

## Four Current and Former Brown University Students File Federal Class Action Alleging Institutional Failures Enabling Pattern of Sexual Abuse at Prestigious Ivy League School

*Four women students – all survivors of campus sexual harassment and assault – claim Brown failed to protect them despite in-place policies and knowledge that sexual misconduct was “endemic;” assert Brown violated its own pledge to investigate sexual misconduct under Title IX; plaintiffs represented by law firms [Grant & Eisenhofer](#) and [Saltz Mongeluzzi & Bendesky](#)*

**PROVIDENCE, R.I. (August 9, 2021)** – Four women who are current or recent students at Brown University have filed a federal class action complaint against the Ivy League school alleging it has systematically and repeatedly failed to protect women from harm, including rape, “despite knowledge that sexual assault on its campus is endemic.”

The case was filed on August 6 in the U.S. District Court for the District of Rhode Island. If granted, the prospective class would include all women – estimated at upwards of 4,000 – who attended Brown starting in 2018 and were survivors of sexual violence and were then further traumatized by the “complete neglect and dysfunction” of the university’s sexual misconduct response program. The four plaintiffs are represented by leading national litigation firms [Grant & Eisenhofer](#) and [Saltz Mongeluzzi & Bendesky](#) (SMB).

The suit asserts that Brown, an Ivy League institution founded in 1764, with total enrollment of approximately 10,000, “failed and continues to fail” to protect women, “creating a campus culture that ignores and even tacitly allows trauma to be inflicted on women.” Plaintiffs allege that Brown has violated its own pledge to investigate all forms of sexual misconduct under [Title IX](#). Further, they contend that the school “actively prevented the reporting” of incidents of sexual violence, creating an inexcusable breach of trust with its students. Plaintiffs are seeking a permanent injunction to ensure strict compliance with Title IX provisions. A copy of the filed complaint can be accessed [here](#).

The named Brown survivors/plaintiffs are **Chloe Burns**, 2019 graduate; **Taja Hirata-Epstein**, 2020 graduate; **Katiana Soenen**, rising sophomore; and **Carter Woodruff**, who matriculated in 2016 and is presently on medical leave, seeking reinstatement.

“These courageous women have brought this action expressly hold Brown University to account for tolerating sexual misconduct – however, based on our extensive pre-suit investigation, we believe many more sexual violence survivors at Brown will follow.” said trial attorney [Elizabeth Bailey](#) of SMB. “Our clients are taking this necessary step, convinced that, given its previous decades of inaction, Brown will simply continue to act like it’s the 18<sup>th</sup> century and perpetuate its non-compliant, haphazard and ineffective internal grievance process. We hope this action is a call for other women who have endured similar abuse and subsequent mistreatment by college administrators to step forward and hold accountable all those responsible.” SMB founder [Robert Mongeluzzi](#) is also involved in the case and working closely with plaintiffs’ legal team.

Co-counsel [Kim Evans](#) of Grant & Eisenhofer, who heads the firm’s [civil rights group](#), said Brown has consistently ignored the voices of the four plaintiffs and others advocating for sustainable reform: “For Brown University, an Ivy League school and one of the country’s elite liberal arts institutions, to fail students who have suffered physical trauma and are in need of extra care and compassion, it is appalling.”

She added: “Not only are these young women left unsupported at an especially vulnerable time, but the school’s indifference and the impunity afforded their attackers compromises the women’s education, entrenches a code of silence around sexual assault, and reinforces humiliation and psychological stress, making their campus a hostile place.”

The four students – Carter, Chloe, Taja and Katiana – made the following joint statement about their suit against Brown:

“The so-called systems of justice and support at Brown, as well as the faculty, staff and administrators who implement them, actively perpetuate and exacerbate the injustices and harm they claim to remedy. Survivors at Brown are silenced, harmed, dismissed and discouraged from seeking justice by the university. Brown’s recent history has been punctuated by numerous student uprisings led by survivors and their allies; however, the University has never responded to these pleas for justice with anything but begrudging, minor changes to policy and procedure. Despite claiming otherwise, the university has failed to ameliorate the rampant public health crisis of sexual violence on our campus. Though we four plaintiffs speak out against Brown’s abuse today, we hope our lawsuit will bring justice to the countless survivors who have suffered at the hands of the university.”

In 2019, an independent research firm commissioned by Brown surveyed 3,100 students for their concerns regarding university sexual assault and misconduct issues. One quarter of undergraduate women reported receiving nonconsensual sexual contact while at Brown. Nearly half – 48.2% – of all students reported experiencing at least one type of offensive or inappropriate behavior of a sexual nature. And more than one in five students – 22.1% – believed that sexual misconduct was very or extremely problematic on Brown’s campus.

Brown’s poor response to sexual misconduct allegations constitutes numerous violations of Title IX of Education Amendments Act of 1972, as well as of Rhode Island law. In addition, the lawsuit alleges negligence, bad faith breach of contract, intentional infliction of emotional distress, and negligent failure to warn, train or educate. The suit contends that the training on sexual misconduct policies and procedures that Brown provides to students and employees do not meet standards set by the Education Dept.’s Office for Civil Rights; and, further, that the university’s Title IX office is woefully undersized and inadequate for a school with Brown’s population.

Brown has been at the center of decades of activism work seeking reform in the handling of sexual violence on campus. Protests against sexual violence at Brown first began in 1985, with survivors writing the names of their perpetrators on the library bathroom walls. The most recent protest was in April of this year.

About the survivors/plaintiffs:

**Carter Woodruff** – Carter entered Brown in 2016 and is currently on medical leave, seeking reinstatement in order to finish her degree in international relations. While at school, she experienced intimate partner abuse, rape, sexual assault and sexual harassment. In December 2019, Carter was sexually assaulted and recorded by a male student. She has reason to believe the school was aware he had previously assaulted other women at Brown, as the college authorities to whom she reported the incident appeared to know the perpetrator’s identity after she mentioned only his first name. Nonetheless, her assailant graduated on time and without a blemish on his record. Carter has since become active in nationwide anti-sexual violence efforts; at Brown, she has worked to provide platforms for survivors to share their stories and led student mobilization efforts and protests.

**Chloe Burns** – Chloe, who graduated in 2019 with a degree in cognitive neuroscience, discovered that the student she reported to Brown as having sexually assaulted her was approved to be a speaker at the school’s commencement ceremony that year. In fact, her assailant had been judged culpable of assault through a formal complaint and Chloe informed administrators of the finding but the school ignored her request to remove him from the list of speakers, which compelled her to bring her story to an online campus news site. Despite the finding, her assailant filed charges of retaliation through Brown’s Title IX office. His responsibility for her attack was overturned and Chloe was formally admonished for retaliation. According to the complaint, she is far from the only student who suffered reprisal from the university for publicly discussing her case.

**Taja Hirata-Epstein** – A 2020 graduate with a degree in political science, Taja endured two abusive relationships with fellow students, including one involving sexual violence. She sought permission from Brown’s Office of Residential Life to move off campus to avoid further contact with her abuser but strangely her request was denied. She then asked the school’s Title IX office to prevent him from entering her dorm, but that accommodation was never made, which led to her staying in her room for fear of encountering him. Even following a no-contact agreement with the student, Taja suffered continued

harassment from his friends. Despite her frequent appeals to Residential Life and the Title IX office to better secure her safety, both offices showed little interest in helping address her trauma, including a second relationship in which she was subject to physical and emotional abuse. As the complaint notes, the Title IX office had knowledge of a history of past concerns about this student.

**Katiana Soenen** – A rising sophomore, majoring in public health and international and public affairs, Katiana was sexually assaulted twice by Brown students. The Title IX program officer advised her against making a formal complaint of the first incident because it had happened at off-campus housing, which the university apparently concludes makes it more difficult to hold someone accountable. In June 2021, Katiana was raped at an unsanctioned fraternity house, that had previously been expelled from campus. The complaint alleges that the university was so halfhearted in its investigation that she sought outside legal representation.

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