

U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

U.S. Department of Education  
Office for Civil Rights  
400 Maryland Avenue, SW  
Washington, D.C. 20202-1100

HONORABLE ASSISTANT ATTORNEY GENERAL FOR  
CIVIL RIGHTS AND HONORABLE ASSISTANT  
SECRETARY FOR CIVIL RIGHTS,

PLEASE NOTE THAT WE HEREBY FILE THIS FEDERAL  
CIVIL RIGHTS COMPLAINT (TITLE IX) AGAINST  
CORNELL UNIVERSITY. WE SUBMIT THIS COMPLAINT  
UNTO THE JOINT JURISDICTION OF THE DEPARTMENT  
OF JUSTICE AND THE DEPARTMENT OF EDUCATION.

YOURS TRULY,  
COALITION MEMBERS

CC: Assistant Attorney General for Civil Rights, Eric Dreiband  
CC: Assistant Secretary of Civil Rights, Kenneth Marcus  
CC: Department of Justice (Education) Electronic Submission Portal  
CC: Office for Civil Rights Electronic Submission Portal

## PROLOGUE

**GENERAL.** Men are, on average, more disadvantageded than women throughout the world – including the United States.<sup>1</sup> The American criminal justice system is biased against male defendants.<sup>2</sup> Likewise, there are concerns about discrimination against men in the American family court system.<sup>3</sup>

**NO WAGE GAP.** The persistent myth that men earn more than women for the same work is fueled by flawed comparisons which “do not control for many factors that can be significant in explaining earnings differences.”<sup>4</sup> Men “are significantly more likely ... to work longer hours.” In addition, a woman’s decision to take time off for marriage and childbearing is another factor that may result in a lower salary.<sup>5</sup> This was demonstrated in a 2005 study by the Congressional Budget Office which found “no gender gap in wages among men and women with similar family roles.”<sup>6</sup> Furthermore, it is axiomatic that men work in more dangerous jobs and thus are more likely to suffer grievous harm: “riskier jobs get paid more.”<sup>7</sup> Women control 60% of personal wealth and buy 85% of all customer purchases: moreover, 40% of women earn more than their husbands.”<sup>8</sup> In 2010, *Time* reported that “single women under 30 actually earned, on average, 8% more than their male counterparts.”<sup>9</sup> A recent study found out that women are 36% more likely than men to receive a job offer.<sup>10</sup>

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<sup>1</sup> <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0205349>

<sup>2</sup> [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2144002](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2144002)

<sup>3</sup> <https://ir.library.illinoisstate.edu/cgi/viewcontent.cgi?article=1631&context=etd>

<sup>4</sup> U.S. Bureau of Labor Statistics, *Highlights of women’s earnings in 2013*, December 2014, <https://www.bls.gov/opub/reports/womens-earnings/archive/highlights-of-womens-earnings-in-2013.pdf>.

<sup>5</sup> Ketterer, Sarah, “The ‘Wage Gap’ Myth That Won’t Die,” *Wall Street Journal*, September 30, 2015, <https://www.wsj.com/articles/the-wage-gap-myth-that-wont-die-1443654408>.

<sup>6</sup> O’Neill and O’Neill, *What Do Wage Differentials Tell us About Labor Market Discrimination?*, National Bureau of Economic Research, March 2005, p. 33, [https://www.nber.org/papers/w11240.pdf?new\\_window=1&mod=article\\_inline](https://www.nber.org/papers/w11240.pdf?new_window=1&mod=article_inline)

<sup>7</sup> Worstall, Tim, “Here’s Your Gender Pay Gap - Fatal Occupational Injuries,” December 21, 2016, *Forbes*, <https://www.forbes.com/sites/timworstall/2016/12/21/heres-your-gender-pay-gap-fatal-occupational-injuries/#750063c26c3e>.

<sup>8</sup> “Statistics on the Purchasing Power of Marketing,” *girlpowermarketing*, (emphasis in original) <https://girlpowermarketing.com/statistics-purchasing-power-women/>.

<sup>9</sup> Williams and Ceci, *supra*, , quoting, O’Neill and O’Neill, *What Do Wage Differentials Tell us About Labor Market Discrimination?*, National Bureau of Economic Research, March 2005, p. 33, [https://www.nber.org/papers/w11240.pdf?new\\_window=1&mod=article\\_inline](https://www.nber.org/papers/w11240.pdf?new_window=1&mod=article_inline); citing, Luscombe, “Workplace Salaries: At Last, Women on Top,” *Time*, September 1, 2010, [http://content.time.com/time/business/article/0,8599,2015274,00.html?mod=article\\_inline](http://content.time.com/time/business/article/0,8599,2015274,00.html?mod=article_inline).

<sup>10</sup> <http://insight.movemeon.com/insight-analysis/gender/women-more-likely-to-get-hired-than-men>

**EDUCATION.** The education system in America is especially biased against men. 77% of all teachers in the public education system are women.<sup>11</sup> Girls have higher grades than boys in all categories.<sup>12</sup> Numerous studies “have shown that stereotyping [by female teachers] can bias teachers’ assessment and grades” against boys.<sup>13</sup> Women are the overrepresented sex among college students nationwide.<sup>14</sup> They are also the majority of law students<sup>15</sup> and medical students.<sup>16</sup> Almost every college offers a Women’s Studies Department,<sup>17</sup> but no equivalent programs exist for men.<sup>18</sup> Women are the majority of students at Cornell University [52%] and they are also the majority of academic employees at Cornell [52.1%].<sup>19</sup>

**SCIENCE, TECHNOLOGY, ENGINEERING, MATH.** Women comprise the majority of doctorate degrees in the health and medical (80%), biological (56%) and social/behavioral (63%) sciences nationally.<sup>20</sup> 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.<sup>21</sup> Women are at a 2 to 1 advantage over men in STEM faculty hiring.<sup>22</sup> Despite women outpacing men, affirmative action programs continue to be justified on the grounds of implicit gender bias. However, empirical evidence for systemic

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<sup>11</sup><https://www.edweek.org/ew/articles/2017/08/15/the-nations-teaching-force-is-still-mostly.html>

<sup>12</sup><http://www.apa.org/news/press/releases/2014/04/girls-grades.aspx>

<sup>13</sup> Camille Terrier, *Boys Lag Behind: How Teachers’ Gender Biases Affect Student Achievement*, November 2016, MIT Department of Economics and National Bureau of Economic Research, (“Research shows that teachers’ biases generate self-fulfilling prophecies, produce stereotype threats, affect students’ interest in a subject, and affect students’ levels of effort.” pp. 1-3 (citations omitted)  
<https://seii.mit.edu/wp-content/uploads/2016/11/SEII-Discussion-Paper-2016.07-Terrier-1.pdf>.

<sup>14</sup>[https://nces.ed.gov/programs/digest/d16/tables/dt16\\_322.20.asp](https://nces.ed.gov/programs/digest/d16/tables/dt16_322.20.asp)

<sup>15</sup><https://www.nytimes.com/2016/12/16/business/dealbook/women-majority-of-us-law-students-first-time.html>

<sup>16</sup>[https://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](https://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)

<sup>17</sup> <https://datausa.io/profile/cip/050207/>

<sup>18</sup> The creation of a Men’s Studies program is not a hypothetical request. There are scholars who would like to teach such subjects (Edward Stephens, Warren Farrell) and there is also demand for such programs. For example, a Facebook page called “Gender Studies for Men” has 5000+ likes on Facebook, a not-so-insignificant number since most Women’s Studies programs have small cohorts:

<https://www.facebook.com/GenderStudiesForMen/>

<sup>19</sup> <https://www.collegefactual.com/colleges/cornell-university/student-life/diversity/>

<sup>20</sup> <http://www.aei.org/publication/women-earned-majority-of-doctoral-degrees-in-2017-for-9th-straight-year-and-outnumber-men-in-grad-school-137-to-100-2/>

<sup>21</sup><https://www.ed.gov/news/press-releases/us-department-education-releases-2015-16-civil-rights-data-collection>

<sup>22</sup> Williams, W. M. & Ceci, S. J. National hiring experiments reveal 2:1 faculty preference for women on STEM tenure track. *Proc. Natl. Acad. Sci. U.S.A.* p. 112, 5360–5365 (2015).

anti-female gender bias in science is tenuous. In fact, men may be held to a higher standard than women in order to warrant praise.<sup>23</sup>

**BIAS IN SEXUAL HARASSMENT ADJUDICATION.** According to institutions that release such data, the overwhelming majority of all persons sanctioned under Title IX theory are male.<sup>24</sup> However, men and women experience sexual victimization at equal rates<sup>25</sup> and the majority of male victims report female perpetrators.<sup>26</sup> The majority of Title IX administrators nationwide are women.<sup>27</sup> The unfairness of Title IX tribunals has received widespread and bipartisan criticism.<sup>28,29,30,31,32,33</sup> Cornell University in particular has been called out repeatedly due to its persistent bias against men.<sup>34,35,36,37</sup>

**CHILLING EFFECT.** Male students/professors who deviate from the orthodoxy of campus gender politics often face mobbing or termination. There are many such examples, including cases covered by the press.<sup>38,39,40,41,42</sup>

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<sup>23</sup> Gender Bias in Science or Biased Claims of Gender Bias? *Psychology Today*. Available at: <https://www.psychologytoday.com/blog/rabble-rouser/201707/gender-bias-in-science-or-biased-claims-gender-bias> (Accessed: 5th November 2018).

<sup>24</sup> *Stanford University's 2018 Title IX Report*:  
<https://news.stanford.edu/2018/02/27/provost-issues-campus-wide-report-title-ix-sexual-harassment-cases/>

*Yale University's 2018 Title IX Report*:

[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)

<sup>25</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4062022/>

<sup>26</sup> <https://www.sciencedirect.com/science/article/pii/S1359178916301446?via%3Dihub>

<sup>27</sup> [https://www.nas.org/articles/gender\\_inequity\\_among\\_the\\_gender\\_equity\\_enforcers](https://www.nas.org/articles/gender_inequity_among_the_gender_equity_enforcers)

<sup>28</sup> <https://dash.harvard.edu/handle/1/33789434>

<sup>29</sup> <https://reason.com/blog/2018/02/19/ruth-bader-ginsburg-due-process-me-too>

<sup>30</sup> <https://www.wsj.com/articles/jerry-browns-title-ix-veto-1508280834>

<sup>31</sup> <http://www.saveservices.org/wp-content/uploads/Victim-Centered-Practices-Open-Letter-FINAL.docx.pdf>

<sup>32</sup> <https://www.washingtontimes.com/news/2016/may/18/law-professors-letter-denounces-title-ix-overreach/>

<sup>33</sup> [https://www.nas.org/articles/nas\\_applauds\\_secretary\\_devos\\_decision\\_on\\_title\\_ix](https://www.nas.org/articles/nas_applauds_secretary_devos_decision_on_title_ix)

<sup>34</sup> <https://reason.com/archives/2018/04/12/23-cornell-professors-say-their-school-v>

<sup>35</sup> <https://cornellsun.com/2017/04/14/student-who-says-he-attempted-suicide-during-title-ix-investigation-sues-cornell/>

<sup>36</sup> <https://thetab.com/us/cornell/2017/01/20/cornells-title-ix-investigator-investigation-gender-bias-4563>

<sup>37</sup> <https://www.thecollegefix.com/cornell-denies-student-his-ph-d-and-may-expel-him-for-allegedly-defending-professor-against-rape-claim/>

<sup>38</sup> <http://www.foxnews.com/us/2018/03/12/college-student-kicked-out-class-for-telling-professor-there-are-only-two-genders.html>

<sup>39</sup> <https://www.andrewlawton.ca/pro-free-speech-professor-rick-mehta-fired-by-acadia-university/>

<sup>40</sup> <https://thehill.com/blogs/blog-briefing-room/news/409090-catholic-university-suspends-dean-over-comment-that-degraded>

<sup>41</sup> <https://pjmedia.com/trending/students-demand-professor-fired-after-he-champions-due-process-says-accusers-sometimes-lie/>

<sup>42</sup> <https://www.washingtontimes.com/news/2019/jan/7/peter-boghossian-portland-state-univ-professor-fac/>

## JURISDICTION

We hereby submit this complaint unto the joint jurisdiction of the Department of Education and the Department of Justice. There is language in the Case Processing Manual [DOE: OCR] which supports such joint jurisdiction and there is also precise precedent for co-prosecution.<sup>43</sup>

## LEGAL THEORY

The Supreme Court prohibits gender discrimination against men. In *Craig v. Boren*, the Supreme Court criticized the use of sex in a statute that prohibited vendors from denying only to males the option to purchase a higher alcohol content beer.<sup>44</sup> The Court found the statute's reliance on "broad sociological propositions by statistics ... a dubious business, and one that inevitably is in tension with the normative philosophy that underlies the Equal Protection Clause."<sup>45</sup> Original and appellate courts have proscribed sex discrimination against men as well as women,<sup>46</sup> and decisions have been based on different laws and statutes including Title IX, Title VI, Title VII and the Fourteenth and Fifth Amendments.<sup>47</sup>

The Supreme Court has consistently rejected "overbroad generalizations about the different talents, capacities or preferences of males and females" as a basis for sex classifications in other state and federal laws.<sup>48</sup> In *Mississippi Univ. for*

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<sup>43</sup> <https://www2.ed.gov/documents/press-releases/montana-missoula-letter.pdf>

<sup>44</sup> *Craig v. Boren*, at p. 204.

<sup>45</sup> *Ibid.* at p. 210. "We conclude that the gender-based differential contained in Okla. Stat., Tit. 37, § 245 (1976 Supp.) constitutes a denial of the equal protection of the laws ... and reverse the judgment of the District Court." The Court allowed the vendor to "rely upon the equal protection objections of males 18-20 years of age to establish her claim of unconstitutionality of the age-sex differential." *Id.* at pp. 192-93.

<sup>46</sup> *Craig v. Boren*, 429 US 190, 202, 204 (1976) ("Indeed, prior cases have consistently rejected the use of sex as a decision-making factor even though the statutes in question certainly rested on far more predictive empirical relationships than this."); *Sessions v. Morales-Santana*, 137 S. Ct. 1678, 582 US \_\_\_, 198 L. Ed. 2d 150 (2017) (invalidating a law that treated men less favorably than women in determining citizenship); *Orr v. Orr*, 440 U.S. 268 (1979) (invalidating Alabama statute that imposed alimony obligations on husbands, but not wives); *Caban v. Mohammed*, 441 U.S. 380 (1979) (invalidating New York statute that required the consent of the mother, but not the father, to permit the adoption of an illegitimate child).

<sup>47</sup> In *Glenn v. Brumby*, 663 F. 3d 1312 (11th Cir. 2011) the Eleventh Circuit drew upon U.S. Supreme Court cases interpreting Title VII to reach its conclusion in favor of the plaintiff, even though the plaintiff chose to pursue only a remedy for the Fourteenth Amendment violation.

<sup>48</sup> *United States v. Virginia*, 518 U.S. 515, 533 (1996) (denying women admission to a state military institute); see also, *Sessions v. Morales-Santana*, 137 S. Ct. 1678, 582 US \_\_ (2017) (invalidating law that effectively treated men less favorably than women in acquiring U.S. citizenship); *Weinberger v.*

*Women v. Hogan (Hogan)*,<sup>49</sup> the Supreme Court held that denying men enrolment in a nursing program was impermissible gender classification under the Equal Protection Clause of the Fourteenth Amendment.<sup>50</sup> Though the issue concerned an equal protection challenge,<sup>51</sup> the decision is helpful in evaluating whether Cornell's sex restriction for certain benefits is reasonable. In *Hogan*, the Supreme Court reasoned that a sex classification must be

...determined through reasoned analysis rather than through the mechanical application of traditional, often inaccurate, assumptions about the proper roles of men and women. Care must be taken in ascertaining whether the statutory objective itself reflects archaic and stereotypic notions. Thus, *if the statutory objective is to exclude or "protect" members of one gender because they are presumed to suffer from an inherent handicap or to be innately inferior, the objective itself is illegitimate* [italics added]<sup>52</sup>

*Mississippi Univ. for Women v. Hogan*, 458 U.S. 7, 18, 724 (1982)

Circuit courts agree with this normative philosophy and expanded upon the use of Title IX to eliminate discrimination against men. 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.<sup>53</sup> 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.<sup>54</sup>

The plain language of Title IX, predicated in 34 CFR §106, prohibits any institution from funding/sponsoring discriminatory scholarships, programs,

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*Wiesenfeld*, 420 U. S. 636, 640-41, 653 (1975) (invalidating federal law that denied benefits to male single parents, but allowed benefits for females).

<sup>49</sup> *Mississippi Univ. for Women v. Hogan*, 458 U.S. 7, 18, 724 (1982)

<sup>50</sup> *Ibid.*, at pp. 720-21, quoting *Wengler v. Druggists Mutual Ins. Co.*, 446 U. S. 142, 150 (1980).

<sup>51</sup> *Ibid.*, at p. 730. Under the Equal Protection Clause, the discriminating entity must be a government or state actor and must show the gender classification serves "important governmental objectives and that the discriminatory means employed" are "substantially related to the achievement of those objectives." *Ibid.* at p. 724. Claims may be brought under both Title IX and for violations of equal protection under 42 USC § 1983. *Fitzgerald v. Barnstable School Committee*, 555 U.S. 246, 129 S.Ct. 788, 790 (2009)

<sup>52</sup> *Ibid.*, at pp. 724-725.

<sup>53</sup> "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*, No. 15-1536, 2<sup>nd</sup> Circuit 2016, p. 26, footnote 11).

<sup>54</sup> "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*, No. 17-3396, 6<sup>th</sup> Circuit 2018, p. 15).

fellowships and initiatives.<sup>55</sup> Title IX prohibits recipients from listing, soliciting, approving, sponsoring discriminatory scholarships even if they are entirely external to the University.<sup>56</sup> Even *listing* discriminatory scholarships is in express violation of Title IX: nothing in the language of 34 CFR §106 suggests that an institution is allowed to *mention* a discriminatory scholarship or program on its webpages.<sup>57</sup> Title IX prohibits discrimination in terms of counselling.<sup>58</sup> Title IX prohibits discrimination in terms of health benefits.<sup>59</sup> Title IX prohibits any kind of *preference* for admission in any educational entity, or its constituent chapters.<sup>60</sup> In determining whether discrimination occurs, Title IX requires an assessment of the *overall effect*.<sup>61</sup> Fraternities and sororities are exempt from Title IX, but professional clubs are not.<sup>62</sup>

There are even narrower Title IX precedents for this complaint. For example, Michigan State University converted a women-only study space in the Michigan Union to a gender-neutral lounge, following a Title IX complaint.<sup>63</sup> Texas A&M University was subject to a Title IX complaint because it eliminated its last male-only dorm while preserving multiple female-only dorms.<sup>64</sup> The press has reported that the Department of Education is investigating Yale University,<sup>65</sup> the University of Southern California,<sup>66</sup> and Tulane University<sup>67</sup> for similar Title IX violations. The Oregon Department of Education compelled South Eugene High School to replace the title “Axemen” with “Axe” in order to promote inclusivity.<sup>68</sup> In a previous Title IX precedent, the University of Southern California agreed to change the name of the “Center

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<sup>55</sup> Such is the overall intent of CFR § 106.

<sup>56</sup> CFR § 106.37.

<sup>57</sup> 34 CFR §106.37(a)(2) expressly prohibits even *listing* any outside organization’s offerings to its “students in a manner which discriminates on the basis of sex. In reading 106.31(b)(6) and 106.37(a)(2) together, “significant assistance” would thus include the mere listing of a sex-discriminatory offering.

<sup>58</sup> CFR § 106.36.

<sup>59</sup> CFR § 106.39.

<sup>60</sup> CFR § 106.22.

<sup>61</sup> CFR § 106.37.

<sup>62</sup> As per an internal memorandum from 1989, which makes a distinction between *social* and *professional* clubs:

<https://www2.ed.gov/about/offices/list/ocr/docs/memo-re-fraternities-and-sororities.pdf>

In a more general sense, there is a balancing effect between the fraternities and sororities of Cornell University, even if both fraternities and sororities are sex-exclusive. Cornell offers a plethora of *professional* clubs for the female majority, with no equivalent programs for the male minority. As such, the overall effect is discriminatory against men.

<sup>63</sup> [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](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)

<sup>64</sup> <https://www.thecollegefix.com/post/31646/>

<sup>65</sup> <https://www.campusreform.org/?ID=10899>

<sup>66</sup> <https://www.campusreform.org/?ID=10931>

<sup>67</sup> <https://www.breitbart.com/tech/2018/09/13/tulane-facing-education-department-investigation-for-female-only-scholarships/>

<sup>68</sup> [http://www.oregonlive.com/education/index.ssf/2018/02/eugene\\_officials\\_chop\\_south\\_eu.html](http://www.oregonlive.com/education/index.ssf/2018/02/eugene_officials_chop_south_eu.html)

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.<sup>69</sup> In a different precedent, Stanford University agreed that female-only gym training hours constitute a violation of Title IX and offered to create male-only gym training hours to create a sense of balance.<sup>70</sup> Tulane University is moving towards transforming a female-only institute and opening its programs to both sexes.<sup>71</sup> Also worth mentioning is Minnesota State University’s decision to open three female-only scholarships to both sexes.<sup>72</sup>

Nowhere in this complaint do we infer discrimination based on disproportionate enrolment alone.<sup>73</sup> The fact that these scholarships and programs are endorsed as “women only” is sufficient, in and of itself, to infer disparate treatment. Such endorsement has a clearly dissuasive effect on males. This effect is akin to a German campus rejecting Jewish applicants in excess of the maximum quota<sup>74</sup> or state-sanctioned hate speech against non-Muslims in Saudi Arabia<sup>75</sup> or indeed, the “separate but equal” doctrine struck down in *Brown v. the Board of Education*. These exclusionary practices create a hostile environment against prospective male applicants. As per United States 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).<sup>76</sup> This includes situations in which “students are harassed for exhibiting what is perceived as a stereotypical characteristic for their sex” (*ibid*). For example, men who stereotyped and vilified on account of their masculinity are protected by Title IX.

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<sup>69</sup> In 2014, only 71 male students used the *Center for Women and Men* throughout the academic year. By 2016, this number had increased to 1943 male students (Title IX Complaint Against the University of Southern California, Docket #09-16-2128, p. 21).

<sup>70</sup> “The University informed OCR that it has modified the weightlifting program. It has now instituted both “men-focused” and “women-focused” weightlifting hours, which are open to all students regardless of gender. Both weightlifting sessions are open for the same amount of time two times a week” (Title IX Complaint Against Stanford University, Docket #09-18-2175, p. 1).

<sup>71</sup> “The decision to expand programming had unanimous support of the Newcomb Foundation Board and the Tulane Board of Administrators.” <https://tulanehullabaloo.com/44537/news/complaint-filed-against-nci-for-discrimination-against-men/#comment-809>

<sup>72</sup> <http://www.wctrib.com/news/education/4523708-rules-women-only-grants-changed-after-mans-discrimination-charge-university>

<sup>73</sup> 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.

<sup>74</sup> *The Law against Overcrowding in Schools and Universities*:  
[https://link.springer.com/chapter/10.1007%2F978-3-0348-9008-3\\_12](https://link.springer.com/chapter/10.1007%2F978-3-0348-9008-3_12)

<sup>75</sup> <https://www.aljazeera.com/news/2017/09/hrw-saudi-arabia-hate-speech-target-minorities-170926082722213.html>

<sup>76</sup> <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20100420.pdf>

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. DOJ/DOE must not inquire whether any futile applications have been made to these exclusionary programs before issuing injunctive relief against them.

Supreme Court doctrine is unambiguous on this question: in the presence of clearly discriminatory practices, the victims of discrimination are not the small 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, the United States cannot limit itself to offering redress to men who specifically apply to programs and offerings which refer to themselves as “Women Only” (or which maintain all-female compositions 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)<sup>77</sup>

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.<sup>78</sup> 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 single widower was granted standing to challenge (and strike down) an openly discriminatory policy:

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<sup>77</sup> <https://supreme.justia.com/cases/federal/us/431/324/>

<sup>78</sup> The analogy is legally binding because Title IX, 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).

“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 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)<sup>79</sup>

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. 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).<sup>80</sup> 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).<sup>81</sup> A male professor (Rick Mehta) was fired from Acadia University because of “sexist” comments (September 2018).<sup>82</sup> Catholic University of America suspended a male dean for merely questioning Julie Swetnick, who made allegations of harassment against the Supreme Court nominee, Brett Kavanaugh (October 2018).<sup>83</sup> 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 such elusive evidence upon the complaining parties.

Another obstacle is institutional resistance. Institutions often conceal or resist the disclosure of vital civil rights data in order to avoid legal liability, making it even more impractical for a reasonable complainant to obtain such evidence.

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<sup>79</sup> <https://supreme.justia.com/cases/federal/us/420/636/#tab-opinion-1951258>

<sup>80</sup> <http://www.foxnews.com/us/2018/03/12/college-student-kicked-out-class-for-telling-professor-there-are-only-two-genders.html>

<sup>81</sup> “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>

<sup>82</sup> <https://www.andrewlawton.ca/pro-free-speech-professor-rick-mehta-fired-by-acadia-university/>

<sup>83</sup> <https://thehill.com/blogs/blog-briefing-room/news/409090-catholic-university-suspends-dean-over-comment-that-degraded>

For example, Georgetown University has resisted the disclosure of such data in the past.<sup>84</sup> Likewise, Yale University resisted federal directives<sup>85</sup> and destroyed crucial information during a pending lawsuit.<sup>86</sup> While a student complainant was able to obtain data about Stanford's discriminatory policies in financial aid distribution, this data surfaced only accidentally and is not available on a routine basis.<sup>87</sup> The United States can easily overcome this problem by requesting copies of internal complaints filed with Cornell University, in addition to conducting unbiased polls and interviews (both with Cornell students, and with the public at large) to solicit public opinion.

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: OCR<sup>88</sup> and DOJ: CRD<sup>89</sup> 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, significant public support exists behind the public policy proposed herein. For example, after Yale University was placed under a similar investigation, an article by Fox News gathered 1,500+ positive comments.<sup>90</sup> A video by Stephanie Hamill received 1.4 million views.<sup>91</sup> Two articles about similar complaints (published on Campus Reform) were shared 12,000+ times

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<sup>84</sup> "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/>

<sup>85</sup> "Despite the Trump administration's reversal of Obama-era policies encouraging schools to use affirmative action to diversify their student bodies, Yale will continue to use race as a factor in admissions." <https://yaledailynews.com/blog/2018/07/05/yale-to-continue-using-race-in-admissions-defying-trump-administration/>

<sup>86</sup> "The destruction of those notes could be a violation of federal law, legal experts say." <https://yaledailynews.com/blog/2018/09/21/legal-experts-yale-may-have-violated-clery-act/>

<sup>87</sup> <https://www.sfchronicle.com/education/article/Stanford-University-data-glitch-exposes-truth-12396695.php>

<sup>88</sup> <https://www.algemeiner.com/2018/09/07/education-dept-to-probe-whether-rutgers-university-tolerates-hostile-environment-for-jewish-students/>

<sup>89</sup> <https://www.thecrimson.com/article/2018/5/23/yir-admissions-analysis/>

<sup>90</sup> Please refer to p. 102 in the survey.

[https://d25d2506sfb94s.cloudfront.net/cumulus\\_uploads/document/7dh1943i0z/econTabReport.pdf](https://d25d2506sfb94s.cloudfront.net/cumulus_uploads/document/7dh1943i0z/econTabReport.pdf)

<sup>91</sup> <https://www.facebook.com/Americanvoicesthedailycaller/videos/683586881973534/>

on social media.<sup>92</sup> 61% of male students at Yale University agree (at least in part) with the operational logic of the complaint, according to at least one poll conducted by Yale itself, and 26% of male students believe they were specifically victims of anti-male discrimination themselves.<sup>93</sup> According to recent poll conducted by YouGov, 69% of all Americans believe that men face discrimination to some extent. 74% of men believe that such discrimination occurs, while 63% of women agree that men face some degree of discrimination (p. 102).<sup>94</sup> There are other examples of the American public reacting sharply against anti-male policies. For example, a YouTube video about a Gillette ad has garnered more than a million negative votes, despite anecdotal concerns that YouTube may be using botware to boost positive votes.<sup>95</sup> Given such popular support, no agent of the United States has the liberty to shirk his/her duty to the democratic will of the people by refusing to prosecute complaints of this kind.

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.

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<sup>92</sup> <https://www.campusreform.org/?ID=11249> && <https://www.campusreform.org/?ID=10899>

<sup>93</sup> <https://yaledailynews.com/blog/2018/09/16/mens-rights-move-in-on-yale/>

<sup>94</sup> [https://d25d2506sfb94s.cloudfront.net/cumulus\\_uploads/document/7dh1943i0z/econTabReport.pdf](https://d25d2506sfb94s.cloudfront.net/cumulus_uploads/document/7dh1943i0z/econTabReport.pdf)

<sup>95</sup> <https://www.youtube.com/watch?v=koPmuEyP3a0>

## LIST OF EXCLUSIONARY PROGRAMS

This list includes some exclusionary programs and scholarships, external or internal, active as of October 2018. 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 Cornell University.<sup>96</sup> Title IX also prohibits discrimination in programs which are externally funded if these programs receive any kind of endorsement/assistance by Cornell. This includes mere *listing*.<sup>97</sup> There are no male-only programs operative at Cornell University which can balance the female-only programs listed herein.

1. **Cornell University** violates Title IX by expressing an unlawful preference for women in its employment/hiring practices.

a. **Cornell's 6.6.1 Policy** defines "women" as beneficiaries of affirmative action (p. 6).<sup>98</sup> Moreover, **Cornell's Affirmative Action Statement** lists "women" as beneficiaries.<sup>99</sup> A general sense of bias can be inferred from these definitions.

b. A more precise breakdown of Cornell's affirmative action policies can be found in an **Annual Initiatives Spreadsheet**. Cornell implements affirmative action for women in disciplines wherein they are allegedly underrepresented,<sup>100</sup> even though women are the majority of the students and the professoriate and even though Cornell does not implement affirmative action for men in the fields wherein they are underrepresented. The following departments engage in discrimination against men by citing affirmative action for women:

i. **Faculty of Computing and Information Science:**  
"we will continue a program of actions aimed at

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<sup>96</sup> "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 must use its discretion in a manner which maximizes its opposition to civil rights violations against men, consistent with the intentionality of Supreme Court doctrine. If OCR chooses to narrow the scope of its discretion, OCR must state the reasons behind the decision. Please note that OCR is already using its discretion to launch compliance reviews against institutions that allegedly engage in discrimination against women. Therefore, OCR's refusal to launch compliance reviews to combat discrimination against men (while launching such reviews to combat alleged discrimination against women) may be actionable under Title IX.

<sup>97</sup> 34 CFR §106.37(a)(2).

<sup>98</sup> [https://www.dfa.cornell.edu/sites/default/files/vol6\\_6\\_1.pdf](https://www.dfa.cornell.edu/sites/default/files/vol6_6_1.pdf)

<sup>99</sup> <https://hr.cornell.edu/sites/default/files/documents/president.pdf>

<sup>100</sup> <https://diversity.cornell.edu/sites/default/files/uploaded-files/Annual%20Initiatives%202017-2018%20v5.pdf>

increasing the number of current and prospective women and URMs in our undergraduate programs” (p. 7). This extends to undergraduate and graduate students, as well as faculty.

- ii. **College of Engineering** (p. 9). Affirmative action is offered to speakers and “application pool” through a multi-year program.
- iii. **Graduate School**. Affirmative action for “women in some fields” (p. 10).
- iv. **School of Hotel Administration** (p. 12). The language suggests unconstitutional quotas.
- v. **SC Johnson School of Management** (p. 16). “The Office of Diversity and Inclusion in conjunction with the Admissions Office seeks to increase the percentage of URMs and women in the 2-year MBA program.”
- vi. **Cornell Law School** (p. 17). “Increasing the gender and racial diversity of the faculty.” Discrimination in hiring practices also implied.

**2. Feminist, Sexuality, and Women’s Studies** at Cornell University violates Title IX.<sup>101</sup> While the *overall effect* is hostile, we propose the following criteria for analysis.

- a. There is no Men’s Studies Department at Cornell University.<sup>102</sup>
- b. The name of the department invokes women only.
- c. The program’s emphasis on “feminism” augments an inference of bias.<sup>103</sup> “Feminism” is defined as “organized activity on behalf of women's rights and interests.”<sup>104</sup> Moreover, women who strongly identify as feminists are more likely to sacrifice men in ethical dilemmas, according to sociological studies on the subject.<sup>105</sup>

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<sup>101</sup> <https://www.cornellcollege.edu/gender-sexuality-and-womens-studies/>

<sup>102</sup> The creation of a Men’s Studies program is not a hypothetical request and there are many intellectuals, academics, and activists who would be interested in teaching gender issues from this specific perspective. These activists believe their perspectives are distinct enough to constitute a separate branch, instead of integration into current Women’s Studies curriculum. We can file a formal petition with Cornell University to create such a program and submit a preliminary curriculum, if required. Likewise, there are students who would be interested in taking such courses.

<sup>103</sup> For example, their factsheet refers to feminism throughout:

<https://www.cornellcollege.edu/academics/pdfs/factsheets/GenderSexualityWomensStudiesFacts.pdf>

<sup>104</sup> <https://www.merriam-webster.com/dictionary/feminism>

<sup>105</sup> See, e.g., van Breen, Jolien A et al. “Subliminal Gender Stereotypes: Who Can Resist?” *Personality & social psychology bulletin* 146167218771895. To quote: “We found that subliminal exposure to

Therefore, the program creates a miasma of bias against men on campus.

- d. The mission statement and learning objectives explicitly stipulate “feminism,” which means that any individual who does not subscribe to feminist ideology cannot attend this program (nor teach at the program).<sup>106</sup> This creates an unlawful chilling effect upon the First Amendment rights of prospective students/scholars.
- e. Men are severely underrepresented among the professoriate (2/9).<sup>107</sup> All alumnae endorsed on the program webpage are women (6/6).<sup>108</sup>
- f. All internet resources listed on the departmental website refer to “women” and “feminism.” There are no references to men.<sup>109</sup>
- g. The history of the program clearly portrays it as a department designed for women.<sup>110</sup>

**3. Cornell Women’s Resource Center** violates Title IX.<sup>111</sup> While the *overall effect* is hostile, we propose the following criteria for analysis.

- a. There is no Men’s Resource Center at Cornell University.
- b. The name refers to women, but not men.
- c. The plain language is discriminatory against men.<sup>112</sup>

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stereotypes (vs. counter-stereotypes) led *women who identify relatively strongly with feminists*, but less strongly with women, to (a) persist in a math task, (b) show increased willingness to sacrifice men in a Moral Choice Dilemma task, and (c) show implicit in-group bias on an evaluative priming task” (abstract). The moral dilemma involves loss of life: “In four scenarios, participants are asked to sacrifice a man to save several others (of unspecified gender), and in four other scenarios they are asked to sacrifice a woman.”

<sup>106</sup> Some prescriptive statements from their homepage are as follows. “You will be asked to explore the intersections of gender, race, ethnicity, culture, class, sexuality, and nationality. You will also study forms of oppression, including sexism, heterosexism, racism, classism, ageism, ableism, and colonialism, as well as forms of bias that contribute to limited or distorted views of women's lives.” This is a prescriptive stipulation which limits the First Amendment rights of prospective applicants. <https://www.cornellcollege.edu/gender-sexuality-and-womens-studies/>

<sup>107</sup> <https://www.cornellcollege.edu/gender-sexuality-and-womens-studies/faculty/index.shtml>

<sup>108</sup> <https://www.cornellcollege.edu/gender-sexuality-and-womens-studies/careers-and-graduate-study/index.shtml>

<sup>109</sup> <https://www.cornellcollege.edu/gender-sexuality-and-womens-studies/resources-students/index.shtml>

<sup>110</sup> <https://www.cornellcollege.edu/gender-sexuality-and-womens-studies/history/index.shtml>

<sup>111</sup> <https://dos.cornell.edu/womens-resource-center>

<sup>112</sup> “The WRC champions endeavors that support *women's* education, empowerment, and advancement at Cornell and beyond. The WRC strives to be a welcoming space for people of all genders and identities. We especially encourage *women of color*, *black feminists/womanists*, queer and trans folks, and people with disabilities to drop by, attend our programming, apply for co-sponsorships, and speak with us about your concerns.” The plain language therefore suggests that while the Center is accessible to women and LGBT groups, it is not open to men.

<https://dos.cornell.edu/womens-resource-center>

- d. All programs funded through the Center (and the funding is substantial) refer to women’s groups, but there are no references to men’s groups.<sup>113</sup>
  - e. The Center hosts a library which focuses on “women’s history, feminist theory, gender and sexuality studies.”<sup>114</sup> There is no equivalent archival service which focuses on men and scholarship for men’s rights.
4. Weill Cornell Medicine violates Title IX by funding/endorsing the **Women’s Heart Program**.<sup>115</sup>
- a. The name refers to women only.
  - b. There is no equivalent program at Cornell University which focuses on the cardiological needs of men. This is despite the fact that men are twice more likely to have heart attacks through life than women.<sup>116</sup> Also, men are more susceptible to heart diseases than women.<sup>117</sup>
  - c. The plain language is discriminatory against men.<sup>118</sup>
  - d. All four physicians in the program are women.<sup>119</sup>
5. Weill Cornell Medicine violates Title IX by funding/endorsing the **Iris Cantor Women’s Health Center**.<sup>120</sup>
- a. The name refers to women only.
  - b. There is no Men’s Health Center at Cornell University.
  - c. The plain language is discriminatory against men.<sup>121</sup>
  - d. There is no balancing *overall effect*. Weill Cornell Medicine does offer a list of programs and services which are

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<sup>113</sup> Examples include: “(not so) Average Women, Black Women’s Support Network, I Love Female Orgasm, *Las Femmes* de Substance, Women of Color Coalition, Building Ourselves through Sisterhood and Service, Scientista, Smart Women Securities, Society for Women in Business, Women in Healthcare Leadership.”

<sup>114</sup> <https://dos.cornell.edu/womens-resource-center/funding-sponsorship>

<sup>115</sup> <https://dos.cornell.edu/womens-resource-center/search-our-collection>

<sup>116</sup> <https://cardiology.weillcornell.org/clinical-services/womens-heart>

<sup>117</sup> <https://www.health.harvard.edu/heart-health/throughout-life-heart-attacks-are-twice-as-common-in-men-than-women>

<sup>118</sup> <https://www.telegraph.co.uk/men/active/mens-health/11723374/Why-do-men-suffer-more-heart-problems-than-women.html>

<sup>119</sup> “The cardiologists at Weill Cornell Medicine’s Women’s Heart Program are experts in caring for women’s unique cardiovascular health needs. Our mission is to identify women at increased risk for heart disease, prevent disease development and progression, as well as improve overall health and social wellbeing.”

<sup>120</sup> <https://cardiology.weillcornell.org/clinical-services/womens-heart>

<sup>121</sup> *Ibid.*

<sup>122</sup> <https://weillcornell.org/services/iris-cantor-womens-health-center>

<sup>123</sup> “The Iris Cantor Women’s Health Center offers one of the most comprehensive arrays of healthcare services designed specifically for women in New York City.”

available to both men and women. For example, the Reproductive Medicine program does not violate Title IX because it offers health services to both men and women. Likewise, Weill Cornell offers two sex-specific programs (Urology and Gynaecology) which have an overall balancing effect. The reason Women's Health Center violates Title IX is because there is no equivalent program which specializes in men's health issues.<sup>122</sup>

**6. The Weill Cornell Psychiatry Specialty Center** violates Title IX because it denies services to men.<sup>123</sup>

- a. The plain language is discriminatory. The Center lists the following populations as healthcare recipients: "children, teens, women, families, couples, older adults." Single men are categorically and specifically excluded.<sup>124</sup>
- b. Weill Cornell offers no equivalent psychiatric service elsewhere.<sup>125</sup>
- c. Men are underrepresented among psychiatrists (6/21).<sup>126</sup> While disproportionate enrollment does not state a Title IX violation per se, this imbalance is probative in terms of understanding Allegation 6a.<sup>127</sup>

**7. President's Council of Cornell Women** violates Title IX.<sup>128</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men.
- c. All members are women.<sup>129</sup>
- d. The program uses substantial funding. For example, they have raised at least \$297 million.<sup>130</sup>
- e. The program offers scholarships which are available for women only.<sup>131</sup>

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<sup>122</sup> <https://weillcornell.org/services>

<sup>123</sup> <https://weillcornell.org/services/psychiatry>

<sup>124</sup> <https://weillcornell.org/services/psychiatry/weill-cornell-psychiatry-specialty-center/about-the-center/populations-we-serve>

<sup>125</sup> <https://weillcornell.org/services>

<sup>126</sup> <https://weillcornell.org/services/psychiatry/weill-cornell-psychiatry-specialty-center/our-care-team>

<sup>127</sup> Put in other words, Weill Cornell Psychiatry Specialty Center violates Title IX not by refusing to recruit men but because it denies services to single men. Injunctive relief would consist of compelling the Center to offer services to single men.

<sup>128</sup> <https://alumni.cornell.edu/volunteer/leadership/pccw/>

<sup>129</sup> *Ibid.*

<sup>130</sup> *Ibid.*

<sup>131</sup> <https://alumni.cornell.edu/volunteer/leadership/pccw/mission-and-history/>

- f. The mission statement clearly excludes men.<sup>132</sup>
- g. PCCW receives substantial assistance from Cornell University. Specifically, it uses the Cornell logo (which confers a reputational benefit) and its events use campus space. Moreover, the organic relationship between Cornell University and PCCW can be gleaned from their mission statement.<sup>133</sup> The organization was created by Cornell trustees.<sup>134</sup>

## 8. Cornell Center for Women, Justice, Economy, Technology violates Title IX.<sup>135</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men.
- c. The Faculty Director is a woman and so is the Chair.<sup>136</sup> The mission statement mentions women only and also makes it clear that the program receives substantial assistance from Cornell.<sup>137</sup>
- d. The Center violates Title IX by offering a free online program to women, but not men.<sup>138</sup>

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<sup>132</sup> "To champion *women* students, faculty, staff, and *alumnae* as they lead within their fields at Cornell University and across the world." *Ibid.*

<sup>133</sup> "The President's Council of Cornell Women (PCCW) was founded in 1990 by then-President Frank H. T. Rhodes with the guiding leadership of trustees Lilyan Affinito '53 and Patricia Carry Stewart '50. It has since grown into a group of highly accomplished *alumnae* working to champion *women* students, faculty, staff, and *alumnae* as they lead within their fields at Cornell University and across the world, by:

- (1) Achieving alignment with the president on those issues of greatest importance to Cornell *women*,
- (2) Engaging accomplished *alumnae* by strengthening their ties to each other and to Cornell,
- (3) Offering guidance to and serving as role models for Cornell *women*,
- (4) Providing financial support for Cornell *women* through PCCW grants and scholarships,
- (5) Initiating and supporting programs that attract and retain Cornell *women* students/faculty/staff, develop their leadership skills, and enhance their overall quality of life."

<https://alumni.cornell.edu/volunteer/leadership/pccw/mission-and-history/>

<sup>134</sup> *Ibid.*

<sup>135</sup> <https://www.lawschool.cornell.edu/womenandjustice/About-Us/Our-Work.cfm>

<sup>136</sup> <https://www.lawschool.cornell.edu/womenandjustice/About-Us/index.cfm>

<sup>137</sup> "The Mission of Cornell Center for Women (JET) is to work on initiatives relating to women, justice, the economy and technology. Cornell Women (JET) brings together representatives ... to improve women's access to justice, economic opportunity and social progress. The Center began in 2009 with a generous grant from the Avon Foundation for Women. Since then it has undertaken several major initiatives ... The Center continues to expand its scope with the launch of Cornell Tech to harness the power of technology to promote and secure women's economic and social progress" (*Ibid.*).

<sup>138</sup> "Women entrepreneurs can apply for the online program, which will be offered at no cost." <https://www.lawschool.cornell.edu/womenandjustice/Clinical-Projects/Clinical-Projects.cfm>

- e. The Center violates Title IX by perpetuating negative stereotypes about masculinity.<sup>139,140</sup> This stereotyping has a chilling effect on male victims and creates a prejudicial effect against accused men. Men and women experience sexual victimization at equal rates<sup>141</sup> and the overwhelming majority of male victims report female perpetrators.<sup>142</sup>

**9. The Dorothea S. Clarke Program in Feminist Jurisprudence violates Title IX.<sup>143</sup>**

- a. The emphasis on women is discriminatory against male applicants.
- b. The emphasis on feminism curtails the First Amendment rights of prospective applicants.
- c. The two professors to hold this endowment were both women.<sup>144,145</sup>

**10. Cornell Women in Leadership Class violates Title IX.<sup>146</sup>**

- a. The name refers to women only.
- b. The classes explore issues that would only interest women.
- c. Cornell offers no equivalent program for men.
- d. The plain language is discriminatory against men.<sup>147</sup>

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<sup>139</sup> For example, the search criteria used in the Center's publication indicates sexist stereotyping. There are references to *female* genital mutilation, *femicide*, and *female infanticide*. There are no references to violence against men.

<https://www.lawschool.cornell.edu/womenandjustice/Legal-and-Other-Resources/SearchResources.cfm>

<sup>140</sup> A list of resources developed by the Center stereotypes men as perpetrators and women as victims. In addition, even though the majority of prisoners are men worldwide, the Center offers emphasis on advocacy for female prisoners.

<https://www.lawschool.cornell.edu/womenandjustice/Legal-and-Other-Resources/Center-Legal-Analysis.cfm>

<sup>141</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4062022/>

<sup>142</sup> <https://www.sciencedirect.com/science/article/pii/S1359178916301446?via%3Dihub>

<sup>143</sup> [https://scholarship.law.cornell.edu/avon\\_clarke/](https://scholarship.law.cornell.edu/avon_clarke/)

<sup>144</sup> [https://www.lawschool.cornell.edu/alumni/giving/endowed\\_funds/professorships-a-m.cfm#CP\\_JUMP\\_46631](https://www.lawschool.cornell.edu/alumni/giving/endowed_funds/professorships-a-m.cfm#CP_JUMP_46631)

<sup>145</sup> Injunctive relief would thus consist of removing the emphasis on women and feminism as a requirement for the endowment.

<sup>146</sup> <https://www.ecornell.com/certificates/leadership-and-strategic-management/women-in-leadership/>

<sup>147</sup> For example, one of the constituent courses is open only to "*women* who are mid- to-senior level managers, regardless of whether they have a formal team to lead. This course is also meant for *women* who aspire to move into leadership roles and have a minimum 3-5 years professional experience."

<https://www.ecornell.com/courses/leadership-and-strategic-management/women-in-leadership-negotiation-skills/>

**11. The Bank of America Institute for Women’s Entrepreneurship at Cornell** violates Title IX.<sup>148</sup>

- a. The name of the institute refers to women only.
- b. The plain language is discriminatory.<sup>149,150</sup>
- c. Cornell has never pledged to create an institute for men, even though men are the minority of Cornell students. Nor does Cornell offer any affirmative action programs for men in the fields wherein they are underrepresented on a national scale (for example, Law or Medicine or the Humanities).
- d. The program clearly receives funding from Cornell, in addition to using campus resources and the Cornell logo.<sup>151</sup>

**12. Cornell Women in Physics and Related Fields** violates Title IX.<sup>152</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men.
- c. The plain language is discriminatory against men.<sup>153</sup>
- d. All members are women (40/40).<sup>154</sup>
- e. The organization uses campus space and the Cornell logo, which imparts substantial reputational benefit.

**13. Cornell Johnson School Women in Business** violates Title IX.<sup>155</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men in the MBA program. Nor does Cornell offer any affirmative action programs for men in the disciplines wherein they are underrepresented.
- c. The plain language is discriminatory against men.<sup>156</sup>
- d. All members are women (65/65).<sup>157</sup>

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<sup>148</sup> <https://www.forbes.com/sites/amyguttman/2018/08/31/cornell-bank-of-america-launch-free-courses-for-women-entrepreneurs/#3e4a9955d148>

<sup>149</sup> The course is aimed at “*women* starting and/or building emerging for-profit businesses. The target is to educate 5000 *women* in the next 4 years.” *Ibid.*

<sup>150</sup> “*Women* entrepreneurs can register for the online program, which is offered at no cost.”  
<http://www.bofainstitute.cornell.edu/program.php>

<sup>151</sup> <http://www.bofainstitute.cornell.edu/program.php>

<sup>152</sup> <https://physics.cornell.edu/women-in-physics>

<sup>153</sup> “WiP+ is an informal group of *women* (primarily) supporting other *women*.” *Ibid.*

<sup>154</sup> <https://physics.cornell.edu/sites/physics/files/wip-group-photo.jpg>

<sup>155</sup> <https://www.johnson.cornell.edu/Office-of-Diversity-Inclusion/Women-at-Johnson/Johnson-Women-in-Business>

<sup>156</sup> “Johnson Women in Business (JWIB) is our *female* student hosting event on the Cornell University campus.”

<sup>157</sup> <https://www.johnson.cornell.edu/portals/32/images/ODI/JWIB/JWIB-2018-group-2-833x.jpg>

**14. Cornell Society for Women in Business** violates Title IX.<sup>158</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men in the MBA program. Nor does Cornell offer any affirmative action programs for men in the disciplines wherein they are underrepresented.
- c. The plain language is discriminatory against men.<sup>159</sup>
- d. All board members are women (11/11).<sup>160</sup>
- e. All members of the Emerging Leaders Program are women (22/22).<sup>161</sup>

**15. Cornell Johnson School Women in Tech** violates Title IX.<sup>162</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men in STEM. Nor does Cornell offer any affirmative action programs for men in the disciplines wherein they are underrepresented.
- c. The plain language is discriminatory against men.<sup>163</sup>
- d. All committee members are women (14/14).<sup>164</sup>

**16. Women in Computing at Cornell** violates Title IX.<sup>165</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men.
- c. All individuals in leadership positions are women (41/41).<sup>166</sup>
- d. All participants are women.<sup>167,168</sup>
- e. The program has a meaningless disclaimer which claims that “all genders are welcome.” But this statement is irrational, given the totality of the circumstances.

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<sup>158</sup> <http://cornellswib.strikingly.com/>

<sup>159</sup> “The Society for Women in Business (SWIB), affiliated with Cornell's Dyson School, is the largest undergraduate business organization for *women* at Cornell, connecting students of all majors with each other and with professional leaders in the business world. We aim to empower talented and intelligent *women* through education and experience.” *Ibid.*

<sup>160</sup> *Ibid.*

<sup>161</sup> *Ibid.*

<sup>162</sup> <https://www.johnsonwomenintech.com/>

<sup>163</sup> “Create a forum for *women* MBAs, industry leaders and advocates.” *Ibid.*

<sup>164</sup> <https://www.johnsonwomenintech.com/2017-committee/>

<sup>165</sup> <https://wicc.acm.org/about>

<sup>166</sup> *Ibid.* [all sections under “Leadership” button].

<sup>167</sup> <https://www.instagram.com/p/Ba48UtGBDFG/>

<sup>168</sup> <https://www.instagram.com/p/BZ6dHooh77f/>

**17. Cornell Real Estate Women** violates Title IX.<sup>169</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men.
- c. The plain language is discriminatory against men.<sup>170</sup>
- d. All members are women, except the male clerk (6/7).<sup>171</sup>
- e. The program uses campus space and the Cornell logo, which imparts substantial reputational benefit.

**18. Cornell Women's Management Council** violates Title IX.<sup>172</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent program for men.
- c. The plain language is discriminatory against men.<sup>173</sup>
- d. All members are women.<sup>174</sup>
- e. All officers are women (10/10).<sup>175</sup>

**19. Cornell Graduate Women in Science** violates Title IX.<sup>176</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent STEM program for men. Nor does Cornell offer any affirmative action programs for men in the fields wherein they are underrepresented.
- c. Women are overrepresented among past and present members (19/20).<sup>177</sup>
- d. Their mission statement, while deliberately manipulative and self-contradictory to some degree, emphasizes discrimination against men.<sup>178</sup>

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<sup>169</sup> <http://cornellrewomen.wixsite.com/cornellrew>

<sup>170</sup> "CornellREW is Cornell's primary graduate and professional student organization dedicated to the promotion and advancement of *women* in real estate ... attract *female* speakers ... increase the visibility of *women* ..." *Ibid.*

<sup>171</sup> <http://cornellrewomen.wixsite.com/cornellrew/board>

<sup>172</sup> <https://johnson.campusgroups.com/wmc/about/>

<sup>173</sup> "The WMC sponsors efforts to increase the enrollment of *women* within the Johnson School, influences the environment around us to promote and support *women* in business, provides a structure for connecting with current and future *women* leaders, and supports the diverse professional and personal aspirations of *women* within our community." *Ibid.*

<sup>174</sup> [https://johnson.campusgroups.com/upload/johnson/2017/flyer\\_image\\_upload\\_430720\\_Johnson\\_DivInc\\_09062017\\_RachelPhilipson\\_9977\\_916134625.jpg](https://johnson.campusgroups.com/upload/johnson/2017/flyer_image_upload_430720_Johnson_DivInc_09062017_RachelPhilipson_9977_916134625.jpg)

<sup>175</sup> <https://johnson.campusgroups.com/wmc/officers/>

<sup>176</sup> <https://gwiscornell.weebly.com/>

<sup>177</sup> <https://gwiscornell.weebly.com/our-team.html>

<sup>178</sup> They claim that their mission is to "improve the lives of those in STEM fields, especially those whom are *women-identified* ... we uphold that improving the scientific culture to help *women* and gender minorities thrive in the sciences requires improving the working conditions for everyone in our community, especially all marginalized groups." Women are not a minority at Cornell, so the statement is both false and paradoxical.

**20. Cornell Women in Mathematics violates Title IX.**<sup>179</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent STEM program for men. Nor does Cornell offer any affirmative action programs for men in the fields wherein they are underrepresented.
- c. All officers are women (4/4).<sup>180</sup>
- d. The mission statement is discriminatory against men.<sup>181</sup>
- e. The mentoring program aims to match women with women, indicating clear discrimination.<sup>182</sup>
- f. All associates/sponsors of CWIM are programs which discriminate against men: Association for Women in Mathematics, GPWomen, GWIS, oSTEM, Cornell Women's Resource Center.<sup>183</sup>
- g. While there is a disclaimer stating that "men are welcome," this disclaimer is meaningless and irrational, given the circumstances explained above.

**21. Cornell Chemical and Biomedical Engineering Graduate Women's Group violates Title IX.**<sup>184</sup>

- a. The name refers to women only.
- b. Cornell offers no equivalent STEM program for men. Nor does Cornell offer any affirmative action programs for men in the fields wherein they are underrepresented.
- c. The plain language is discriminatory against men.<sup>185</sup>
- d. All participants are women.<sup>186</sup>

**22. The Cook Awards (Alice H. Cook and Constance E. Cook) violate Title IX.**

- a. The awards have a pronounced emphasis on women and their advancement, which creates an unlawful *preference* against male applicants (Title IX prohibits sex-specific

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<sup>179</sup> <http://pi.math.cornell.edu/~awm/>

<sup>180</sup> *Ibid.*

<sup>181</sup> "The goal of the Cornell Student Chapter of the Association for Women in Mathematics is threefold: (1) Increase the number of undergraduate women enrolled in mathematics courses at Cornell. (2) Create a network of support for the women (undergraduate and graduate) who are studying math at Cornell. (3) Provide a forum in which issues pertaining to women in math can be discussed." *Ibid.* The overall effect of this mission statement is discriminatory.

<sup>182</sup> <http://pi.math.cornell.edu/~awm/events.html>

<sup>183</sup> <http://pi.math.cornell.edu/~awm/links.html>

<sup>184</sup> <https://cbegwg.cbe.cornell.edu/>

<sup>185</sup> "The CBEGWG is an organizational unit whose purpose is to focus on issues pertinent to *female* affiliates of the School of Chemical and Biomolecular Engineering, 2) to encourage young *girls* to enter engineering through outreach." *Ibid.*

<sup>186</sup> For example: [https://cbegwg.cbe.cornell.edu/documents/2016\\_CBE\\_Women\\_Flyer.pdf](https://cbegwg.cbe.cornell.edu/documents/2016_CBE_Women_Flyer.pdf)

*preferences* in addition to blatant discrimination) and also a *hostile environment* against men on campus.<sup>187</sup>

- b. Women are overrepresented among awardees (15/17).<sup>188</sup>
- c. Cornell offers no awards that are dedicated to improving campus climate for the male minority.
- d. While the awards are gender-neutral on paper, i.e. available to both men and women, this disclaimer is irrational (considering the totality of circumstances).

**23. The Curie Academy violates Title IX.**<sup>189</sup>

- a. The plain language is discriminatory against boys.<sup>190</sup>
- b. All participants are girls.<sup>191</sup>

**24. Cornell Graduate and Professional Women's Network violates Title IX.**<sup>192</sup>

- a. The name refers to women only.
- b. Cornell offers no similar professional network for men.
- c. The plain language is discriminatory.<sup>193</sup>
- d. All speakers and participants in all past events were women.<sup>194</sup>

**25. Cornell University violates Title IX by endorsing 390 scholarships on its database, all of which are available for women only.**<sup>195</sup> There is no rational basis for this endorsement. Title IX prohibits an institution from even *listing* external programs which are discriminatory. The *overall effect* is clearly discriminatory, given the

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<sup>187</sup> This can be gleaned from their selection criteria: "nomination letters should describe the individual's commitment to *women's issues* and efforts to enhance the *climate for women* at Cornell." There is no rational basis for devoting resources to "improving the climate for women at Cornell" when they are already the majority among students *and* professors. This unconstitutional sex-based preference would survive neither strict nor intermediate scrutiny.

<sup>188</sup> <https://cpb-us-e1.wpmucdn.com/blogs.cornell.edu/dist/8/6767/files/2017/03/Cook-Awards-2017-0087-1axos95-1024x683.jpg>

<sup>189</sup> <https://sites.coecis.cornell.edu/curieacademy/>

<sup>190</sup> "Curie Academy is a one-week residential program for high school girls who excel in math and science." *Ibid.*

<sup>191</sup> <https://cpb-us-w2.wpmucdn.com/sites.coecis.cornell.edu/dist/5/110/files/2016/11/curiehome-2nhcq6s.jpg>

<sup>192</sup> <https://sites.google.com/a/cornell.edu/gpwomen/>

<sup>193</sup> "The purpose of Cornell's Graduate & Professional *Women's Network* (GPWomeN) is to provide a unified voice for Cornell's graduate and professional student *women* ... support graduate and professional student *women* at Cornell University and beyond." *Ibid.*

<sup>194</sup> <https://sites.google.com/a/cornell.edu/gpwomen/events/past-events>

<sup>195</sup> "There are approximately 390 different external fellowship programs that are available to support and promote *women* graduate students. Our *women* graduate students and postdoctoral scholars may be eligible for this support (type demographic "*women*" for more information)." <https://gradschool.cornell.edu/student-experience/student-communities/womens-communities/>

massive number of female-only scholarships endorsed for the female majority. Injunctive relief would consist of banning all such discriminatory scholarships (if they are funded by Cornell) or compelling Cornell to sever all ties with such offerings, including removing them from any webpages or databases, if they are funded by external sponsors.

**26. Cornell University** violates Title IX by listing/endorsing various internal and external programs which discriminate against men. Injunctive relief would thus consist of compelling Cornell to sever all ties with these discriminatory organizations (or compelling Cornell to create similar programs for men). Significant assistance is presumed since they receive their funding from Cornell and/or use campus space and/or use the Cornell logo.

- a. The Women's Resource Center lists the following gynocentric resources. Significant assistance is presumed since they receive their funding from the WRC, as explained on the webpage.<sup>196</sup> Their names and network of associations clearly express discrimination against men.
  - i. (not so) Average Women
  - ii. Black Women's Support Network
  - iii. Las Femmes de Substance
  - iv. Women of Color Coalition
  - v. Building Ourselves through Sisterhood and Service
  - vi. Scientista
  - vii. Smart Women Securities<sup>197</sup>
  - viii. Society for Women in Business
  - ix. Women in Healthcare Leadership
- b. Cornell Graduate School lists/endorses the following discriminatory organizations.<sup>198</sup> Both organizations engage in obvious discrimination against men.
  - i. American Association for University Women
  - ii. Association for Women in Science

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<sup>196</sup> <https://dos.cornell.edu/womens-resource-center/funding-sponsorship>

<sup>197</sup> The Department of Education has already launched an investigation against a chapter of Smart Women Securities (#09-18-2031, Title IX Complaint Against the University of Southern California).

<sup>198</sup> "The Cornell University Graduate School is a proud member of the AAUW." Association for Women in Science is also listed.

<https://gradschool.cornell.edu/student-experience/student-communities/womens-communities/>

## INJUNCTIVE RELIEF

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

- The removal of discriminatory language, whenever proper.
- The elimination of affirmative action on the basis of sex, in whatever context appropriate.
- The elimination of discriminatory programs within a reasonable time period, whenever proper.
- The conversion of discriminatory programs into gender-neutral programs within a reasonable time period, whenever proper. 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 Title IX precedent for such conversion.<sup>199</sup>
- The creation of male-specific or male-focused programs and/or scholarships and/or research centers to offset the balance, whenever proper. There is Title IX precedent for the creation of such programs.<sup>200</sup> We can submit a prospective syllabus and a list of potential hires for a hypothetical Men's Studies Department, if need be.
- Any other form of injunctive relief, whenever proper (such as a future ban on all such programs).

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<sup>199</sup> 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.

<sup>200</sup> "Stanford University informed OCR that it has modified the weightlifting program. It has now instituted both "men-focused" and "women-focused" weightlifting hours, which are open to all students regardless of gender. Both weightlifting sessions are open for the same amount of time two times a week. The University submitted documentation to OCR on March 9, 2018 showing their response to the Stanford Daily newspaper article regarding the women's only weightlifting hours" (#09-18-2175).

## MODEL PROGRAM

It is reprehensible that Cornell University does not offer a single male-only program which might counterbalance the massive number of female-only programs listed above. We condemn this discrimination. We contend that no reasonable person can find, given the *overall effect*, that Cornell does not discriminate against the male minority.

That being said, Cornell has one institute which can be cited as a template for ameliorating some of the programs listed in this complaint. The Cornell Institute for Women in Science (CIWS)<sup>201</sup> does not seem to violate Title IX for two reasons. One, there is a balanced sex ratio among CIWS scholars. Two, the studies published by CIWS reflect ideological diversity and scientific rigor. For example, CIWS published a study, cited in this complaint, which found that women are more likely to be recruited for STEM positions than men. The study, unlike most scholarship produced by Women's Studies Departments, is scientifically precise and rigorous. As such, CIWS stands in stark contrast to other Cornell programs in which scholars/professors are expected to conform to a specific sex-based ideology i.e. feminism when applying to the position, which has a chilling effect on the First Amendment rights of such scholars. **(Allegations 2c-2f, 3c-3e, 8e, 9b, 22a).**

No such chilling effect seems to exist at the Cornell Institute for Women in Science. We thus choose not to include the Cornell Institute for Women in Science among programs that violate Title IX, and we commend CIWS for its viewpoint diversity. We also commend CIWS for having a balanced sex ratio among its research staff. However, we would still recommend a name change (e.g. *Cornell Institute for Men and Women in Science*) and a greater push for viewpoint diversity.

This disclaimer does not diminish the discriminatory impact of Allegations 1-26. The United States must assess the *overall effect* at Cornell before inspecting each program on its own merits.

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<sup>201</sup> <https://www.human.cornell.edu/hd/research/labs/ciws/home>

**ADDENDUM**  
**(LIST OF DISCRIMINATORY PROGRAMS)**

1. Cornell University (*employment/recruitment preferences*)
2. Cornell Gender, Sexuality, Women's Studies
3. Cornell Women's Resource Center
4. Women's Heart Program
5. Iris Cantor Women's Health Center
6. Weill Cornell Psychiatry Specialty Center
7. President's Council of Cornell Women
8. Cornell Center for Women, Justice, Economy, Technology
9. Cornell Dorothea S. Clarke Program in Feminist Jurisprudence
10. Cornell Women in Leadership Class
11. Cornell & Bank America Launch Free Courses
12. Cornell Women in Physics and Related Fields
13. Cornell Johnson School Women in Business
14. Cornell Society for Women in Business
15. Cornell Johnson School Women in Tech
16. Women in Computing at Cornell
17. Cornell Real Estate Women
18. Cornell Women's Management Council
19. Cornell Graduate Women in Science
20. Cornell Women in Mathematics
21. Chemical and Biomedical Engineering Graduate Women's Group
22. Cook Awards for Women
23. The Curie Academy
24. Cornell Graduate and Professional Women's Network
25. External scholarships (listing/endorsement)
26. External and internal programs (listing/endorsement)
  - a. Programs affiliated with CWRC
    - i. (not so) Average Women
    - ii. Black Women's Support Network
    - iii. Las Femmes de Substance
    - iv. Women of Color Coalition
    - v. Building Ourselves through Sisterhood and Service
    - vi. Scientista
    - vii. Smart Women Securities
    - viii. Society for Women in Business
    - ix. Women in Healthcare Leadership
  - b. Programs endorsed by Graduate School
    - i. American Association for University Women
    - ii. Association for Women in Science