



To:	Toya Camacho, Assistant Vice President for Institutional Diversity and Equity, and Title IX Coordinator, Williams College
From:	Allyson Kurker, Kurker Paget LLC, External Investigator
Re:	Report of investigation involving John Doe and Susan Smith
Date:	September 13, 2016

Williams College (“Williams” or the “College”) promotes compliance with its Code of Conduct, which encompasses sexual misconduct and stalking policies, in part by investigating allegations of policy violations. The contents of this document memorialize such an investigation. The contents of this report are confidential and intended to be used solely in connection with the investigation process including appeal, if applicable, and for no other purpose.

I. Background

Susan Smith, class of 2015, and John Doe, class of 2016, each bring complaints against the other alleging violations of the College’s Code of Conduct. They both deny that they engaged in conduct that violated any College policy.

II. Investigation Procedure

The Investigator interviewed the witnesses identified below on the date(s) so indicated. Each witness affirmatively consented to having his/her interview recorded.¹

1. John Doe, May 10, May 20, and July 13, 2016
2. Susan Smith, May 10, June 15 and July 26, 2016
3. Andrea Estrada (class of 2016), June 17, 2016, Witness identified by Susan Smith
4. Lady Doe, June 17, 2016, Witness identified by John Doe
5. Katherine Nunez (class of 2016), June 17, 2016, Witness identified by Susan Smith
6. Carolina Hernandez, June 28, 2016, Witness identified by Susan Smith

¹ The Investigator’s practice is to record all interviews. This practice allows the Investigator to engage witnesses in a conversation, rather than focusing attention on note-taking.

7. Theo Pippins (class of 2014), June 29, 2016, Witness identified by Susan Smith
8. Naomi Fields (class of 2015), June 29, 2016, Witness identified by Susan Smith
9. Eman Al-Ali, June 29, 2016, Witness identified by Susan Smith
10. Ava Atri (class of 2017), June 29, 2016, Witness identified by Susan Smith
11. Jacqueline Lane (class of 2016), July 17, 2016, Witness identified by John Doe and Susan Smith
12. Jackie Lee (class of 2016), July 22, 2016, Witness identified by Susan Smith
13. Rosanna Reyes, Associate Dean, July 27, 2016, Witness identified by Susan Smith
14. Owen Kay (class of 2017), August 1, 2016, Witness identified by Susan Smith
15. Elanie Wilson (class of 2015), September 1, 2016, Witness identified by Susan Smith

John and Susan identified Giselle Trivino and Matais Crespo (both class of 2015) as witnesses, but these individuals informed Toya Camacho, the College's Title IX coordinator, that they did not want to participate in this investigation. Charles Chirinos was also asked to participate in this investigation, but he did not respond to the Investigator's attempts to schedule a time to interview him.

The Investigator reviewed the following tangible evidence:

- A. Email from Susan Smith to Dean Bolton, dated October 5, 2014, attached as **Exhibit A**.
- B. Email correspondence between Susan Smith and Dean Rosanna Reyes, from October 2014 to February 2015, attached as **Exhibit B**.
- C. Text message exchange between Susan Smith and Lady Doe, dated January 21-22 2015, attached as **Exhibit C**.
- D. John Doe's September 2015 bank statement (showing money transfers to Susan Smith), attached as **Exhibit D**.
- E. Susan Smith's Statements and Invoices, attached as **Exhibit E**.
- F. Susan Smith's Apple Store invoice, attached as **Exhibit F**.
- G. Email from Professor Leyla Rouhi to Dean Sarah Bolton, dated April 14, 2016, attached as **Exhibit G**.
- H. Text message exchanges between John Doe and Susan Palaez, dated October 7, 2015 - March 12, 2016
 - a. Text messages exchanged on October 7, 2015, attached as **Exhibit H(a)**.
 - b. Text messages exchanged from October 8-9 2015, attached as **Exhibit H(b)**.
 - c. Text messages exchanged from October 12, 2015 to October 14, 2015, attached as **Exhibit H(c)**.

- d. Text messages exchanged from October 22-24, 2015, attached as **Exhibit H(d)**.
 - e. Text messages exchanged from November 7-10, 2015, attached as **Exhibit H(e)**.
 - f. Text messages exchanged from November 29 - December 3, 2015, attached as **Exhibit H(f)**.
 - g. Text message exchanged from February 10 - 14, 2016, attached as **Exhibit H(g)**.
 - h. Text messages exchanged on February 29, 2016, attached as **Exhibit H(h)**.
 - i. Text message exchanged on March 4, 2016, attached as **Exhibit H(i)**.
 - j. Text messages exchanged from March 1 - March 12, 2016, attached as **Exhibit H(i)**.
- I. Facebook message thread between John Doe and Susan Smith, dated December 6, 2015, attached as **Exhibit I**.
 - J. Facebook message thread between Lady Doe and John Doe, dated December 6, 2015, attached as **Exhibit J**.
 - K. Susan Smith's phone log from February 14, 2016 to March 13, 2016, attached as **Exhibit K**.
 - L. Handwritten letter from Susan Smith to John Doe, dated February 16, 2016, attached as **Exhibit L**.
 - M. Cease and desist demand letter from John Doe's attorney, Stacey Elin Rossi, to Susan Smith, dated March 13, 2016, attached as **Exhibit M**.
 - N. Birthday cards from John Doe to Susan Smith, dated January 21, 2015 and January 21, 2016, attached as **Exhibit N**.
 - O. Text message exchange between Andrea Estrada and Susan Smith, dated October 13, 2015, and email from Andrea Estrada to Dean Bolton, dated March 14, 2016, attached as **Exhibit O**.
 - P. Texts message exchange between Susan Smith and Lady Doe, dated Dec. 1 - 2, 2015, attached as **Exhibit P**.
 - Q. Lady Doe's Sprint Telephone Log, attached as **Exhibit Q**.
 - R. John Doe Statement Appeal hearing, attached as **Exhibit R**.

III. Applicable Policies

The parties have raised allegations about each other that span from the summer of 2014 through the spring of 2016. These Code of Conduct policies include: The Statement of Sexual Assault and Other Sexual Misconduct that was in effect during the summer of 2014 until October 2014, when the College updated that policy; the Statement of Sexual Assault and Other Sexual Misconduct that was in effect during the 2014 – 2015 academic year; the Stalking Policy, in effect during the 2014 – 2015 academic year; the 2015-2016 Code of Conduct, which includes the Stalking Policy,

the Relationship Abuse Policy, and the Retaliation policy; and, the Williams College Employee Handbook Sexual Misconduct Policy.

A. The 2013-2014 Student Code of Conduct

The College's 2013-2014 Student Code of Conduct applies to the allegations that precede the College's adoption of its Statement of Sexual Assault and Other Sexual Misconduct, which went into effect in October 2014.

B. The Statement of Sexual Assault and Other Sexual Misconduct, effective October 2014

Williams College is committed to maintaining a learning and working environment that is free from sexual assault, sexual harassment and other sexual misconduct, remedying the effects of such misconduct when it occurs, and preventing its re-occurrence. The term "sexual misconduct" includes sexual assault, sexual harassment, sexual exploitation, stalking, dating violence and domestic violence, all of which have more complete definitions below. The College also prohibits and has established procedures to address sexual discrimination that does not involve sexual misconduct. These issues are addressed in the College's Non-Discrimination Policy and Discrimination Grievance Procedures. Advice concerning the College's non-discrimination policies and procedures is available from any of the Advisors for Discrimination Concerns. This Statement describes the resources and options that are available to all members of the Williams community who have been subjected to sexual misconduct by another member of the community.

Consent is a crucial part of both the Williams Code of Conduct and Massachusetts law. The Williams College Code of Conduct requires affirmative consent for all sexual activity. Consent means that at the time of the sexual contact, words or conduct clearly indicate freely given approval or agreement, without coercion, by all participants in the sexual contact. Both parties have an obligation to communicate consent or the lack of consent. In the absence of affirmatively expressed consent, sexual activity is a violation of the code of conduct. In addition, a verbal "no" (no matter how indecisive) or resistance (no matter how passive) constitutes the lack of consent. In addition, consent once given may be withdrawn at any time. If consent is withdrawn, the other party must immediately stop whatever sexual contact is occurring. An individual is unable to give consent if he or she is substantially physically or mentally impaired by alcohol or drugs, forced or threatened, physically incapable of resisting, asleep, or unconscious. Consent while under the influence of alcohol or drugs is valid consent, unless the person is under the influence to the point of being substantially impaired. As is the case with other violations of the Code of Conduct, the use of alcohol or drugs does not minimize or excuse a person's responsibility for committing a sexual assault.

Dating or Domestic Violence means conduct by a person who is or has been in a relationship of a romantic or intimate nature with the victim, which involves physical harm to the victim; attempting or threatening to physically harm the victim; making the victim fear that physical harm is going to happen; or threatening, pressuring or forcing the victim to engage in sexual activity.

Non-Consensual Sexual Intercourse means any sexual penetration (anal, oral or vaginal), however slight, with any body part or object, by any person upon any other person, without effective consent.

Non-Consensual Sexual Contact means any sexual touching, however slight, with any body part or object, by any person upon any other person, without effective consent.

C. The Stalking Policy, effective during the 2014-2015 academic year

Stalking refers to a pattern of conduct directed at a specific person that would cause a reasonable person to feel fear, or to fear for the health or safety of a person they are close to, such as a friend or family member. Stalking behaviors can include, but are not limited to:

- non-consensual communication including in-person communication, telephone calls, voice messages, text messages, emails, social media site postings or messages, instant messages, posting of pictures or information on websites, written letters, gifts, or any other communications that are undesired or place another person in fear
- following, pursuing, waiting, or showing up uninvited at a workplace, place of residence, classroom, or other locations frequented by the victim
- surveillance or other types of observation, whether by physical proximity or electronic means
- trespassing, for example in a victim's dorm room
- vandalism
- non-consensual touching
- direct physical and/or verbal threats against a victim or a victim's loved ones
- gathering of information about a victim from family, friends, co-workers, and/or classmates
- manipulative or controlling behaviors such as threats to harm oneself, or threats to harm someone close to the victim
- defamation or slander against the victim, for example by spreading rumors

D. The 2015-2016 Code of Conduct includes the following policies:

The Stalking Policy is unchanged since the 2014-2015 academic year.

Relationship Abuse is defined as the use of physical force, coercion, threats, intimidation, isolation, or other forms of physical, or sexual abuse toward a partner in a current or former personal, intimate relationship. Relationship abuse also includes manipulation or other forms of emotional abuse if they have the effect of creating fear*, isolation, or restriction of access to resources, education or work. Relationship abuse includes behaviors that are defined as dating and/or domestic violence for purposes of remedies under Massachusetts law, Title IX, and for Clery Act reporting.

Relationship abuse is directed primarily against a person who is or has been involved in a sexual, dating, domestic or other emotionally, romantically, and/or physically intimate relationship with the respondent, although the abuse may be directed toward the family members, friends, pets, or property of the targeted partner.

Relationship abuse can encompass a broad range of behavior including, but not limited to, coercive, abusive, or violent behaviors that are physical, sexual and/or economic in nature. The also include psychological, verbal and/or emotional abuse if they have the effect of creating fear*, isolation, or restriction of access to resources, education or work. The behaviors generally form

an ongoing pattern of behavior, although one severe instance of physical or sexual abuse may be sufficient to establish relationship abuse.

Examples include, but are not limited to, situations in which the following behaviors are directed toward the targeted individual.

- Threats and intimidation: coercion and manipulation, including threats of self-harm, used to compel the targeted individual(s) to behave as directed; exhibiting extreme possessiveness or jealousy to control or compel the targeted partner(s) behavior; threatening to share information which could damage the target's reputation or relationships with others to compel the targeted partner's behavior; threatening to harm the target's family, friends, pets, or property; threatening the target with physical or sexual harm;
- Isolation and restriction of freedom: isolating or confining the target for a substantial period of time; repeatedly depriving the target of personal freedom of movement or access to friends, family, or support systems;
- Resource abuse: forcible or coercive denial of use or access to owned or shared assets, or limiting or controlling access to education or work; words and/or actions aimed at manipulating the financial or legal situation of the target;
- Harm to property or pets: attempting to cause or causing damage or injury to property owned or controlled by the target, or the target's pets; interfering with the target's access to property they own or control, or their pets;
- Physical abuse: attempting to cause or causing the target bodily injury or offensive physical contact;
- Sexual assault, sexual exploitation, and sexual harassment as defined elsewhere in the Code of Conduct;
- Stalking as defined elsewhere in the Code of Conduct

* In adjudication of cases, behavior that would cause a reasonable person to feel fear will be interpreted as constituting relationship abuse by this standard.

Retaliation Policy. Retaliation is harmful action taken against someone who has filed a complaint, provided testimony, or in some way participated in a disciplinary investigation or process. It could also include actions taken against someone who has intervened as a bystander to stop or attempt to stop harassment, discrimination, or misconduct.

It can include intimidating, threatening, coercing, or discriminating against an individual because of their participation in a disciplinary process, or because they opposed behavior that was in violation of our Code of Conduct.

If the actions directed at that individual would deter a reasonable person in the same circumstances from reporting misconduct, participating in a disciplinary process, or opposing behavior in violation of our Code of Conduct, it is deemed retaliatory.

E. The Williams College Employee Handbook Sexual Misconduct Policy, effective during the 2015-2016 academic year

The provisions of the Sexual Misconduct Policy, as provided for in the Williams College Employee Handbook, is the same as the Statement on Sexual Assault and Other Sexual Misconduct that was in effect on October 2014. Accordingly, all student conduct prohibited by the Statement on Sexual Assault and Other Sexual Misconduct is prohibited by the Sexual Misconduct Policy that is applicable to employees. Furthermore, the College's Sexual Misconduct Policies, as represented in the Williams College Code of Conduct, effective as of October 2015, are applicable to employees.

The Sexual Misconduct Investigation and Adjudication Process states in relevant part:

Cases involving a student and a faculty or staff member. A student who experiences conduct on the part of a staff or faculty member that the student believes violates the [College's Sexual Misconduct Policies](#) is encouraged to report that conduct to Campus Safety and Security, the College's Title IX Coordinator, or the Dean of the College. A student who reports an experience of sexual assault or other sexual misconduct is called the "complainant." The staff or faculty member who is accused of committing sexual assault or sexual misconduct is called the "respondent." Both the complainant and the respondent are encouraged to participate in the process of investigation and adjudication.

IV. Description of the Allegations

The parties were in a dating relationship between the Fall 2013 semester, when Susan was a junior and John was a sophomore, and the Spring 2016 semester. This section describes in chronological order the parties' allegations about each other. Note: Susan has raised allegations about John that predate the College's adoption of its Relationship Abuse policy. The Investigator has included Susan's allegations that his conduct violated that policy because the Relationship Abuse policy considers conduct that includes "an ongoing pattern of behavior."

A. [REDACTED] summer of 2014 [REDACTED]

Susan's First Interview

John and Susan both lived in New York City during the summer of 2014; he with his family on Long Island and she near Columbia University, where she was enrolled in a public health program.

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED] violation of the College's Relationship Abuse policy.

B. [REDACTED] summer 2014 program at Columbia University

Susan's First Interview

[REDACTED]

John's Second Interview

[REDACTED]

Susan's Second Interview

[REDACTED]

Alleged Policy Violation

[REDACTED] thereby violating the [REDACTED] provision of the Relationship Abuse policy.

C. Susan's allegation of non-consensual sex in September 2014

Susan's First and Second interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Susan believes that sometime in October, she told her friend, Andrea Estrada, about this situation while they were sitting on a bench by the squash courts. She told Andrea that she felt really uncomfortable when she and John had been having sex because “it was a really different position,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

²The College contacted Matias Crespo and Giselle Trivino, but they both they both declined to participate in this investigation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

John's Third Interview

[REDACTED]

Susan's Third Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- During sexual intercourse, Susan did not express to John that she did not want to be having sex. Since that incident, she never communicated to him that she regarded their

³ [REDACTED]

sexual activity on that night as non-consensual [REDACTED]

Information from Witnesses

Andrea Estrada, class of 2016, met both Susan and John in the fall of her sophomore year. She met Susan when she joined a dance group called Kusika, and met John when she joined a dance group called Ritmo Latino. Andrea became close with Susan. She only interacted with John at Ritmo gatherings. Andrea does not recall Susan confiding in her about any episode of sexual contact with John that Susan described as either non-consensual or upsetting.

Ava Atri, a rising senior at the College, met Susan when she joined Kusika in the fall of 2014. Ava does not know John but has seen him around campus and at parties.

Sometime last year (Ava doesn't recall when), she and Susan were having a conversation about John's verbal abuse of her. Ava asked Susan whether John had ever abused her physically or engaged in non-consensual sex with her. Susan replied, "No, he's never done that. He doesn't do that." However, in May 2016, while Susan and Ava were spending time in Susan's apartment, she told Ava that the night that she and John moved in together in August 2014, they had intercourse even though she was "really tired and not in the mood," and "didn't want to" have sex. At the time Susan didn't think it was a big deal and did not consider it non-consensual. Later, she realized that it was a non-consensual sexual activity. Susan did not provide Ava with any more details about this incident, and Ava does not know when Susan began to regard that sexual encounter as non-consensual.

[REDACTED]

[REDACTED]

Susan told **Elanie Wilson** about this incident in June and July 2016. Elanie had heard about the incident from another friend, who she did not name, and approached Susan during a picnic for alumni of color held in New York City on June 18, 2016. She briefly offered her support, and Susan requested they talk about it [REDACTED]

[REDACTED]

[REDACTED]

⁴"TMI" means "too much information."

[REDACTED]

Alleged Policy Violation

[REDACTED]

D. [REDACTED] October 2014

Susan's First Interview

[REDACTED]

[REDACTED]

[REDACTED]

John's Second Interview

[REDACTED]

5 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

Susan's Third Interview

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED] a violation of the Relationship Abuse policy.

E. [REDACTED] **January 23, 2015**

Susan's First Interview

[REDACTED]

[REDACTED]

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

John's Third Interview

[Redacted]

[Redacted]

Susan's Third Interview

[Redacted]

[Redacted]

Information from Witnesses

[Redacted]

[Redacted]

[Redacted]

Alleged policy violation(s)

[Redacted]

Relationship Abuse policy. a violation of the



F. John's allegation that Susan accessed his Facebook and Snapchat accounts without his permission in January 2015 and January 2016.

John's First Interview

John's sister, Lady Doe, told him that Susan had confided in her that she had "hacked" his Facebook account to keep track of who his communications with other women. Susan implied to Lady that she frequently accessed his Facebook account without permission. Lady told John about this during a December 6, 2015 phone conversation. See Section IV(M).

In January 2016, John received a notification that his Snapchat account had been accessed from Bolivar, Colombia, where Susan was spending the holidays with her family.

John denies that he gave Susan permission to access any of his social media accounts. He believes that she was able to access them because she knew his Netflix password, which he also used for Facebook and Snapchat.

Susan's Second Interview

Susan denies that she attempted to access John's Snapchat account when she was visiting family in Colombia over the 2015/2016 winter break. Susan stated that she did not have access to John's login credentials, and that although he had entered his Netflix password into her computer and TV, she didn't know what the password was.

Susan denies that she admitted to John's sister, Lady, that she had hacked his Facebook account to monitor his communications. She stated that on one occasion in 2014, John left his Facebook open, and she discovered that he was communicating with other women. When Susan told Lady about this, Lady became angry at John for talking to other girls while he was in a relationship with Susan.

John's Third Interview

Prior to John's third interview, he provided the Investigator with a January 22, 2015 screenshot of a text exchange that Susan had had with his sister, Lady Doe. In that communication, Susan shared with Lady a screenshot of a Facebook conversation that John had had with another woman on January 19, 2015. **Exhibit C**. John learned of this incident from Lady a few weeks after it occurred. He surmises that this was only one of many instances in which Susan accessed his social media without permission.

John does not believe that Susan was able to access his Facebook account because he left it open. He stated the he usually accessed Facebook through his phone, which locks as soon as the screen turns off. He rarely accessed Facebook through his computer, and when he did, the screen locked two minutes after the computer was idle.

Susan's Third Interview

Susan acknowledged that her Facebook exchange with Lady could have occurred January 2015. She found John's Facebook messages with another woman when she accessed his account on his computer, and sent screenshots of their chat to Lady Doe. **Exhibit C**. She had the password to John's his computer because she regularly used it to print because it was the only computer

connected to the printer. Susan reasserted that she did not have John's Facebook password. She was able to access his Facebook account because he had not signed out of it.

Information from Witnesses

Susan told **Jackie Lee** that she had accessed John's Facebook account and discovered that he had been communicating with another woman. Jackie does not remember whether Susan told her how she was able to access John's Facebook account.

Lady Doe, John's older sister, had a close relationship with Susan while the parties were dating. Lady recalls two occasions on which Susan admitted to her that she had "hack[ed] into his [social media] accounts." Following these admissions, Susan complained to Lady that John was communicating with other women. The first occasion, according to Facebook messages she exchanged with Susan, was in January 2015. **Exhibit C**. The second time was in December 2015 or January 2016, when Susan was visiting her family in Colombia. Lady dropped her off at the airport in New York, and thought everything between Susan and John was fine. However, while Susan was in Colombia, Lady learned that the parties had had another argument over the phone relating to her invasion of his privacy.

Alleged Policy Violation

John alleges that Susan violated his privacy by accessing his social media accounts without permission. John believes that this incident amounts to a violation of the Stalking policy, which prohibits "surveillance and other type of observation," and was in effect during both the 2014-2015 and 2015-2016 academic years. Moreover, John alleges that Susan's conduct demonstrated her extreme jealousy and amounted to a violation of the Relationship Abuse policy.

G. [REDACTED] February 2015

Susan's First Interview

[REDACTED]

John's Second Interview

[REDACTED]

Susan's Second Interview

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

Alleged policy violation

[REDACTED] violated a provision of the Relationship Abuse policy [REDACTED]

[REDACTED] the provision of the Relationship Abuse policy [REDACTED].

**H. [REDACTED] (on the same day as [REDACTED])
in February 2015**

Susan's First Interview

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED] violated the Relationship Abuse policy.

- I. [REDACTED] in March 2015

Susan's First Interview

[REDACTED]

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED] violated the Relationship Abuse policy [REDACTED]

J. [REDACTED] August and September 2015

[REDACTED]

Susan's First Interview

[REDACTED]

John's Second Interview

[REDACTED]

Susan's Second Interview

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED] violated
the Relationship Abuse policy [REDACTED]

[REDACTED]

Susan's First Interview

[REDACTED]

John's Second Interview

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

John's Third Interview

[REDACTED]

Susan's Third Interview

[REDACTED]

[REDACTED]

Information from Witnesses

[REDACTED]

Alleged Policy Violation

[REDACTED] violated the Relationship Abuse policy [REDACTED]

K. [REDACTED] **November 2015**

Susan's First Interview

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED]

[REDACTED]

Susan's First Interview

[REDACTED]

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 [REDACTED]

[REDACTED]

Alleged Policy Violation

[REDACTED]

M. John's allegation that Susan slapped him on December 5, 2015

John's First Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Susan slapped John's left cheek, with some force

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Susan's First Interview

[REDACTED]

[REDACTED]

him, [REDACTED] I slapped

[REDACTED]

[REDACTED]

John's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Susan slapped his face. [REDACTED]

[REDACTED]

Susan's Second Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

John's perspective—third interview

[REDACTED]

Information from Witnesses

[REDACTED]

[REDACTED]

On December 6, 2015 at 12:35 a.m., John's sister, **Lady Doe**, received a call from a hysterical Susan

[REDACTED]

on the face.

Susan slapped him

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Alleged Policy Violations

John believes that Susan violated the Relationship Abuse policy when she slapped his face during a verbal disagreement.

[REDACTED]

[REDACTED]

N. Valentine's Day 2016

John's First Interview

[REDACTED]

Susan's Second Interview

[REDACTED]

Alleged Policy Violation

[REDACTED]

O. [REDACTED]

John's First Interview

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹¹ The Investigator understands that the College has addressed these allegations, and that this matter has been resolved.

At the hearing, Susan testified

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] testified in person, [REDACTED]

John's Second Interview

[Redacted]

[Redacted]

Susan's Second Interview

[Redacted]

[Redacted]

[Redacted]

John's Third Interview

[Redacted]

[Redacted]

Information from Witnesses

[REDACTED]

[REDACTED]

Alleged policy violations

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

V. Summary of the Parties' Alleged Policy Violations

The hearing panel may consider the following allegations that the parties have raised about each other to determine whether it is more likely than not that Susan and/or John have violated one or more of the policies described herein:

A. John's allegations about Susan

Over the course of their relationship, did Susan Smith's conduct, either discretely or collectively, amount to a violation of the 2015-2016 **Williams College Employee Handbook Sexual Misconduct Policy**, which incorporates the **Code of Conduct's Relationship Abuse policy**, based on the allegations that John raised regarding:

- Susan's surveillance of his social media accounts in January 2015 and January 2016;
- The physical altercation that occurred on December 5, 2015; [technically, this may have occurred just after midnight December 6, 2015, added by Plaintiff]

[REDACTED]

VI. Conclusion

In conclusion, the Investigator had reviewed and considered the statements of the parties, and the witnesses referenced herein, as well as the exhibits attached hereto, and has identified the incidents and events that the parties believe amount to violations of various of the College's policies.