instructors before **(B6)**. OCR formerly investigated a similar complaint and dismissed it despite the weight of the probative evidence.<sup>54</sup> This undue dismissal made me susceptible to additional retaliation.

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<sup>53</sup> <https://www.insidehighered.com/news/2018/05/22/most-institutions-say-they-value-teaching-how-they-assess-it-tells-different-story>

<sup>54</sup> It is my understanding that OCR also pressured the University to restore my normal teaching contract for the 2018-2019 year. However, in the absence of crystal-clear language which spells out the University’s retaliatory intent and decisions, the University has once again engaged in illegal conduct.

**ALLEGATION 3.** *Hilary Schor, a partisan professor, attempted to veto my dissertation in secret.*

**CONTEXT.** When I sought to defend my dissertation, I forwarded the prospectus to a committee of five members. Hilary Schor was the only professor to veto my dissertation, and she did so in secret. I was only notified of this improper action through an email forwarded to me by Margaret Russett, another professor. I also discovered that Russett sought to convince other professors that my Ph.D. degree should not merit any teaching credentials, a self-evident act of collusion **(C1)**. I was only able to defend my dissertation by hastily replacing Schor.

Hilary Schor is the same professor who compelled the former president of the institution (Max Nikias) to step down based on meritless allegations of racism and sexism.<sup>55,56</sup> Moreover, she is an academic/personal confidante of Rebecca Ehrhardt, the female student who made false accusations against me.<sup>57,58</sup> In addition to her extreme partisanship, students have expressed concerns about Hilary Schor's mental illness since 2008 **(C2)**.

Hilary Schor has defended her improper conduct through various abstractions and pretexts. However, these pretexts are moot.

1. I took an Introduction to Theory class from Schor in 2014, and I received an A (the highest grade). She made very positive remarks about my writing skills.
2. Schor's comments about my dissertation were positive during our initial meeting – before she discovered my political views **(C3)**.
3. Schor was the *only* professor, among a committee of five members, to veto my dissertation (in secret).
4. During our meeting, Schor admitted that she has never resigned from an academic advisorship position before.<sup>59</sup>

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<sup>55</sup> <https://www.latimes.com/local/abcarian/la-me-abcarian-nikias-resigns-20180526-story.html>

<sup>56</sup> The allegations are meritless because the Office of the President was not involved in adjudicating Tyndall's situation. If anything, the person who had to resign was Gretchen Dahlinger Means, the Title IX Coordinator, who was involved in the investigation/adjudication.

<sup>57</sup> Ehrhardt routinely spent time in Schor's apartment, which is an inappropriate form of professor/student interaction. I received this information through various contacts. Schor is also Ehrhardt's academic advisor.

<sup>58</sup> Ehrhardt claimed that she was a victim of harassment because, in her words, "he was manipulating my emotions and lying to me by telling me that he was not attracted to me."

<sup>59</sup> There was no reasonable expectation of privacy during our meeting.



**ALLEGATION 4.** *The University has deprived me of my stipend and summer funding for the 2019-2020 year, by refusing to renew my contract, even though such renewals are routinely granted.*

**CONTEXT.** The University has singled me out to deprive me of my stipend when I wanted to extend my Ph.D. for an additional year **(D1)**. This is despite the fact that I made timely applications to various scholarships/assistantships, all of which were denied. Such contractual renewals are routinely granted and many doctoral students take more than the allotted time (i.e. five years) to complete their degree. Two specific examples I can offer would involve M.A., a former international student who spent eight years at the institution (without ever being deprived of funding) and S.P., a senior student who told me that he has renewed his contract many times.

It is also worth noting that other members of my cohort (Betsy Sullivan, Rebecca Ehrhardt, Sanders Bernstein) have been granted more lucrative/competitive positions, such as TO assistantships. Moreover, the English Department routinely wastes money on trivial projects - i.e. lack of funding is not an issue **(D2)**.

**ALLEGATION 5.** *The University subjected me to unique, discriminatory standards and denied my Ph.D. degree based on vague academic pretexts.*

**CONTEXT.** I placed a timely request for a one-year Leave of Absence during last academic year, i.e. 2018-19, a request that is routinely granted to other doctoral students.<sup>60</sup> I requested this LOA so that I can take some time off to deal with various extracurricular problems (such as my mother struggling with breast cancer, immigration paperwork,<sup>61</sup> and pursuing additional lines of employment). The University was expecting me to support myself financially while writing a dissertation, even though other students are not required to do so.

Some time after the request was denied, the University invented a new, unique rule according to which I had to defend my dissertation at the end of one year of extension (i.e. the sixth year) even though other students are not required to do so (**E2**). There are many students who have ABD status, i.e. who have not defended their dissertations despite being affiliated with the institution for almost a decade. The University's academic affairs code does not even prescribe a maximum limit for completing a Ph.D. degree; the time limit for completing a Bachelor's degree is 10 (ten) years. The letter I received also specified that I should submit a timely dissertation chapter by an arbitrary deadline (1 August, 2019). I fulfilled the deadline and submitted a chapter.

However, my dissertation was vetoed regardless and I was terminated from the Ph.D. program based on vague pretexts. The person who vetoed my dissertation is Margaret Russett, a radical feminist who graduated from Yale. Her views on gender politics, as well as her affiliation with Yale, are potential reasons for bias.<sup>62,63</sup>

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<sup>60</sup> Steven S., a different doctoral student, was granted such an extension.

<sup>61</sup> I have engaged in extensive civil rights advocacy on behalf of religious and ethnic minorities in Turkey, including (but not limited to) signing the 2016 Declaration, "We Will Not Be A Party To This Crime." The Turkish government is prosecuting all signatories. As such, I am unable to return to Turkey under current circumstances.

<sup>62</sup> The Department of Education is currently investigating Yale University for discrimination against men at my request.

<sup>63</sup> Hilary Schor and Margaret Russett collaborated together to create a partisan petition which demanded the ouster of Max Nikias, former president of the University of Southern California, based on false allegations of racism and sexism (i.e. based on the perception that Max Nikias did not issue severe sanctions

Russett has invited me to a “personal meeting,” as per a letter she sent me, even though I preferred to communicate in writing. During the meeting, Russett sought to discourage me from seeking legal redress. This is malicious dissuasion / retaliation, as per the University’s own policy and under a commonsense interpretation of Title IX.

1. Russett complained that the dissertation chapter was too short, even though I previously asked her whether there was any required length or word count. Her answer was negative at that time. There is no maximum or minimum number of dissertation chapters for that matter, either.
2. Russett complained that the dissertation chapter did not cite enough contemporary sources “after 2006,” despite previously acknowledging that an anthology that I was citing for the chapter had enough articles in it based on her own specifications, and despite the fact that there is a separate master bibliography.
3. Russett offered other vague pretexts, although it is universally understood that the task of the thesis advisor is to offer corrections.

I am unaware of any other Ph.D. student who has been denied a doctoral degree in English Literature. If it has occurred at all, this must be a very rare occurrence, historically speaking.<sup>64</sup>

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to men accused of sexual misconduct). In reality, Max Nikias had little control over the affairs of the Title IX Office. He was a humanitarian and philanthropist, who believed in the importance of emphasizing Classical heritage.

<sup>64</sup> Kimberly Allen, an Associate Dean who specializes in graduate student affairs, confirmed that it is very rare for Ph.D. students to be dismissed from their programs.

## MISCELLANEOUS

While the incidents covered below do not fall under OCR's jurisdiction, I would like to recapitulate them to emphasize the harm I experienced for coming forward as a federal complainant. OCR may consider this circumstantial information.

**ACADEMIC HARM.** In terms of gender politics, any individual who has dissident views in academia is unlikely to survive for long. By coming forward with a Title IX complaint which challenged discrimination against men on a federal level, I have permanently harmed my chances of a future academic career.<sup>65,66</sup>

**DISCRIMINATION/CORRUPTION.** Retaliation occurs in the presence of discrimination and administrative corruption. There are three appellate rulings which condemned the University's unfair treatment towards male students.<sup>67</sup> Nothing prevents OCR from considering all evidence of discrimination presented hitherto while evaluating this retaliation complaint. Moreover, the administrative class that runs the University is notorious for its corruption and lack of integrity.<sup>68,69,70,71</sup>

**DEFAMATION / HATE MAIL.** I was harassed by partisan journalists who violated my right to privacy and published defamatory articles about me,<sup>72</sup> for no other reason but because I was engaging in *pro bono*

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<sup>65</sup> The current president of Modern Language Association is Judith Butler, a radical feminist who has illegally sought to protect a female professor accused of sexual harassment by a male student. MLA approval is crucial for English professors.

<https://leiterreports.typepad.com/blog/2018/06/blaming-the-victim-is-apparently-ok-when-the-accused-is-a-feminist-literary-theorist.html>

<sup>66</sup> The email exchange between Margaret Russett and Devin Griffiths proves this point. The English Department has agreed in advance to sabotage my academic career, *before* I began writing my dissertation.

<sup>67</sup> Appellate opinions (certified for publication) as follows.

<https://law.justia.com/cases/california/court-of-appeal/2016/b262917.html>

<https://law.justia.com/cases/california/court-of-appeal/2018/b271834.html>

<https://law.justia.com/cases/california/court-of-appeal/2019/b283406.html>

<sup>68</sup><https://www.usatoday.com/story/news/nation/2019/04/30/college-admissions-scandal-davina-bruce-isackson-plead-guilty-varsity-blues-ucla-usc/3625428002/>

<sup>69</sup> <https://www.latimes.com/sports/la-sp-usc-college-bribery-scandal-20190312-story.html>

<sup>70</sup> <https://www.washingtonexaminer.com/opinion/usc-is-a-corrupt-tax-exempt-hedge-fund>

<sup>71</sup><https://www.insidehighered.com/quicktakes/2018/06/07/official-usc-knew-med-dean-led-double-life>

<sup>72</sup><https://splinternews.com/activist-fighting-anti-male-bias-on-campus-really-doe-1826424754>

advocacy to help an underrepresented minority (men). These partisan journalists refused to cover basic facts which challenge their narrative.<sup>73</sup> These events caused me so much distress that I was briefly hospitalized due to an allergic shock **(F1)**.

I received hate mail and violent messages due to their partisan coverage. I received messages that attack my immigration status and my ethnicity. I also received an outpouring of hate that attacked me for being a white male. The defamation was significant: for example, I was compared to mass-murderers and I received rape/murder threats **(F2)**.

However, despite these acts of retaliation, I am aware of widespread public support behind my complaints. I have received non-partisan coverage on many occasions.<sup>74,75,76,77,78,79</sup> I have also received 100+ supportive messages.

**SOCIAL MEDIA CENSORSHIP.** One user on Twitter made a rape threat against my mother, who is struggling with cancer **(F3)**. Twitter took no action against him. However, I was permanently banned from Twitter without any rational explanation. Twitter's human moderators reviewed the ban and upheld it **(F4)**.

**DHS SURVEILLANCE.** I received a visit on my LinkedIn profile from an Executive Director, working for the Department of Homeland Security **(F5)**. Richard Allison, an activist, speculated that the director in question is a partisan federal employee called Elena Steinke **(F6)**.

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<sup>73</sup> [https://docs.wixstatic.com/ugd/ea7b71\\_16c1692eab8844218afdb2b419622827.pdf](https://docs.wixstatic.com/ugd/ea7b71_16c1692eab8844218afdb2b419622827.pdf)

<sup>74</sup> <https://www.foxnews.com/us/yale-being-probed-by-doe-accused-of-toxic-environment-against-men>

<sup>75</sup> <https://www.dailywire.com/news/46458/foia-request-reveals-boston-title-ix-office-has-ashe-schow>

<sup>76</sup> <https://pjmedia.com/trending/apas-masculinity-guidelines-now-facing-title-ix-challenge/>

<sup>77</sup> <https://www.usatoday.com/story/opinion/2019/02/12/colleges-universities-discriminate-men-title-ix-complaints-toxic-masculinity-column/2831834002/>

<sup>78</sup> <https://www.campusreform.org/?ID=10899>

<sup>79</sup> <https://www.dailywire.com/news/35081/professor-who-wrote-why-cant-we-hate-men-article-ashe-schow>

## RELIEF & EPILOGUE

OCR may issue any form of relief as it deems proper. It is my understanding that the previous OCR investigation, #09-17-2446, involved an informal "closure with change." Sadly, the University has become even more hostile in terms of gender partisanship since.

Restoring my dignity as a human being is more important than any specific form of monetary/injunctive relief. I want justice. The verdict is more important than the relief.

K.C.P.

21 May, 2019