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### **Statement of Gloria Allred**

On May 22, 2018 my law firm filed a lawsuit on behalf of Daniella Mohazab against Dr. George Tyndall and the University of Southern California (U.S.C.)

Today we have amended our lawsuit to reflect that we are now suing on behalf of 24 women who allege that they were also victims of Dr. Tyndall and U.S.C.

In our lawsuit we allege sexual battery, battery, gender violence, sexual harassment, violation of California's Unruh Civil Rights Act, violation of the California Bane Act, sexual harassment in violation of the education code, negligence hiring and retention, negligent supervision, fraudulent misrepresentation, negligent misrepresentation, intentional infliction of emotional distress, and negligent infliction of emotional distress. We are seeking compensatory and punitive damages according to proof at trial.

In our lawsuit some of our clients have decided that their names may be revealed on the complaint. Two of our clients who have given us permission to use their names are here with us today. They are Daniella Mohazab who was our first client to file a complaint and Anika Narayanan whose name has been added to our lawsuit today.

Many of our other clients have chosen to be listed on the lawsuit as Jane Doe. Plaintiffs who allege that they were sexually assaulted or abused have a right to retain their privacy and they are not required to disclose their true legal name in the complaint which is a public document. We support the right of an individual to choose either to be listed as Jane Doe or to provide her true name. Either way she has the right to assert her rights in a lawsuit.

The lawsuit we filed today is 53 pages long. I think it is important to provide some examples of what some of our clients have alleged.

Daniella went in for a standard STD test and to talk about medication. Dr. Tyndall had his laptop and looked up the medications. Tyndall asked Daniella about her race. She responded that she was Filipina. She remembers that Tyndall's office was messy, and there were framed pictures of Tyndall's wife, who was also Filipina. Tyndall wore unprofessional clothing: leather lace up shoes, loose khakis, a button up short sleeve shirt. During the meeting in his office Tyndall told Daniella that she was pretty. He related her to his wife by saying that Filipinas are the "smartest", "most giving" and "gentle" people. He told her that Filipinas are good in bed. He also said Filipinas are devoted to their partners and that they don't sleep with many people in their life time. He asked her intimate sexual details about her life and related her answers to being Filipina, saying, "I guess that's because you're mixed," with a creepy smile.

In the exam room, he told her the previous doctor's (Dr. Pinanong) STD tests were conducted incorrectly and inaccurately. He asked her to undress from the bottom down and he stood there watching while she did so and smiled. He then instructed her to lie on the examination table, which she did. He put her feet in the stirrups for the STD examination and gave her some paper to put on the top of her upper legs.

Then, without a glove, Defendant Tyndall put his two fingers in her vagina and felt around. He said, "I think we better use some lube" with a snide look on his face as he opened a packet of lube that he retrieved from the cabinet on the side of the room next to the patient chair. He felt around her vagina by moving his fingers around inside for a few minutes.

Tyndall instructed another one of our clients, a.k.a., Jane Doe to completely undress. She tried to cover herself as best she could with a small cover given to her, but he told her to stand up. He proceeded to put both his hands on her breasts, squeeze them and said, "wow you have such perky little breasts for being such a tall girl. It must be because you're a fit soccer player."

Defendant also told another Jane Doe to lay on the examination table and to open her legs. He then proceeded to take pictures of Doe's vagina. He thereafter digitally penetrated her vagina and then put his other hand under her and proceeded to penetrate her anus at the same time. He said, "We have to check inside."

After removing his finger from her anus, he inserted a speculum and took more pictures of her vagina. He explained that he was taking pictures to see if she had any STD's and told her to return for a follow up as he would have pictures at that time. She returned and she showed her the photos saying he did not find anything.

Tyndall, with a female nurse present but who was turned away, digitally penetrated another Jane Doe's vagina, moved his fingers around and in a sexual manner said she had "good pelvic muscles." He also thrust his pelvis towards the table while his fingers were in her vagina.

Another Jane Doe plaintiff went to USC Health Center to see a gynecologist believing she had a cyst. She was given an appointment to see Tyndall. He touched her cyst and asked if it was painful and she replied, "no." He asked if she was sexually active and "do you have painful sex?" He digitally penetrated her and felt around her vagina while commenting that her hymen must still be intact. He finished with the examination and said, "We're done," however he remained in the room. She had no choice but to dress with him in the room. He said, "wow, what's your background?" She replied: "I'm Latina." Tyndall asked, "Mexican?" He said, "You have such pretty eyes and big beautiful eyelashes. You know you remind me of either a girl I used to date or a girl from college. She had big pretty eyelashes. You look so much like her that I have to take a photo of you so I can show to my other friend." She said "no," she did not want him to take her picture, but he insisted and said he had a camera. She felt forced to agree and he pulled out a Polaroid camera from the box and began to take pictures of her.

Tyndall inserted a speculum in another Jane Doe's vagina and she squirmed. Tyndall asked, "What's wrong?" Doe answered that it was uncomfortable. He replied, "well, you're pretty tight down there. Your boyfriend must like it."

Another Jane Doe plaintiff, of mixed race, went in for a gynecological exam. Tyndall inserted several fingers at once into her vagina, commenting she was "very lucky because you look white but have the tight vagina muscle tone of an Asian girl." He commented about how "passionate" and "sexy Vietnamese women" were and "Vietnamese women could be so good at sex" because of their

"fireiness" and "bodies." He told Doe that when she started to have sex she would be "great." There was a female nurse present during the exam with her back to Jane Doe during the exam. When she left Tyndall took photos of her vulva for her "medical record."

Another Jane Doe came in due to heavy bleeding around her period and spoke to Tyndall and a chaperone who was also in the room for pre-examination. When they left the room, she took out her tampon, wrapped it in tissue and placed it in a small trash can in the room. When Tyndall and the chaperone returned, she sat on the table and laid back and put her feet into the stirrups. She looked at the chaperone who stood with her arms crossed over her chest. Tyndall told the Jane to open "wider... wider... okay wider... wider...," while she was grimacing from discomfort. He inserted multiple fingers into her vagina and told her to relax and that her vagina was very tight and that her hymen was "still halfway intact" and "super elastic." He smiled eerily and looked directly at her. He pulled out his hand and a small splatter of blood spilled onto the floor. Tyndall stepped in the blood and tracked it around the room with the bottom of his shoe. He told her the blood was likely stress related but to come back for a follow up. Before leaving, she saw Tyndall had retrieved her tampon from the trash can and placed it on the desk.

Our 24 clients are very courageous to have decided to join this lawsuit and reveal what are in some cases very intimate and traumatic details of what they allege that they suffered in their interactions with Dr. Tyndall, their gynecologist, at U.S.C.

We look forward to asserting, protecting, and vindicating their rights in a court of law. It is time for justice for those who trusted Dr. Tyndall and U.S.C. and whose trust was completely betrayed.

Gloria Allred  
Attorney at Law  
Representing 24 alleged victims of Dr. George Tyndall  
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