# UNITED STATES DISTRICT COURT
# DISTRICT OF MINNESOTA

Haishan Yang
vs.

Plaintiff(s),

Case No. 25-cv-89-JMB/SGE
(To be assigned by Clerk of District Court)

DEMAND FOR JURY TRIAL
YES X NO ___

University of Minnesota

Defendant(s).

(Enter the full name(s) of ALL plaintiffs and defendants in this lawsuit. Please attach additional sheets if necessary.)

## COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

   a. Plaintiff

| | |
|---|---|
| Name | Haishan Yang |
| Street Address | 2136 Ford Parkway #5244 |
| County, City | Saint Paul |
| State & Zip Code | MN 55116 |
| Telephone Number | 4359321198 |



2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name University of Minnesota

Street Address 360 McNamara Alumni Center, 200 Oak Street S.E.

County, City Minneapolis

State & Zip Code MN 55455

b. Defendant No. 2

Name _____

Street Address _____

County, City _____

State & Zip Code _____

c. Defendant No. 3

Name _____

Street Address _____

County, City _____

State & Zip Code _____

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

**Check here if additional sheets of paper are attached: ☐**

**Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.d., 2.e., etc.)**

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of

the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than $75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? *(check all that apply)*

X Federal Question ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

Fourteenth Amendment to the United States Constitution – Procedural Due Process Violation.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

| | |
|---|---|
| Plaintiff Name: | State of Citizenship: |
| Defendant No. 1: | State of Citizenship: |
| Defendant No. 2: | State of Citizenship: |

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**
**Check here if additional sheets of paper are attached.** ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

Defendant(s) reside in Minnesota X Facts alleged below primarily occurred in Minnesota

Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

1. On August 5, 2024, Plaintiff Haishan Yang, a third-year Ph.D. candidate at the University of Minnesota (UMN), took the preliminary exam required for his doctoral candidacy in the Health Services Research, Policy & Administration Ph.D. program.

2. In late August 2024, Plaintiff was informed by faculty members that they believed he had used ChatGPT to complete his exam. Based on this belief, the faculty recommended his expulsion.

3. On November 26, 2024, following a hearing conducted by the Campus Committee on Student Behavior (CCSB), Plaintiff was formally notified of his expulsion. The expulsion was later upheld on January 7, 2025, by Appellate Officer Scott Lanyon.

4. During the CCSB hearing, UMN relied on altered ChatGPT evidence submitted by a faculty member Hannah Neprash, which included at least ten instances of alterations such as: a. Reduction of bold formatting in key sections of the output. b. Omission of critical content, such as summary paragraphs and headers.

5. Independent forensic analysis confirmed that the alterations to the ChatGPT evidence were deliberate and not caused by technical errors, such as copy-pasting. This raised significant doubts about the credibility and fairness of the evidence.

6. Plaintiff attempted to replicate the ChatGPT output using the same available tool but was unable to reproduce the evidence presented by UMN, suggesting selective generation or manual manipulation of the outputs.

7. During the CCSB hearing, Plaintiff was provided with the original ChatGPT log moments before the conclusion of cross-examination. This timing left Plaintiff with insufficient opportunity to review or rebut the evidence effectively.

8. UMN claimed that Plaintiff's exam responses were "unusually long" compared to other students but refused to provide access to the underlying data or prior student submissions to verify this claim. This lack of transparency directly violated Plaintiff's right to due process.

9. UMN accused the Plaintiff of having an AI score of 89% in GPTZero for Question 4 of the exam. However, the Plaintiff verified it himself and found that the score was only between 40% and 50%.

10. The chair of the CCSB hearing frequently interrupted Plaintiff's advocate while allowing faculty members significant leeway in their testimonies, creating an appearance of bias during the proceedings.

11. The procedural flaws, reliance on altered evidence, and denial of adequate notice and opportunity to respond collectively violated Plaintiff's due process rights under the Fourteenth Amendment.

12. As a result of the expulsion, Plaintiff faced the following harms: a. Loss of visa status, as the expulsion jeopardized Plaintiff's ability to remain in the United States as an international student. b. Reputational harm within the University of Minnesota and broader academic community. c. Emotional distress caused by the disciplinary process, including anxiety, uncertainty, and professional setbacks. d. Disruption to Plaintiff's academic and career trajectory, including the inability to participate in professional opportunities such as the ASSA 2025 Annual Meeting.

**Attach additional sheets of paper as necessary.**
**Check here if additional sheets of paper are attached: □**
**Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.**

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

1. Declaratory Judgment

○ A declaration that UMN violated Plaintiff's due process rights under the Fourteenth Amendment.

2. Injunctive Relief

○ Reinstate Plaintiff's enrollment and academic standing.

○ Expunge all disciplinary records related to this case.

○ Allow Plaintiff to complete his Ph.D. program without prejudice.

3. Compensatory Damages

○ $150,000 for reputational harm.

○ $100,000 for emotional distress.

○ $125,000 for lost academic and professional opportunities, including canceled research collaborations and presentations.

4. Punitive Damages

○ $200,000 to deter future procedural violations and uphold fairness in disciplinary proceedings.

5. Costs and Attorneys' Fees

○ Reimbursement of all legal expenses incurred by Plaintiff as permitted by law.

6. Additional Relief

○ Any other relief this Court deems fair, just, and proper, including measures to restore Plaintiff's reputation within the academic community.

Total Financial Relief Requested: $575,000 plus costs and attorneys' fees.

For any other relief the court feels is fair and equitable.

Plaintiff demands a trial by jury on issues triable to a jury.

Date: 01/08/2025

Signature of Plaintiff 

Mailing Address 2136 Ford Parkway #5244
Saint Paul, MN 55116
United States

Telephone Number 4359321198

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.