



National Coalition For Men (NCFM)

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To Whomever It May Concern,

Please accept this Title IX complaint against Georgetown University.
We are submitting this complaint to the Washington Headquarters
Office, which has original jurisdiction over the matter.

Please acknowledge by email receipt of this submission.

Respectfully,

Harry Crouch
President

17 pages including cover letter.

cc: Assistant Secretary, Kenneth Marcus

kenneth.marcus@ed.gov

cc: Office for Civil Rights Electronic Submission Portal

ocr@ed.gov

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SUMMARY

Georgetown University is in violation of Title IX because it offers resources, funding, fellowships, and scholarships that are available to women only, even though men are a minority both nationwide [42%]¹ and at Georgetown University [44%].^{2,3} Women are the overrepresented sex nationwide; they are also the majority of law students⁴ and medical students.⁵ New civil rights data published by the Department of Education makes it clear that concerns over the underrepresentation of women in STEM education are outdated.⁶ 77% of all teachers in the public education system are women, and the numbers are increasing.⁷ Girls have higher grades than boys in all categories.⁸ According to institutions that release such data, 99% of all individuals sanctioned under Title IX theory are male.⁹

Men are beginning to face significant problems in the workplace due to this disparity in terms of college degree attainment. Women who apply to STEM degrees are far more likely to be hired than men.¹⁰ A recent study found out that women are 36% more likely than men to receive a job offer.¹¹ Men work in more dangerous jobs and they are more likely to suffer permanent or grievous harm.¹² The gender pay gap myth ignores many variables.¹³ Even if the gender gap were true, the fact remains that women control more wealth than men (60% of all personal wealth) and that women spend more money than men (85% of all customer purchases).¹⁴

¹[>>https://nces.ed.gov/programs/digest/d16/tables/dt16_322.20.asp](https://nces.ed.gov/programs/digest/d16/tables/dt16_322.20.asp)

²<https://www.collegefactual.com/colleges/georgetown-university/student-life/diversity/chart-gender-diversity.html>

³<https://www.usnews.com/best-colleges/georgetown-university-1445>

⁴<https://www.nytimes.com/2016/12/16/business/dealbook/women-majority-of-us-law-students-first-time.html>

⁵https://www.washingtonpost.com/local/social-issues/women-are-now-a-majority-of-entering-medical-students-nationwide/2018/01/22/b2eb00e8-f22e-11e7-b3bf-ab90a706e175_story.html?utm_term=.3873f1eff392

⁶<https://www.ed.gov/news/press-releases/us-department-education-releases-2015-16-civil-rights-data-collection>

⁷<https://nces.ed.gov/pubs2017/2017072.pdf>

⁸<http://www.apa.org/news/press/releases/2014/04/girls-grades.aspx>

⁹Stanford: <https://news.stanford.edu/2018/02/27/provost-issues-campus-wide-report-title-ix-sexual-harassment-cases/>

Yale: [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)

¹⁰<http://www.pnas.org/content/early/2015/04/08/1418878112>

¹¹<http://insight.movemeon.com/insight-analysis/gender/women-more-likely-to-get-hired-than-men>

¹²[>>https://www.forbes.com/sites/timworstall/2016/12/21/heres-your-gender-pay-gap-fatal-occupational-injuries/#3c5143d36c3e](https://www.forbes.com/sites/timworstall/2016/12/21/heres-your-gender-pay-gap-fatal-occupational-injuries/#3c5143d36c3e)

¹³ <https://www.wsj.com/articles/the-wage-gap-myth-that-wont-die-1443654408>

¹⁴**Sources:** Federal Reserve, MassMutual Financial Group, BusinessWeek, Gallup.

<https://girlpowermarketing.com/statistics-purchasing-power-women/>

LEGAL THEORY

The Supreme Court prohibits gender discrimination against men.¹⁵ The Second Circuit of Appeals has clarified that discrimination against men is unconstitutional even in the absence of malicious intent and even for a short period of time.¹⁶ The Sixth Circuit of Appeals has clarified that unlawful anti-male bias can be inferred when the overwhelming majority of the impacted parties are male.¹⁷

The plain language of Title IX, predicated in 34 CFR §106, prohibits any institution from funding/sponsoring discriminatory scholarships, programs, fellowships and initiatives.¹⁸ Title IX prohibits recipients from listing, soliciting, approving, sponsoring discriminatory scholarships even if they are entirely external to the University.¹⁹ Title IX prohibits discrimination in terms of counselling.²⁰ Title IX prohibits discrimination in terms of health benefits.²¹ Title IX prohibits any kind of *preference* for admission in any educational entity, or its substituent chapters.²² In determining whether discrimination occurs, Title IX requires an assessment of the *overall effect*.²³

There are Title IX precedents for this complaint. For example, Michigan State University in 2016 converted a women-only study space in the Michigan Union to a study lounge that is now available to students of all genders, following a Title IX and civil rights complaint.²⁴ Texas A&M University was subject to a Title IX complaint because it eliminated its last

¹⁵ *Craig v. Boren* (1976). *Sessions v. Morales-Santana* (2017).

¹⁶ "A defendant is not excused from liability for discrimination because the discriminatory motivation does not result from a discriminatory heart, but rather from a desire to avoid practical disadvantages that might result from unbiased action. A covered university that adopts, even temporarily, a policy of bias favoring one sex over the other in a disciplinary dispute, doing so in order to avoid liability or bad publicity, has practiced sex discrimination, notwithstanding that the motive for the discrimination did not come from ingrained or permanent bias against that particular sex" (*Doe v. Columbia University*, p. 26, footnote 11).

¹⁷ "The statistical evidence that ostensibly shows a pattern of gender-based decision-making and external pressure on Miami University supports at the motion-to-dismiss stage a reasonable inference of gender discrimination ... nearly ninety percent of students found responsible for sexual misconduct between 2011 and 2014 have male first-names" (*Doe v. Miami University*, p. 15).

¹⁸ Such is the overall intent of CFR § 106.

¹⁹ CFR § 106.37.

²⁰ CFR § 106.36.

²¹ CFR § 106.39.

²² CFR § 106.22.

²³ CFR § 106.37.

²⁴ https://www.washingtonpost.com/news/wonk/wp/2016/07/28/a-male-professor-says-this-women-only-study-lounge-is-sexist-and-illegal/?utm_term=.e559327d8b60

male-only dorm while preserving multiple female-only dorms.²⁵ The press has reported that the Department of Education is investigating Yale University,²⁶ and the University of Southern California,²⁷ for Title IX violations in similar issues. The Oregon Department of Education has ordered the South Eugene High School to replace the title “Axemen” with “Axe” in order to promote inclusivity.²⁸ In a previous Title IX precedent, the University of Southern California agreed to change the name of the Center for Women and Men (implying a hierarchy of victimhood) into *Relationship and Sexual Violence Prevention Services*. The gender-neutral title had a substantial, positive effect on male participation in the Center.²⁹

We do not allege disparate impact per se, but we maintain that disparate impact (in conjunction with other specifics) may augment an inference of discrimination. Nowhere in this complaint do we infer discrimination based on disproportionate enrolment alone.³⁰ The fact that these scholarships and programs are endorsed as “Women’s” is sufficient, in and of itself, to infer disparate treatment. Such endorsement has a clearly dissuasive/discriminatory effect on males. As per OCR policy, hostile environment can occur even in the absence of intent to harm or even if the hostility is not directed at a particular target. Nor does hostile environment require sexual intent: gender animus or hostility based on sexual stereotypes is sufficient to trigger Title IX liability (*Dear Colleague Letter*, 2010, p. 8). This includes situations in which “students are harassed for exhibiting what is perceived as a stereotypical characteristic for their sex” (*ibid*).

Given the *overall effect*, no reasonable person would inquire whether it is necessary to identify any male students who have specifically applied to these programs (and who have specifically received rejections) before the United States can take corrective action against the discrimination. For example, an organization with a “Whites Only” sign triggers Title VII/Title VI liability even in the absence of prospective plaintiffs who “go through the motions of submitting an application.” Supreme Court doctrine is unambiguous on this question: in the presence of clearly discriminatory practices, the victims of discrimination are not the small

²⁵ <https://www.thecollegefix.com/post/31646/>

²⁶ <https://www.campusreform.org/?ID=10899>

²⁷ <https://www.campusreform.org/?ID=10931>

²⁸ http://www.oregonlive.com/education/index.ssf/2018/02/eugene_officials_chop_south_eu.html

²⁹ San Francisco Regional Office, Docket #09-16-2128.

³⁰ The ratio of female/male enrolment is relevant only in terms of determining the “underrepresented sex.” Women are no longer the “underrepresented sex” in colleges.

class of people who “subject themselves to personal rebuffs” but all persons who are negatively effected despite their “unwillingness to engage in a futile gesture.” Put in other words, OCR **cannot** limit itself to offering redress to men who specifically apply to programs which refer to themselves as “Women Only” and receive rebuffs. Nor should OCR decline to investigate exclusionary programs which maintain all-female composition despite meaningless disclaimers or ambiguous language.

If an employer should announce his policy of discrimination by a sign reading "Whites Only" on the hiring-office door, his victims would not be limited to the few who ignored the sign and subjected themselves to personal rebuffs. The same message can be communicated to potential applicants more subtly but just as clearly by an employer's actual practices - by his consistent discriminatory treatment of actual applicants, by the manner in which he publicizes vacancies, his recruitment techniques, his responses to casual or tentative inquiries, and even by the racial or ethnic composition of that part of his work force from which he has discriminatorily excluded members of minority groups. When a person's desire for a job is not translated into a formal application solely because of his unwillingness to engage in a futile gesture he is as much a victim of discrimination as is he who goes through the motions of submitting an application.

Teamsters v. United States, 431 U.S. 324, 365 (1977)

The analogy presented herein (comparing “Whites Only” programs to “Women Only” programs) is legally binding. The Congress made little meaningful distinction between sexual discrimination and racial discrimination in qualifying the Civil Rights Act of 1964.³¹

Another binding Supreme Court precedent which rules out the necessity of identifying an entire class before challenging openly discriminatory policies is *Weinberger v. Wiesenfeld* (1975). In this precedent, the Supreme Court upheld a district court ruling in which a widower was granted standing to challenge an openly discriminatory policy on behalf of his class (i.e. men).

“Wiesenberg applied for social security benefits for himself and his son, and was told that his son could receive them but that he could not. [...] He claimed that the relevant section of the Social Security Act unfairly discriminated on the basis of sex and sought summary judgement. [...] Appellee filed this suit in February 1973, *claiming jurisdiction under 28*

³¹ The analogy is legally binding because Title IX of the Education, which prohibits discrimination on the basis of sex in educational institutions, uses the language of Title VI, which prohibits discrimination on the basis of race or national origin. 117 CONG. Rec. 30,156 (1971).

U.S.C. 1331, on behalf of himself and of all widowers similarly situated. [emphasis added]. He sought a declaration that 402 (g) is unconstitutional to the extent that men and women are treated differently, an injunction restraining appellant from denying benefits under 402(g) solely on the basis of sex, and payment of past benefits [...] After the three-judge court determined that it had jurisdiction, it granted summary judgement in favor of appellee, and issued an order giving appellee the relief he sought.”

Weinberger v. Wiesenfeld, 420 U.S. 636 (1975)³²

There are other very real and very pressing reasons which make it not only impractical but also impossible to identify a class of grievants, or even individual male complainants. Male students/professors who raise such concerns are often silenced with extreme prejudice. Google terminated a male engineer, James Damore, for criticizing aspects of the company’s “diversity culture” in the mildest manner possible.³³ Lake Ingle, a male student, was kicked out of class in Indiana University for engaging in civil disagreement with a radical feminist professor (March 2018).³⁴ A board member at the University of Virginia (Fred W. Scott Jr.) was forced to resign from his position because he criticized female-only programs at the University (August 2018).³⁵ A male professor (Rick Mehta) was fired from Acadia University because of “sexist” comments (September 2018).³⁶ Catholic University of America suspended a male dean for merely questioning Julie Swetnick, who made transparently false allegations against the Supreme Court nominee, Brett Kavanaugh (October 2018).³⁷

When the cost of free speech is so high and the chilling effect is so potent, it would be unreasonable to shift the burden of gathering elusive evidence upon the complaining parties. The incidents cited above are very recent and relevant in terms of understanding the impact of the chilling effect in question. Moreover, Georgetown University has resisted the disclosure of

³² <https://supreme.justia.com/cases/federal/us/420/636/#tab-opinion-1951258>

³³ <http://www.foxnews.com/tech/2018/01/09/james-damore-sues-google-claims-tech-giant-discriminates-against-white-conservative-men.html>

³⁴ <http://www.foxnews.com/us/2018/03/12/college-student-kicked-out-class-for-telling-professor-there-are-only-two-genders.html>

³⁵ “There are no United White People College Funds or White Students' Alliances or Men Against Drunk Driving. Even at a ‘tolerant university’ ... especially there! Women's Initiative [sic]. We both support it. Is there a Men's Initiative???”

<https://www.insidehighered.com/quicktakes/2018/09/06/uva-center-board-member-resigns-after-explaining-why-women-didnt-want-go-shoe>

³⁶ <https://www.andrewlawton.ca/pro-free-speech-professor-rick-mehta-fired-by-acadia-university/>

³⁷ <https://thehill.com/blogs/blog-briefing-room/news/409090-catholic-university-suspends-dean-over-comment-that-degraded>

vital civil rights data in the past, making it even more impractical for a reasonable complainant to obtain such data.³⁸

The complaint is timely because all programs listed below involve ongoing and systematic gender discrimination. Moreover, we are requesting indefinite waivers on each and every allegation. DOE: OCR³⁹ and DOJ: CRD⁴⁰ can reopen “cold” cases whenever proper (even if they were previously dismissed) and waive the deadline under a series of circumstances. Specifically, cases are reopened whenever there is compelling national interest and/or overwhelming public support behind the issue. There is indeed compelling national interest in stopping the demographic decline of men in the higher education system. An undereducated class of men are more likely to end up in criminal activity, less likely to support their dependents, and less likely to support the infrastructure of the nation.

Moreover, this complaint proposes a public policy issue – and there is *significant* public support behind the proposal. For example, the investigation against Yale University generated widespread press coverage. A news article by Fox News gathered 1,500+ positive comments.⁴¹ A video by Stephanie Hamill received 1.4 million views.⁴² Two articles on the same topic (by Campus Reform) were shared 12,000+ times on social media.⁴³ The majority of respondents in a heavily biased online poll reported that Yale *does* indeed discriminate against men (56.8%).⁴⁴ Under these circumstances, no agent of United States has the liberty to shirk his/her duty to the democratic will of the people by refusing to prosecute complaints of this nature.

The complaint seeks to eliminate gender discrimination against men without jeopardizing the civil rights of women. When injunctive relief is granted, the female majority will still be able to compete with the male minority on equal footing.

³⁸ “Repeated attempts to obtain data on any gender inequity at Georgetown have been rebuffed or ignored by campus officials.” <https://www.thecollegefix.com/georgetown-creates-task-force-to-advance-gender-equity-but-refuses-to-discuss-gender-statistics/>

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

⁴⁰ <https://www.thecrimson.com/article/2018/5/23/yir-admissions-analysis/>

⁴¹ <http://www.foxnews.com/us/2018/05/18/yale-being-probed-by-doe-accused-toxic-environment-against-men.html>

⁴² <https://www.facebook.com/Americanvoicesthedailycaller/videos/683586881973534/>

⁴³ <https://www.campusreform.org/?ID=11249> && <https://www.campusreform.org/?ID=10899>

⁴⁴ <https://thetylt.com/politics/yale-discriminate-against-men>

LIST OF DISCRIMINATORY PROGRAMS

The list below is neither exhaustive nor final. OCR should request information regarding all women-only spaces, scholarships, fellowships, initiatives, departments, programs, lectureships, committees, groups, and events that are currently active at Georgetown University.^{45,46} Title IX also prohibits discrimination in programs which are externally funded if these programs use campus space and/or receive any other form of institutional endorsement.

1. **Georgetown University** violates Title IX by expressing an unlawful preference for women in its employment/hiring practices: “it is the goal of Georgetown University and its departments to advertise, recruit vigorously, and employ qualified candidates, *particularly* minority persons, *women*, veterans, and persons with disabilities.”^{47,48,49} This bias is systemic, since all applications go through the affirmative action process. Injunctive relief for this allegation would consist of removing all such discriminatory language and abolishing the collection of data on the basis of gender. Georgetown currently collects such data.⁵⁰

2. **Georgetown University** violates Title IX by endorsing external “outreach” organizations, which are exclusionary on the basis of sex, for the purposes of its affirmative action recruitment practices. Georgetown maintains ties with groups which are women only, without maintaining ties with any male-only groups.⁵¹ Associating with these organizations counts as “significant endorsement” because the University forms financial and reputational ties with them by delegating recruitment practices to their counsel.
 - a. Asian Women in Business
 - b. American Business Women’s Association
 - c. Accounting and Financial Women’s Alliance
 - d. Financial Women’s Association
 - e. National Women’s Studies Association

⁴⁵ “The compliance review regulations afford OCR broad discretion to determine the substantive issues for investigation and the number and frequency of the investigations” (*Case Processing Manual*, p. 20). OCR is already using such discretion to open compliance reviews against institutions which allegedly discriminate against women.

⁴⁶ Athletic opportunities/scholarships are subject to a complex system of inquiry of their own.

⁴⁷ <https://ideaa.georgetown.edu/facultyhiringprocedures>

⁴⁸ This complaint does not raise any Title II or Title VI violations.

⁴⁹ Any preference on the basis of sex in admissions/recruitment violates Title IX, as per CFR § 106.22.

⁵⁰ <https://georgetown.app.box.com/s/0vi5zvonin51emmybmtz>

⁵¹ <https://georgetown.app.box.com/s/1az1cio0u9id68hkjid585gvcj06gvwp>

- f. Society of Women Engineers⁵²
- g. Association for Women in Computing
- h. Women in Technology
- i. Organization of Women in International Trade
- j. American Association of Women Dentists

3. **The Cawley Career Center** violates Title IX by offering career counselling for women, with no similar resources for men.⁵³ Every single resource/group listed by the Center is discriminatory against men both in terms of agenda and membership.⁵⁴ Title IX prohibits discrimination in terms of professional counselling, and yet Georgetown University does not offer any professional counselling or networking opportunities for the male minority.

4. **The Georgetown Institute for Women, Peace, and Security** violates Title IX.⁵⁵ The institute was founded by Hillary Rodham Clinton.⁵⁶ The organization's agenda focuses exclusively on women's well-being and rights^{57,58} while neglecting the global suffering of men.⁵⁹ Women were overrepresented in a recent symposium held by institute (17/18).⁶⁰ Women are overrepresented among advisory board members (18/22).⁶¹ All published/endorsed research is from female authors.^{62,63} Partners include women-only organizations (Civil Society Working Group on

⁵² OCR has consistently agreed to prosecute the Society of Women Engineers in currently pending investigations (against the University of Southern California and Princeton University, for example). The other organizations are characteristically similar to the Society of Women Engineers. Georgetown University does not affiliate itself with any professional male-only organizations. The choice is deliberate on their behalf, not coincidental. Often, the same groups that aggressively push for female-only organizations also seek to eliminate male-only organizations.

⁵³ <https://careercenter.georgetown.edu/diversity-career-resources>

⁵⁴ <https://careercenter.georgetown.edu/career-resources-women>

⁵⁵ <https://giwps.georgetown.edu/>

⁵⁶ <https://giwps.georgetown.edu/founding-story/>

⁵⁷ <https://giwps.georgetown.edu/the-index/>

⁵⁸ <https://giwps.georgetown.edu/priority/economic-empowerment/>

⁵⁹ For example, men live shorter lives than women worldwide.

⁶⁰ <https://giwps.georgetown.edu/event/womens-informal-involvement-in-peace-processes/>

⁶¹ <https://giwps.georgetown.edu/advisory-board/>

⁶² http://giwps.georgetown.edu/resources/?fwp_resource_type=internal

⁶³ Author names include (2011-2018): Jeni Klugman, Jennifer Parsons, Tatiana Melnikova, Kelly McFarland, Allison Peters, Jahanara Saeed, Rebecca Turkington, Agathe Christien, Sophie Huve, Joana Cook, Louise Olsson, Anna Bjorsson, Margaret Jenkins, Ashley Binetti, Claire Charamnac, Mayesha Alam, Rukmani Bhatia, Briana Mawby, Patty Chang, Roslyn Warren, Alexandra Safir, Chloe White, Segolene Dufour-Genneson, Erica Vasquez, Annica Kronsell, Nicole Detraz, Valerie M. Hudson, Bonnie Spanvill, Mary Caprioli, Jacqui True, Fionnuala Ni Aolain, Dina Francesca Haynes, Naomi Cahn, Janie L. Leatherman (*ad nauseam*). The Institute has not sponsored a single male author since its foundation.

Women, Global Women’s Leadership Initiative, UN Women, Women’s Democracy Network, *et cetera*).⁶⁴

- a. **The International Council on Women’s Business Leadership** violates Title IX. The *overall* effect is discriminatory. All council members are women (35/35).⁶⁵

5. Georgetown Women’s and Gender Studies⁶⁶ violates Title IX because it has an overall hostile effect against male participants.

- a. The name is discriminatory (invokes women, but not men).
- b. There is no Men’s Studies at Georgetown University.
- c. Their mission statement mentions “women” and “feminism,”⁶⁷ but not men (nor any gender-specific issue relevant to men). “Feminism” is defined as “organized activity on behalf of women's rights and interests.”⁶⁸
- d. All core faculty members are women (12/12).⁶⁹ All outstanding senior awards have been granted to women (19/19).⁷⁰
- e. Their agenda is preoccupied with women’s issues only, which creates a hostile/dissuasive effect against male participants: all current courses are about women.⁷¹
- f. In addition, the program explicitly states ideological preferences in recruitment⁷² and this preference has a chilling effect upon the First Amendment rights of prospective applicants/scholars. Put in other words, the program stifles viewpoint freedom in academia by requiring applicants to teach “feminism.” An alumna, Amelia Irvine, has criticized this lack of viewpoint diversity.⁷³

6. Georgetown Women’s Center⁷⁴ violates Title IX.

- a. The name is discriminatory (invokes women, but not men).
- b. There is no Men’s Center at Georgetown University.

⁶⁴ <https://giwps.georgetown.edu/partners/>

⁶⁵ <https://giwps.georgetown.edu/womens-business-council/>

⁶⁶ <https://wgsp.georgetown.edu/>

⁶⁷ <https://wgsp.georgetown.edu/about>

⁶⁸ <https://www.merriam-webster.com/dictionary/feminism>

⁶⁹ <https://wgsp.georgetown.edu/faculty>

⁷⁰ <https://wgsp.georgetown.edu/students/outstandingsenioraward>

⁷¹ <https://wgsp.georgetown.edu/courses/current>

⁷² <https://chroniclevitae.com/jobs/0000431081-01>

⁷³ <https://www.washingtonexaminer.com/red-alert-politics/womens-studies-emphasizes-activism-over-academics-my-experience-at-georgetown-university>

⁷⁴ <https://womenscenter.georgetown.edu/about-us#>

- c. The Center’s goal is “to support, educate and empower women” and “to address matters of particular concern to women.” All administrators are women.⁷⁵ All members in a VOICE retreat were women.⁷⁶
- d. Their agenda is preoccupied with women’s issues only.⁷⁷

7. Georgetown Women’s Alliance⁷⁸ violates Title IX.

- a. All committee members and student fellows are women.⁷⁹
- b. All past events involve women’s issues and all participants were women.⁸⁰
- c. Grants are available to women only: the purpose of the grants is to “feature the research or projects directed by women at Georgetown” and “connect women across constituencies.”⁸¹ All recipients of the fellowship program have been women.⁸²
- d. The program endorses an article which argues that women are better leaders than men.⁸³

8. Georgetown Women’s Leadership Institute⁸⁴ violates Title IX.

- a. The name is discriminatory/dissuasive. There is no similar program for men at Georgetown University.
- b. All team members are women.⁸⁵
- c. All past events involve women’s issues and female participants.⁸⁶
- d. All speakers and participants in a recent event were women.⁸⁷
- e. All publications involve women’s issues and women are overrepresented among authors.⁸⁸
- f. All individuals in a representative photo were women (88/88).⁸⁹
- g. While it is true that there are male affiliates,⁹⁰ OCR must assess the totality of the evidence in judging the circumstances.

⁷⁵ <https://womenscenter.georgetown.edu/about-us#>

⁷⁶ <https://womenscenter.georgetown.edu/retreats#>

⁷⁷ <https://womenscenter.georgetown.edu/WHM2016#>

⁷⁸ <http://womensalliance.georgetown.edu/>

⁷⁹ <http://womensalliance.georgetown.edu/steering-committee>

⁸⁰ <http://womensalliance.georgetown.edu/events>

⁸¹ <http://womensalliance.georgetown.edu/grants>

⁸² <http://womensalliance.georgetown.edu/fellows>

⁸³ <https://www.mprnews.org/story/2013/07/23/daily-circuit-women-in-senate>

⁸⁴ <http://guwli.georgetown.edu/>

⁸⁵ <http://guwli.georgetown.edu/about-2/guwli-team/>

⁸⁶ <http://guwli.georgetown.edu/impact-conferences-and-programs/conferences/>

⁸⁷ <https://www.facebook.com/GUWLI/photos/a.1559171551041087/1890245844600321/?type=3&theater>

⁸⁸ <http://womensleadershipinstitute.georgetown.domains/research/scholar-papers/>

⁸⁹ http://womensleadershipinstitute.georgetown.domains/wp-content/uploads/2014/05/DSC_0359.jpg

⁹⁰ <http://guwli.georgetown.edu/about-2/affiliated-faculty/>

9. **Georgetown Graduate Women in Business**⁹¹ violates Title IX.

- a. The name is discriminatory/dissuasive. There is no similar program for men at Georgetown University.
- b. There is only token male participation in their events (for example, 1/31).⁹²
- c. All board members are women, except a token male (1/12).⁹³
- d. Their agenda is preoccupied with women's issues only.

10. **Georgetown University Women in Medicine**⁹⁴ violates Title IX.

- a. The name is discriminatory/dissuasive. There is no similar program for men at Georgetown University.
- b. The program restricts membership on the basis of sex.⁹⁵
- c. Their agenda is preoccupied with women's issues only.⁹⁶
- d. Their publications are about women's issues only, and the majority of authors are women.⁹⁷
- e. The program offers various awards which are exclusionary against men.⁹⁸
 - i. **The John Eisenberg Career Award** is "given annually to four *women* faculty ... a competitive selection process in which *women* who show the most potential for leadership."
 - ii. **School for Nursing & Health Studies Mentorship Award** requires being a "female faculty member" as a criterion for eligibility.
 - iii. **The Karen Gale Outstanding Achievement Award** is available to "a female faculty member within GUMC/GUH."

11. **Women's Forum at Georgetown University**⁹⁹ violates Title IX.

- a. The name is discriminatory/dissuasive. There is no similar program for men at Georgetown University.
- b. All speakers in the 2018 event were women (73/73).¹⁰⁰

⁹¹ <https://www.georgetowngwib.com/>

⁹² https://static1.squarespace.com/static/59c142b0268b969d6e7ef6dd/5a0b4989e4966b396b5259e0/5a0b4c5753450ab00cbf0060/1510690539400/DSC_6215.jpg?format=1500w

⁹³ <https://www.georgetowngwib.com/location/>

⁹⁴ <https://gwim.georgetown.edu/>

⁹⁵ *The mission of Georgetown Women in Medicine (GWIM) is to promote the professional advancement of women faculty at Georgetown University Medical Center (GUMC).*

⁹⁶ <https://gwim.georgetown.edu/events>

⁹⁷ <https://gwim.georgetown.edu/links>

⁹⁸ <https://gwim.georgetown.edu/annual%20awards>

⁹⁹ <https://womensforum.georgetown.edu/>

- c. Among 100+ attendees, only the cameraman was male.¹⁰¹
- d. Read literally, the mission statement excludes men.¹⁰²

12. Georgetown Women in Science violates Title IX. Even if this program is merely promotional, it confers a reputational benefit upon the promoted persons.

- a. The plain language is discriminatory.¹⁰³
- b. All highlighted individuals are women.¹⁰⁴
- c. All events are about women and all speakers are women.¹⁰⁵

13. Women’s Law and Public Policy Fellowship Program¹⁰⁶ violates Title IX.

- a. All advisory board members are women.¹⁰⁷
- b. All scholars have found employment/placement in organizations which either discriminate against men or which are solely preoccupied with the gender issues of women.¹⁰⁸
- c. Georgetown does not offer any scholarships which aim to advance the civil rights of men.
- d. Men are severely underrepresented among applicants/recipients because the name and the agenda of the organization has a dissuasive effect.

14. Women’s Legal Alliance violates Title IX because the plain language is discriminatory.¹⁰⁹

¹⁰⁰ *The mission of Georgetown Women in Medicine (GWIM) is to promote the professional advancement of women faculty at Georgetown University Medical Center (GUMC).* <https://gwim.georgetown.edu/>

¹⁰¹ Picture 7: <https://womensforum.georgetown.edu/wf/2018/photo-gallery#expanded>

¹⁰² *“Georgetown University invites you to attend the first university-wide Women's Forum ... uniting smart, passionate women from across the country and abroad ... it is our goal that the Women's Forum 2018 will serve as a true recognition of women's progress ... we plan to showcase women leaders in law, business, government ...”*

<https://womensforum.georgetown.edu/wf/2018>

¹⁰³ *“The university also continues to support its female students and faculty through grants, scholarships and other means ... The university's long and storied record of exemplary work by women in the sciences continues with well-funded basic and applied research and efforts that include building a home for interdisciplinary gender-based research, recognizing annually its outstanding women in medicine and promoting science and technology for girls worldwide.”*

<http://www.georgetownuniversityfeatures.com/women-in-science/>

¹⁰⁴ *Ibid.*

¹⁰⁵ <https://www.georgetown.edu/news/women-in-science>

¹⁰⁶ <https://www.law.georgetown.edu/wlppfp/>

¹⁰⁷ <https://www.law.georgetown.edu/wlppfp/about-us/advisory-board/>

¹⁰⁸ <https://www.law.georgetown.edu/wlppfp/wlppfp-us-fellowships/placement-organizations/>

¹⁰⁹ *“The Georgetown Women’s Legal Alliance (“WLA”) connects all women who are affiliated with the Law Center, welcoming alumnae, students, and professors as equals. We support the women of Georgetown Law by forging stronger and deeper relationships among them, by advocating for equality on campus, and by working together to empower and advance women as leaders in the legal profession.”* <https://www.law.georgetown.edu/alumni/get-involved/womens-legal-alliance/>

15. Women’s Rights International Clinic¹¹⁰ violates Title IX. All members are women and their agenda is preoccupied with women’s issues only.¹¹¹ The word “man” does not occur except in the most pejorative context on their publications and website.

16. Georgetown Women of Color violates Title IX.¹¹² The name is discriminatory and all members are women.¹¹³

17. Georgetown Women’s Foreign Policy Group¹¹⁴ violates Title IX because the plain language is discriminatory.¹¹⁵

18. Women Who Code violates Title IX.¹¹⁶ The name is discriminatory, the mission statement refers to women (but not men), and all members are women (15/15).¹¹⁷

¹¹⁰ <https://www.law.georgetown.edu/experiential-learning/clinics/international-womens-human-rights-clinic/>

¹¹¹ <https://www.law.georgetown.edu/experiential-learning/clinics/international-womens-human-rights-clinic/clinic-staff-faculty/>

¹¹² This complaint does not allege racial bias. Injunctive relief might consist in transforming the club into “People of Color,” for example.

¹¹³ <https://www.facebook.com/guwomenofcolor/>

¹¹⁴ <https://sfs.georgetown.edu/womens-foreign-policy-group/>

¹¹⁵ *It is crucial to ensure that women’s voices are heard and women leaders are fully engaged on key policy decisions. At WFPG, we advance women’s leadership and highlight their contributions through international issues programs and mentoring. We believe that through highlighting women leaders in foreign policy, we provide important role models for the next generation and create a vital network of women from different sectors, generations, and backgrounds.*

¹¹⁶ <http://guwecode.georgetown.domains/>

¹¹⁷ *Ibid.*

INJUNCTIVE RELIEF

This complaint requests the following injunctive relief, in any reasonable combination thereof:

- The elimination of all female-only programs (and all programs that provide special preferences to females) within a reasonable period of time.
- The conversion of all discriminatory programs into gender-neutral programs within a reasonable period of time. If such conversion occurs, the names of the programs must be changed into gender-neutral titles, and the programs must begin to actively recruit male students and professors. There is OCR precedent for such conversion.¹¹⁸
- The creation of male-specific or male-focused programs and/or scholarships and/or research centres to offset the balance, whenever proper.
- Any other form of injunctive relief, whenever proper (such as a future ban on all such programs).

¹¹⁸ In a previous OCR precedent, the University of Southern California agreed to change the name of the Center for Women and Men (implying a hierarchy of victimhood) into *Relationship and Sexual Violence Prevention Services* (#09-16-2128). The name change had a substantial, positive effect on male participation in the Center.

ADDENDUM A
(LIST OF DISCRIMINATORY PROGRAMS)

The list is neither exhaustive nor final. OCR should request information regarding all women-only spaces, scholarships, fellowships, initiatives, departments, programs, lectureships, committees, groups, and events that are currently active at Georgetown University.¹¹⁹ Georgetown University does not offer any male-specific programs for the male minority.

1. Georgetown University (*employment preferences, systemic*)
2. Georgetown University (*external recruitment actors*)
3. Cawley Career Center (*endorsement of discriminatory programs*)
4. The Georgetown Institute for Women, Peace, and Security
 - a. The International Council on Women's Business Leadership
5. Women's and Gender Studies Program
6. Women's Center
7. Georgetown Women's Alliance
8. Georgetown University Women in Leadership
9. Georgetown Graduate Women in Business
10. Georgetown University Women in Medicine
11. Women's Forum at Georgetown University
12. Georgetown Women in Science
13. Women's Law and Public Policy Fellowship Program
14. Women's Legal Alliance
15. Women's Rights International Clinic
16. Georgetown Women of Color
17. Georgetown Women in International Affairs
18. Women's Foreign Policy Group
19. Women Who Code

¹¹⁹ "The compliance review regulations afford OCR broad discretion to determine the substantive issues for investigation and the number and frequency of the investigations" (*Case Processing Manual*, p. 20). OCR is already using such discretion to open compliance reviews against institutions which allegedly discriminate against women.

ADDENDUM B

PUBLIC CONDEMNATION OF CHRISTINE FAIR

The National Coalition for Men condemns in the strongest terms possible the violent and ugly behaviour of Christine Fair, a Georgetown professor who has openly called for violence and terrorism against men as a class (and several specific men). The statements are as follows:

"Look at the chorus of entitled white men¹²⁰ ... All of them deserve miserable deaths while feminists laugh as they take their last gasps. Bonus: we castrate their corpses and feed them to swine? Yes.¹²¹

The National Coalition for Men has filed a prior Title IX complaint against Northeastern University.¹²² In that complaint, we specified that we were not requesting disciplinary action against Suzanne Danuta Walters. While we condemned her hateful opinion, she was not engaging in directed harassment or attempted terrorism against any particular person. No such nuance exists with Christine Fair's ugly terrorist threats, and NCFM is joining the chorus of voices who are requesting the termination of Christine Fair's appointment at Georgetown University. She is an active and ongoing security threat to her male students, she cannot be expected to teach her male students in a fair manner, and her presence creates a hostile environment against young male students on campus.

The Catholic University of America suspended a male dean for merely questioning Julie Swetnick, who made transparently false allegations against Supreme Court nominee Brett Kavanaugh (October 2018).¹²³ NCFM condemns the sexist double standards of academia, which are inconsistent with the most basic principles of fairness and democracy.

¹²⁰ NCFM has no racial policy. We are interested in defending the civil rights of all men, irrespective of political persuasion and skin colour.

¹²¹ <https://twitter.com/prageru/status/1046784093034143744/photo/1>

¹²² <https://www.dailywire.com/news/35081/professor-who-wrote-why-cant-we-hate-men-article-ashe-schow>

¹²³ <https://thehill.com/blogs/blog-briefing-room/news/409090-catholic-university-suspends-dean-over-comment-that-degraded>