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STATEMENT OF JANE DOE 48

I am one of Tyndall's 'original' victims and speak here as evidence that he developed and perfected his predatory MO early on in his tenure at USC, a pattern that he continued to employ to gain the trust of and harm young Trojan women over decades.

It was 1989 when, at just 17 years old and trying to be a responsible grownup, I went to the USC Student Health Center for my first well-woman exam. Tyndall's grooming started immediately, with him noticing my nervousness and being overly reassuring and solicitous. He quickly gained enough of my trust to learn that I was on my own, poor, and very inexperienced.

He told me not to worry, that he would take care of me. He talked about all of the "trouble" a girl could get into in college and said that I needed to tell him everything I was doing sexually so he could protect me. He claimed his violations during the exam which included painful and prolonged vaginal and anal probing, were his giving me better care. He gaslit me while he was doing this, saying, "it doesn't hurt, does it." This was not a question but a statement.

It did hurt. A lot.

He said it was very important that I come for all of my appointments. There were a lot of appointments.

He prescribed a very expensive type of birth control that I could not afford. (I later found out that cheaper types with fewer side effects had been available.) He then “helped” me by giving me samples but held those medications hostage as he required me to come in at least twice a year for one of his very “thorough” exams.

I don't recall if he photographed me. I always kept my eyes shut during these exams, trying to breathe and relax so it wouldn't hurt so much. He did show me printed photos of other women's vaginas, to 'explain' what STDs were so that I would be more careful about my sexual activities.

He often implied that all college women are promiscuous and that's why he had to take such good care of us.

I started having mental health issues. I sought help and was told that I showed signs of sexual trauma. It was the early '90s and there was a lot of talk about 'repressed memories.' I spent a great deal of time and resources trying to figure out if I had been raped as a child. This, while Tyndall continued his abuse.

I didn't recognize his abuse as a series of assaults because I literally didn't know what was supposed to happen in an examination. I thought that was just how reproductive health care worked. The nurses who were sometimes present for his 'exams' literally looked the other way.

Looking back, I can see the connection between Tyndall's violations and the anxiety and stress-related health issues as well as difficulties with participating in medical care that have continued throughout my life. My education was also derailed for a time which impacted my career trajectory.

I am proud that I learned to cope with these effects and managed to find my way personally and professionally despite these setbacks. In fact, I've gone

beyond coping to helping others and have spent more than 20 years working with survivors of sexual and gender-based violence.

I am conscious of the layers of privilege I hold as a white, cisgender, straight, relatively affluent woman that have led to me being able to sit here today, share my story, and see some measure of justice served. I am acutely aware of how many other children, women, and trans people have suffered similar trauma, never even being heard let alone having the perpetrators of their abuse held to account.

Over those years of professional and personal experience, I have seen and heard firsthand how unsafe obstetrics and gynecology services can be. The reality is that any role that confers outsized power to an individual poses the risk of attracting people who will abuse that power. In any profession where power dynamics are as inherently skewed as they are in medicine, safeguards must be in place, complainants must be believed, and any abuses of power must be addressed immediately.

This settlement shows institutions everywhere that there is a great price to pay if they choose to ignore abusive doctors. It's past time to bring patient voices fully into the design and oversight of reproductive healthcare and it is my hope that this settlement will provide the motivation needed to make that happen.

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REPRESENTED BY ATTORNEY GLORIA ALLRED AND

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