

21 July 2016

TO: Dean Gloria Culver  
CC: Dr. Greg DeAngelis  
CC: Mr. Richard Crummins

I would like to report a number of concerns relating to the handling of the sexual harassment investigation of Florian Jaeger, a Professor in the Department of Brain and Cognitive Sciences at the University of Rochester.

I participated in the investigation as a witness this spring and conveyed a number of embarrassing and personal incidents that occurred when I worked as a graduate student in Dr. Jaeger's lab (2007-2008). Since my interview, I believe that Dr. Jaeger has engaged in retaliatory behavior for my cooperation as a witness. In particular, I have evidence suggesting that he is spreading rumors about my honesty and reliability to other department members.

I am especially concerned about this because I cannot see that any protections have been put in place by the University to prevent personal attacks against me for cooperating with the investigation. The way the University has conducted the investigation has fostered an environment in which Dr. Jaeger is able to defame me without consequence, using the authority of the investigation to give his false claims extra weight.

I have six specific areas of concern:

(i) I have heard from at least four other faculty members that me and my comments in the report are being widely discussed in the department. I have heard that my comments have been characterized by others who are not involved in the case as "all made up" and "lies". I have been accused of being "unreliable" and that descriptions of past events must have been too long ago for me to remember, or that I did a poor job of describing them. I believe these criticisms must have originated from Dr. Jaeger, who had direct knowledge of the case and the details of my involvement, as well as a strong incentive to discredit me.

(ii) At least one faculty member has specifically reported talking to Dr. Jaeger about me and my involvement in the University investigation. I have avoided talking to other faculty members because I was told by the University lawyer that the details of the case were confidential—in particular the names of the witnesses. However, this confidentiality does not appear to have been respected by Dr. Jaeger.

(iii) I believe that I am a named witness in the report (which, however, I have not been allowed to read) and that my name also appears in the letter to Dr. Jaeger summarizing the investigation. Unlike the complainants, I did not see what went to Dr. Jaeger with my name on it. The fact that my name was used puts me at a greater risk for retaliation. I was repeatedly assured by the University attorney (Kate Nearpass) that I would not be named and instead be given a witness number in the material provided to Dr. Jaeger. However, I volunteered to be identified, but only if it was necessary and only if I was notified of this fact, so that I could better guard against retaliation. After this offer, Ms. Nearpass assured me still that I would not be named. Recently, I learned second-hand that I was named and I was not notified. I request clarification on why the University determined it was necessary to use my name in the report; why it was necessary to use my name in the letter; whether names that I told Ms. Nearpass in confidence were also re-

vealed to Dr. Jaeger, contrary to her promise and our agreement; and why I was not notified that my name was disclosed to Dr. Jaeger, again contrary to her promise and our agreement.

(iv) Despite the well-known, regular pattern of ad-hominem attacks by sexual harassers against witnesses in investigations like these, I have not seen any evidence that University lawyers or anyone else in authority has done anything to protect me or other witnesses from the kind of retaliation in which Dr. Jaeger is now predictably engaging. In return for doing my duty to uphold the policies of the University by participating in an investigation that I did not seek or initiate, it appears to me I have been thrown under the bus, and am just expected to take whatever abuse Dr. Jaeger deems necessary to maintain his own reputation. The lack of protection, in combination with the use of my name in official University documents that were provided to Dr. Jaeger, demonstrates severe negligence.

(v) In my interview with Ms. Nearpass, I described Dr. Jaeger's tactics in the past for discrediting me, including his explanation of why I left his lab as the result of my being "attracted to him" and "immature." This put the University on notice that he was not only a harasser, but that his usual tactic to discredit people who call him out on this behavior is to defame them. My statements, plus knowledge of how he operates obtained from other witnesses, should have led the University to introduce safeguards against retaliation through defamation.

(vi) No information has been officially provided to the department's faculty members, even though Dr. Jaeger has now talked to many others about the case. As a source of information now working to spread his view of the investigation, he is clearly biased and determined to undermine my professional reputation. The official vacuum created by the University favors him, not the witnesses who entrusted their experiences to Ms. Nearpass. This has already led to a hostile work environment in which rumors about me, my honesty, and the truthfulness of what I reported in confidence to a University lawyer are circulating unchecked.

Finally, I request a disclosure of how my evidence was handled in the report. I stated in my interview that I believed prior students of Dr. Jaeger who still rely on him professionally would be unlikely to support my statements about his previous harassment. How many witnesses did the University ask about my statements or character, how many were included in the report, and how many still rely on him professionally? Was any witness who allegedly doubted my statements present at the time the sexual harassment occurred (2007-2008)? Who else provided information? Were their accounts of Dr. Jaeger's actions based on actual observation, or second-hand conversations with others, in particular, with Dr. Jaeger?

Please consider this letter to be a formal report that I am being retaliated against and defamed after testifying in the University's sexual harassment investigation of Dr. Jaeger. I request that I be protected from such illegal retaliation and defamation.

Celeste Kidd  
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Department of Brain and Cognitive Sciences  
University of Rochester