

1 **DECLARATION OF ZOE KATZ**

2 I, Zoe Katz, declare:

3 I am a 22-year-old student athlete at the University of Southern California ("USC"). I have
4 personal and first-hand knowledge of the facts set forth in this Declaration, unless otherwise stated, and,
5 if called as a witness, I could and would testify competently to those facts.

6 1. I make this declaration in support of Matthew Boormeester's Motion for Stay of USC's
7 expulsion decision. I have read the Petition filed herein and am familiar with its contents.

8 2. As of January 21, 2017 I had been dating Matthew Boormeester for more than a year and we
9 are still in a dating relationship. I was the captain of the USC women's tennis team and I am nationally
10 ranked singles tennis player.

11 3. Although USC refers to me as the "Reporting Party" in their Title IX process, I never made a
12 report to USC about Matthew Boormeester and I repeatedly told USC Title IX personnel, including Title
13 IX Coordinator Gretchen Dahlinger Means and Title IX Investigator Lauren Elan Helsper that Matthew
14 Boormeester was falsely accused of conduct involving me.

15 4. I made it very clear to USC that I have never been abused, assaulted or otherwise mistreated by
16 Matthew Boormeester; not on January 21, 2017 and not ever. Nothing happened that warranted an
17 investigation, much less the unfair, biased and drawn out process that we were forced to endure without
18 speaking publicly.

19 5. On July 30, 2017, after the USC Title IX process was finally completed, I issued a public
20 statement about the mistreatment that I had personally endured during USC's Title IX investigation
21 process, specifically from Title IX Coordinator Gretchen Dahlinger Means and Title IX Investigator
22 Lauren Elan Helsper. Attached to this declaration is a true and correct copy of the public statement that
23 I issued. The representations I made in my public statement are true and correct.

24 6. During the Title IX process I felt so misled, harassed, threatened and discriminated against by
25 USC's Title IX personnel, specifically Gretchen Dahlinger Means and Lauren Elan Helsper, that I had to
26 retain my own attorney to protect myself and to try to get UCS's Title IX office to listen to me.

27 7. Most alarming, I saw that statements of witnesses, including my own statements to Gretchen
28 Dahlinger Means and Laruen Elan Helsper, were misrepresented, misquoted and taken out of context in

1 order to support Ms. Means' and Ms. Helsper's own personal opinions about what they think happened.

2 8. Looking back in hindsight, I now see that USC's Title IX Coordinator Gretchen Dahlinger
3 Means and Title IX Investigator Lauren Elan Helsper must so strongly presume reports of misconduct to
4 be true, especially allegations against very successful male scholar-athletes such as Matthew
5 Boormeester, that "the ends justifies the means" and the accused student will be judged guilty even with
6 no evidentiary support and against the uncontradicted testimony of the supposed "victim."

7 9. I ask the court to stay USC's entire action and decision against Matthew Boormeester,
8 including the expulsion

9 I declare under the penalty of perjury in the State of California that the foregoing is true and correct.

10 Sign at San Diego, California, and on date set forth below.

11
12 Date: August 16, 2017


Zoe Katz

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FOR IMMEDIATE RELEASE
July 30, 2017

Zoe Katz Statement about the USC Title IX Investigation of Matt Boermeester

Los Angeles, CA - I really do not know how to make a statement like this but I am determined to try to have my voice heard.

I am Zoe Katz and I am a 22 year old student athlete at USC (captain of the women's tennis team), nationally ranked singles player and have been dating Matt Boermeester for well over a year. Matt, the Trojan kicker who helped win the Rose Bowl, has been falsely accused of conduct involving me.

The fact that I have to publicly state this truth is because of how both Matt and I have been treated by USC's Title IX office.

I am speaking up now because this horrible and unjust six-month process has finally concluded. I will tell you that I am afraid of USC's Title IX office. I hope that my comments will not cause USC's Title IX office to further retaliate against me in any way.

I want to be very clear that I have never been abused, assaulted or otherwise mistreated by Matt. He is an incredible person, and I am and have been 100% behind him. Nothing happened that warranted an investigation, much less the unfair, biased and drawn out process that we have been forced to endure quietly.

Terrible and untrue things have been said about Matt by people who don't even know him, including apparently the third party who contacted Title IX, and these bizarre assertions have been treated as fact in this investigation. Words, including mine, have been incompetently or intentionally misrepresented, misquoted and taken out of context, which should not be that surprising since no statements were recorded or verified.

The first time I was mandated to come in and be interviewed by the Title IX office, I was told that I must be afraid of Matt, which I definitely was not and am not. When I told the truth about Matt, in repeated interrogations, I was stereotyped and was told I must be a "battered" woman, and that made me feel demeaned and absurdly profiled. I understand that domestic violence is a terrible problem, but in no way does that apply to Matt and me.

On one occasion I was told to come in to view a videotape - which I was happy to do - and then nothing was shown to me. It ended up being just another interrogation. I feel I was misled, harassed, threatened and discriminated against by the Title IX office to such an extent that I had to retain my own attorney during the process to protect myself and to try to get them to listen to me. The Title IX office's response was dismissive and demeaning, "We are sorry you feel that way."

Looking back, Matt never had a chance. Before he was even interviewed by the Title IX investigator, he was suspended from the University. He was not permitted to go to class or be on campus (he had two classes left

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to graduate and he was not allowed to take them elsewhere), he was not permitted to rehabilitate his knee with our trainers (he had surgery by USC doctors two weeks before), he was publicly removed from the football team and all of its activities, he was forbidden to contact me because of an unfounded concern about my safety (it was a one-way no contact order, and every one of my repeated attempts and those of my own attorney to have it lifted it were denied), and he was told he could not talk about the matter or he would potentially face another alleged violation of the policy.

Others in the University community were told they could not talk to Matt or they could be investigated too. He was completely cut off from his school and the team he had kicked to victory in the Rose Bowl. I was told that if I contacted Matt, "things would not go well for him." I was also told that I could be charged and investigated if I spoke to anyone who they decided to call in as possible "witnesses."

Matt and I love USC. We have given our best on the tennis court and on the football field. I do not understand how this situation could have been allowed to happen, especially at USC.

The USC I know and really love upholds values like family, trust and excellence. Facts and fairness are supposed to govern Title IX and not agendas, intimidation and falsehoods. I am so sad that a rogue group like the Title IX office can bring down this amazing school. On behalf of all Trojans, I have to speak up. But more importantly, I am speaking up for myself and for Matt. I will not permit anyone to portray me as a victim, I am not. Nor will I stand by silently and watch a good person like Matt be railroaded by a rigged system.

Matt Boormeester did nothing improper against me, ever. I would not stand for it. Nor will I stand for watching him be maligned and lied about, and I implore the USC community to stand together to stop this from happening to Matt or anyone else.

I know we are not alone.

<https://scepticsociety.com/2017/07/23/a-new-class-of-victims-abuse-of-title-ix-at-the-university-of-southern-california/>

<http://reason.com/blog/2016/08/02/usc-title-ix-official-campus-rape>

<http://helpsaveoursons.com/uscs-eight-title-ix-lawsuits-in-superior-court-filed-by-males/>

If you want any further information, please contact my attorney Kerry Steigerwalt.

08/22/2017