# **Executive Summary**

# **Final Investigation Report**

# **Complainant**

Maha Hasan Alshawi, former Dartmouth PhD student

# Respondents

Gary Sund, Deputy Title IX Coordinator

Kristi Clemens, Title IX Coordinator

Prasad Jayanti, Professor, Computer Science

Amit Chakrabarti, Professor, Computer Science

Antonio Ferrantino, former Director, Institutional Diversity and Equity

Daniel Rockmore, Associate Dean for the Sciences

Keriann Ketcham, Associate Director, Office of Visa and Immigration Services

Gary Hutchins, Registrar and Assistant Dean, Guarini School of Graduate and Advanced Studies

July 29, 2021

Maureen Holland, Esq. Peter Lim, Esq.



# **Executive Summary**

# I. OVERVIEW OF INVESTIGATION

On or about August 5, 2020, Dartmouth College engaged Maureen Holland and Peter Lim of the Institutional Response Group at Cozen O'Connor to conduct an investigation into allegations of Sexual or Gender-Based Harassment, Retaliation and/or Discrimination made by then-PhD student Maha Hasan Alshawi ("Complainant") against nine Dartmouth employees. At the request of the parties and the College, each of the final investigation reports will be made public. We published our first report—which related to Complainant's reports about Respondent Alberto Quattrini Li, Professor of Computer Science—on April 30, 2021. The report issued today, July 29, 2021, represents our report of all remaining allegations against the other eight Respondents.<sup>1</sup>

Our investigation included multiple interviews with Complainant and individual interviews with each Respondent. We also gathered and reviewed over 3000 pages of relevant documentation as part of our investigation.

# 1. Findings

Upon a consideration of all of the available information, we find that there is insufficient information to support, by a preponderance of the evidence, a finding that any of the named Respondents engaged in Retaliation. We also find that there is insufficient information to support a finding, by a preponderance of the evidence, that Respondent Jayanti engaged in Discrimination on the basis of religion. Therefore, we find the Respondents *not responsible* for all allegations.

# 2. Parties and Allegations

The below chart provides information about the parties and the allegations at issue in this investigation.

Gary Sund ("Respondent Sund")

Deputy Title IX Coordinator for Response

#### > Retaliation

Complainant alleged that Respondent Sund did not properly investigate or evaluate her reports regarding Professor Quattrini Li, Respondent Jayanti and/or Respondent Chakrabarti and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

<sup>&</sup>lt;sup>1</sup> On April 30, 2021, the executive summary to the report concerning Respondent Alberto Quattrini Li was posted on Dartmouth's website. On July 28, 2021, this executive summary was posted on Dartmouth's website. The full reports and appendices are available to the public upon request.

# Kristi Clemens ("Respondent Clemens")

Title IX Coordinator and Acting Senior Director of Institutional Diversity and Equity

#### > Retaliation

Complainant alleged that Respondent Clemens did not properly investigate or evaluate her reports regarding Professor Quattrini Li, Respondent Jayanti and/or Respondent Chakrabarti and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

# Prasad Jayanti ("Respondent Jayanti")

Department Chair and Professor of Computer Science

#### > Retaliation

Complainant alleged that Respondent Jayanti withheld solutions to problem sets from Complainant and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

## > Discrimination on the Basis of Religion

Complainant alleged that Respondent Jayanti withheld solutions to problem sets from Complainant and that such actions were on the basis of Complainant's religion

#### > Retaliation

Complainant alleged that Respondent Jayanti gave Complainant a "low pass" grade for her TA mark and that such action was an adverse act in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

## Discrimination on the Basis of Religion

Complainant alleged that Respondent Jayanti gave Complainant a "low pass" grade for her TA mark and that such action was on the basis of Complainant's religion

#### Retaliation

Complainant alleged that Respondent Jayanti interfered with her ability to advance to the advanced algorithms class, CS 231, and that such action was an adverse act in retaliation for Complainant filing a Title IX complaint against Professor Ouattrini Li

# Discrimination on the Basis of Religion

Complainant alleged that Respondent Jayanti interfered with her ability to advance to the advanced algorithms class, CS 231, and that such action was on the basis of Complainant's religion

#### Amit Chakrabarti ("Respondent Chakrabarti")

PhD Program Director and Professor of Computer Science

#### Retaliation

Complainant alleged that Respondent Chakrabarti agreed to but failed to continue to serve as Complainant's supervisor/research advisor and that such action was an adverse act in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

# > Retaliation

Complainant alleged that Respondent Chakrabarti forced her to identify a supervisor/research advisor when other first year PhD students did not have to do so and that Respondent Chakrabarti directed Complainant to identify an advisor by the close of business on April 3, 2020, or there would be "consequences." Complainant stated that such action was an adverse act in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

#### Retaliation

Complainant alleged that Respondent Chakrabarti informed her that her fellowship would be affected by her "low pass" TA mark and that was an adverse act in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

#### Retaliation

Complainant alleged that Respondent Chakrabarti requested that Complainant submit Problem Set 0 to him and then he would discuss her "misunderstandings of CS 31 material." Complainant alleged that was an adverse act in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

## Antonio Ferrantino ("Respondent Ferrantino")

Former Director of Institutional Diversity and Equity

#### > Retaliation

Complainant alleged that Respondent Ferrantino did not properly investigate or evaluate her reports regarding Respondent Jayanti and/or Professor Deeparnab Chakrabarti and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

# Daniel Rockmore ("Respondent Rockmore")

Associate Dean for the Sciences and Professor of Math and Computer Science

#### > Retaliation

Complainant alleged that Respondent Rockmore did not properly investigate or evaluate her reports regarding Respondent Jayanti and/or Professor Quattrini Li and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

# Keriann Ketcham ("Respondent Ketcham")

Associate Director of the Office of Visa and Immigration Services

#### Retaliation

Complainant alleged that Respondent Ketcham misled Complainant with respect to Complainant's visa and/or interfered with Complainant's ability to transfer to another institution and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

# Gary Hutchins ("Respondent Hutchins")

Registrar and Assistant Dean at Dartmouth's Guarini School of Graduate and Advanced Studies

#### Retaliation

Complainant alleged that Respondent Hutchins intentionally ignored or failed to respond adequately to Complainant's concerns and/or that Respondent Hutchins intentionally gave Complainant misleading information and that such actions were adverse acts in retaliation for Complainant filing a Title IX complaint against Professor Quattrini Li

#### 3. Complainant's Objection to Release of Final Report

On July 6, 2021, we sent all parties an initial version of the investigation report with our findings. Those findings have not changed and the final report contains only minimal revisions to reflect additional information Complainant provided on July 22, 2021. We informed Complainant and her advisor that we were prepared to issue our final report on July 28, 2021. Complainant objected and stated that she does not consent to Dartmouth sharing the final report publicly. Complainant identified several preconditions to the public sharing of the report which we evaluated and find are without merit.