

6. At least one, if not more, employee at the Office of Campus Safety and Security is known to date and have sex with female students and even brag about the exploits. Because this employee is part of the "old boy network", the behavior is accepted.
7. ~~Immediately~~<sup>A</sup> after John Doe's attorney filed its ~~Second~~<sup>First or Original JMC</sup> Amended Complaint, the College issued a Non-Disclosure Agreement to all employees acknowledging the law protecting whistleblowers and forbidding disclosures to the media.

Signed under the pains and penalties of perjury this 16 day of March 2017.

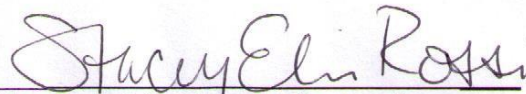
  
\_\_\_\_\_  
JOSHUA COSTA

COMMONWEALTH OF MASSACHUSETTS

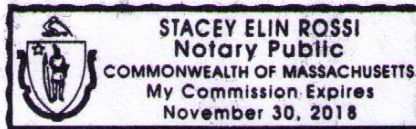
BERKSHIRE, ss.

On this 16<sup>th</sup> day of March 2017 before me, the undersigned notary public, personally appeared JOSHUA COSTA, personally known to me or satisfactorily proven to be the person whose name is signed above, acknowledged to me that he signed the foregoing instrument voluntarily for its stated purpose.

Executed in Williamstown, Massachusetts.

  
\_\_\_\_\_  
Notary Public: Stacey Elin Rossi

My Commission Expires November 30, 2018



**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_ )  
JOHN DOE, )  
 )  
Plaintiff )  
 )  
v. )  
 )  
WILLIAMS COLLEGE, )  
 )  
Defendant. )  
\_\_\_\_\_ )

CIVIL ACTION NO.: 3:16cv-30184-MAP

**AFFIDAVIT OF JOSHUA COSTA IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PRELIMINARY JUDGMENT**

JOSHUA COSTA deposes and states the following:

- 1. I am employed by Williams College. I was hired in August 2015 by the Williams College Office of Campus Safety and Security as a Campus Safety Officer. In August 2016, I was promoted to the position of Patrol Supervisor at the Williams College Office of Campus Safety and Security.
- 2. I am familiar with the Second Amended Complaint in the above-captioned case.
- 3. John Doe's case exemplifies how there is no uniformity to the College's application of its policies and procedures when examined in contrast to other cases of sexual misconduct at the College involving students with students and students with employees.
- 4. On or around December 15, 2016, I was a first responder to a call involving a student who had sexually assaulted another student and during the incident had smashed the student's head enough to cause it to bleed. The parents of the assaultive student are well connected to the Goodrich family, which has such a prominent role at Williams College that Goodrich Hall is named after it. The assaultive student experienced no disciplinary consequences for his actions.
- 5. Several students have multiple no contact orders on them with as many as 4 female students who have reported them for sexual assault. In fact, one of such students is nicknamed Date Rape.