



1 **Additional Complaint Details:**

2 Erin Bennett is currently employed as graduate student reader with the University of California  
3 Berkeley ("UCB"). She has been employed in this capacity since August 1, 2015. As a graduate student  
4 reader, Ms. Bennett was responsible for grading and providing feedback on undergraduate student  
5 assignments. Ms. Bennett is a member of the United Auto Workers Union.

6 In addition to her employment, Ms. Bennett has been a PhD student in the Comparative Literature  
7 department at UCB since her enrollment on August 26, 2014.

8 She is currently on medical leave from her academic studies due to having been subjected to sexual  
9 harassment by a UCB assistant Dr., as described below. Ms. Bennett would like to re-enroll in her  
10 graduate program for the Fall 2016 semester, if her complaint is satisfactorily resolved.

11 Since the Fall semester of 2014, Ms. Bennett has been subjected to sexual harassment, gender-based  
12 discrimination and an oppressive, hostile, intimidating and offensive work environment. Since the  
13 inception of her graduate studies, Ms. Bennett began to experience harassment and mistreatment from  
14 UCB assistant Dr. Blake Wentworth. Dr. Wentworth is an assistant professor in the South and  
15 Southeast Asian Studies Department, which is proximate in location to the Comparative Literature  
16 department, where Ms. Bennett is employed. Dr. Wentworth's conduct began by subjecting Ms.  
17 Bennett to conversations of a sexual nature and sexual innuendos, which then escalated to inappropriate  
18 touching.

19 Dr. Wentworth encouraged Ms. Bennett to join his independent study class, a one-on-one intensive  
20 course, for the Tamil language, in which Dr. Wentworth is considered an expert. In this class they  
21 would devote two hours per week translating Tamil literature in order to improve Ms. Bennett's Tamil  
22 proficiency. Since Tamil was one of the three languages Ms. Bennett had chosen for her graduate  
23 school emphasis, and for which she received a \$16,000 annual scholarship to study, Ms. Bennett  
24 agreed.

25 On September 18, 2014, a mere number of weeks into Ms. Bennett's first semester as a graduate student  
26 at UCB, they met and Wentworth offered to create an independent study course for Ms. Bennett. There  
27 was no syllabus or plan, which was required in such a class. Rather, during the four subsequent  
28 independent study meetings Dr. Wentworth conducted over the next month, he primarily talked to Ms.  
Bennett about his personal life, specifically about his failing marriage. In this session, he compared  
learning Tamil to being "better than sex."

On a separate occasion, on October 9, 2014, Dr. Wentworth placed his hand on Ms. Bennett's hand  
when she was petting his dog, which he then had in his office, and attempted to hold her gaze in silence.

In another incident, after Ms. Bennett expressed to Dr. Wentworth that she was interested in  
feminist Tamil literature, Dr. Wentworth translated into English a passage from a book describing, in  
detail, a woman being raped by her husband. He again tried to hold her gaze while doing so. Although  
Dr. Wentworth warned her that it would be explicit, Ms. Bennett felt disgusted and uncomfortable.

1 Ms. Bennett last attended Dr. Wentworth's independent study class on October 23, 2014, as she could  
2 no longer endure the extremely uncomfortable conversations and conduct of Dr. Wentworth.

3 During their last meeting on or about October 23, 2014, Dr. Wentworth also twice approached Ms.  
4 Bennett when she was in his office, placing his hand on her shoulders, without consent, and leaned in  
5 towards her. At this time, he said that he would be able to help her with her transfer application from  
6 Comparative Literature Studies to South and Southeast Asian Studies, the department where Dr.  
7 Wentworth taught. He also said they could translate Tamil literature that had never been translated  
8 before and publish it together, and that he could introduce her to female Tamil authors in India.

9 During one of his meetings, Dr. Wentworth told her that he needed to keep the office door open "for  
10 you and my own protection," but after checking with a graduate student who was working at a nearby  
11 office, he closed the office door. However, he re-opened the door when Ms. Bennett looked visibly  
12 upset. There were also an instance where Dr. Wentworth went closely behind Ms. Bennett while his  
13 arm went across her shoulder to point something on the book they were translating According to Ms.  
14 Bennett, he could have easily pointed out what was on the book while they were sitting adjacent to  
15 each other. In translating a passage in a Tamil book, he alluded to things he would do if Ms. Bennett  
16 were his wife, which was out of context because the Tamil book made no mention of this. Unsolicited,  
17 Dr. Wentworth also gave Ms. Bennett his personal email, phone and AOL instant messenger  
18 information.

19 These acts made Ms. Bennett feel harassed and unsafe being in Dr. Wentworth's class and office. She  
20 felt he was testing her boundaries, to see what behaviors she would tolerate.

21 On November 7, 2014, Ms. Bennett emailed Dr. Wentworth to inform him she was dropping his class.  
22 He called her his "poor little lamb", during their last meeting, further contributing to the hostile work  
23 and academic environment he created.

24 At first, Ms. Bennett did not report Dr. Wentworth's conduct to the University because she felt  
25 ashamed, afraid of retaliation, and would negatively impact her success in graduate school as well as  
26 her career. However, one of Ms. Bennett's professors began to support her in filing a formal complaint  
27 with the university. On March 16, 2015, Ms. Bennett made a formal complaint about Dr. Wentworth's  
28 harassment to the Office for Prevention of Harassment and Discrimination ("OPHD"). On March 16,  
2015 Ms. Bennett met with Andrea LaCampagne, OPHD Complaint Resolution Officer, and shared  
her concerns Wentworth. Ms. Bennett however was not informed that she could have an attorney or  
union representative present at this meeting, or that certain time limits applied to filing a complaint  
with the DFEH.

On March 18, 2015, Ms. Bennett attempted to obtain a No Contact Directive ("NCD") from OPHD to  
prevent Dr. Wentworth from being within 100 yards of her, but the office would not agree to her terms.  
During this period, Dr. Wentworth approached Ms. Bennett from behind in Dwinelle Hall, causing Ms.  
Bennett to leave the building, fearing for her safety. Dr. Wentworth alone signed the NCD on June 6,  
2015. Ms. Bennett did not agree, as the NCD did not mandate Dr. Wentworth to maintain a specific  
distance from Ms. Bennett.

1 On October 8, 2015, approximately eight (8) months after Ms. Bennett file her complaint, OPHD issued  
2 a report and found that Dr. Wentworth's conduct was merely "unprofessional and exhibited poor  
3 personal boundaries", but did not violate UCB's Sexual Harassment and Sexual Violence Policy,  
4 ("Policy") because it was not sufficiently severe or pervasive to constitute sexual harassment based on  
5 a preponderance of the evidence.

6 OPHD's negative finding had a strong impact on Ms. Bennet's physical safety as a UCB employee,  
7 and on her general wellbeing. The last day Ms. Bennett attended her graduate studies classes was  
8 October 13, 2015.

9 On November 11, 2015, Ms. Bennett requested medical leave from her studies due to these incidents,  
10 and is afraid to return to UCB because of Wentworth's persistent harassment. The events have caused  
11 her great anxiety and depression. Her medical leave request was approved on November 17, 2015.

12 Dr. Wentworth has not been disciplined for his behavior towards Ms. Bennett, which complainants  
13 believe amounts to sexual harassment and gender based discrimination, giving rise to the instant  
14 complaint.  
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1 VERIFICATION

2 I, R. Michael Flynn, am the Attorney(s) for Complainant in the above-entitled complaint. I have read  
3 the foregoing complaint and know the contents thereof. The same is true of my own knowledge,  
4 except as to those matters which are therein alleged on information and belief, and as to those  
5 matters, I believe it to be true. On April 11, 2016, I declare under penalty of perjury under the laws of  
6 the State of California that the foregoing is true and correct.

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Oakland, CA  
/s/  
*R. Michael Flynn*

AS SUBMITTED