

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,
Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,
Defendant.

Case No. _____

COMPLAINT

CERTIFICATION OF RELATED CASES

Pursuant to L.R. 40.1(g)(1), the above-titled case is related to *Alexander Kestenbaum, et al. v. President and Fellows of Harvard College*, D. Mass. Case No. 1:24-cv-10092-RGS (“*Kestenbaum*”) and *The Louis D. Brandeis Center for Human Rights, et al., v. President and Fellows of Harvard College*, D. Mass. Case No. 1:24-cv-11354-RGS (“*Brandeis*”) for the reasons set forth and stated as follows:

All actions share a common Defendant, Harvard. Both the *Kestenbaum* and *Brandeis* cases alleged that Harvard violated Title VI of the Civil Rights Act of 1964 through intentional discrimination and deliberate indifference to a hostile environment on campus. This action alleges intentional discrimination and deliberate indifference to a hostile environment more broadly at Harvard and encompasses some of the facts and occurrences alleged in *Kestenbaum* and *Brandeis*. As such, the facts establishing the acts of alleged discrimination and deliberate indifference in the *Kestenbaum* and *Brandeis* cases constitute a subset of the facts which give rise to this case.

Respectfully submitted,

March 20, 2026

HARMEET K. DHILLON
Assistant Attorney General

JESUS A. OSETE
Principal Deputy Assistant Attorney General

JEFFREY MORRISON (MO No. 44401)
Deputy Assistant Attorney General

/s/ Jeffrey Morrison

JOHN P. MERTENS (UT No. 14522)
Acting Chief, Educational Opportunities Section

DANIEL S. FLICKINGER (AL No. 9539N77F)
Senior Counsel

ADAM F. GRIFFIN (NC No. 55075)
Trial Attorney

JOSHUA R. ZUCKERMAN (DC No. 1724555)
Trial Attorney

Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.

Washington, D.C. 20530
Telephone: (202) 532-3893

Email: john.mertens@usdoj.gov

ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA