

## 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.

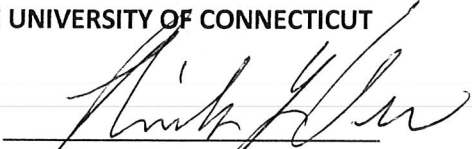
Plaintiffs acknowledge that certain UConn employees provided compassionate care and assistance to them but allege that the overall response showed deliberate indifference. Plaintiffs also acknowledge that, had the case gone to trial, UConn would have introduced evidence of its support to the plaintiffs,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

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