



THE EQUAL PROTECTION PROJECT
A Project of the Legal Insurrection Foundation
18 MAPLE AVE. #280
BARRINGTON, RI 02806
www.EqualProtect.org

December 22, 2025

BY EMAIL

Hon. Harmeet K. Dhillon, Esq.
Assistant Attorney General for Civil Rights
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington DC 20530

**Re: Civil Rights Complaint Against Seven Illinois Public Universities Regarding
At Least 77 Discriminatory Scholarships and Programs**

Dear Assistant Attorney General Dhillon:

The Equal Protection Project of the Legal Insurrection Foundation is a non-profit entity that, among other things, seeks to ensure equal protection under the law and opposes unlawful discrimination in any form.

We write to request that the Department of Justice open a prompt investigation into systematic discrimination within the Illinois public university system involving at least seventy-seven (77) scholarships and programs across seven institutions, including the flagship University of Illinois Urbana-Champaign. The open discrimination at state higher educational institutions based on race, color, or national origin in violation of Title VI, and on the basis of sex in violation of Title IX, requires federal action.

The scholarships and programs at each of seven public universities are documented in exhibits appended to this complaint as Exhibits A–G, respectively. Each exhibit lists the number

of discriminatory programs or scholarships identified at the institution, along with screenshots, links, and archived links.

- Exhibit A. University of Illinois – Urbana Champaign (38) (page 10)
- Exhibit B. Illinois State University (4) (page 29)
- Exhibit C. University of Illinois Springfield (13) (page 32)
- Exhibit D. Eastern Illinois University (1) (page 34)
- Exhibit E. Chicago State University (4) (page 35)
- Exhibit F. University of Illinois Chicago (1) (page 37)
- Exhibit G. Western Illinois University (16) (page 38)

Because these are public institutions, these discriminatory scholarships and programs also violate the Equal Protection Clause of the Fourteenth Amendment.

I. SUMMARY

The evidence supporting this complaint and reflecting the pattern of discrimination across public universities in Illinois is set forth in the Exhibits and is briefly summarized below.

A. University of Illinois – Urbana Champaign (UIUC) (38)

UIUC offers thirty-eight (38) university-administered scholarships and fellowships that discriminate based on race, ethnicity, national origin, and sex.¹ As detailed in **Exhibit A**, these programs include dozens of awards limited to or preferring applicants identified as “minority,” African American, Latino/Latina, or of specific national or ethnic descent (including Czech, Lithuanian, Chinese, Japanese, and other ancestries), as well as scholarships reserved exclusively for male or female students. Several awards combine both race- and sex-based eligibility criteria, such as scholarships limited to “male minority” or “female minority” students. Collectively, these programs span multiple departments and academic disciplines and represent a systematic pattern of race- and sex-based restrictions embedded within UIUC’s academic infrastructure.

B. Illinois State University (ISU) (4)

Illinois State University administers four (4) scholarships that explicitly condition eligibility on race, ethnicity, and sex. As described in **Exhibit B**, these include awards limited to “female students of color,” scholarships tied to “Latinx” identity through alumni-network affiliation, and a general “Diversity Scholarship” expressly designed to support students from “traditionally underrepresented populations.” ISU also offers at least one academic-unit scholarship that gives preference to female students. These programs are promoted as part of the

¹ In August 2024, EPP filed a complaint with the Department of Education regarding 42 discriminatory scholarships and programs at UIUC, which is pending without any action so far. See <https://equalprotect.org/wp-content/uploads/2024/08/OCR-Complaint-Equal-Protection-Project-University-of-Illinois-Urbana-Champaign.pdf> This DOJ complaint addresses only discriminatory scholarships and programs that are currently active. See Exhibit A.

university's commitment to diversity and representation but operate through exclusions based on protected characteristics.

C. University of Illinois Springfield (UIS) (13)

The University of Illinois Springfield maintains a coordinated set of scholarships administered through its Women and Gender Studies program that collectively give preference to female students. As outlined in **Exhibit C**, this group of thirteen (13) named scholarships is awarded through the Office of Financial Assistance and is limited by sex, with no individualized, sex-neutral eligibility framework. Together, these awards function as a consolidated scholarship regime favoring one sex across multiple memorial and organizational funds.

D. Eastern Illinois University (EIU) (1)

Eastern Illinois University offers at least one scholarship that conditions eligibility on protected characteristics related to race. As shown in **Exhibit D**, the Dr. William V. Weber Study Abroad Scholarship gives preference to students identified as members of "traditionally underrepresented groups," explicitly including racial minorities. The program applies categorical preferences rather than neutral or individualized selection criteria.

E. Chicago State University (CSU) (4)

Chicago State University administers multiple programs and scholarships that restrict participation based on race and sex. As detailed in **Exhibit E**, these include scholarships limited to "minority students," a university-supported African American Male Resource Center expressly designed for Black men, and the "Call Me MISTER" program, which is limited to African American and Latinx male participants pursuing teaching careers. These offerings combine race-exclusive and sex-exclusive eligibility requirements and extend beyond scholarships to encompass institutional programs and resource centers.

F. University of Illinois Chicago (UIC) (1)

The University of Illinois Chicago operates the Urban Health Program, a long-standing university initiative established to recruit and support students from specific racial and ethnic groups. As described in **Exhibit F**, the program limits eligibility to applicants identified as African American, Latino, or Native American and provides academic and professional support tied to those classifications. The program is housed within the university and is directly connected to graduate and professional health-career pathways.

G. Western Illinois University (WIU) (16)

In February 2024, the Equal Protection Project challenged sixteen scholarships at Western Illinois University ("WIU") with the U.S. Department of Education Office for Civil Rights (OCR); that matter remains pending without action taken. As documented in **Exhibit G**, since that filing WIU has moved its scholarship listings behind a login requirement, limiting

public access and preventing verification of whether the challenged scholarships remain active. See https://wiu.academicworks.com/users/sign_in [<https://archive.is/wip/meGD2>] (accessed December 16, 2025). We therefore request that, as part of this investigation, the Department of Justice act on the previously filed OCR complaint and subpoena relevant records from WIU.

II. LEGAL DISCUSSION – THE SCHOLARSHIPS AND PROGRAMS VIOLATE THE LAW

The scholarships and programs identified in the Exhibits violate either Title VI, by discriminating on the basis of race, skin color, or national origin; Title IX, by discriminating on the basis of sex; or both.² Furthermore, because these are public Illinois universities, such discrimination also violates the Equal Protection Clause of the Fourteenth Amendment.

Title VI prohibits intentional discrimination on the basis of race, color, or national origin in any “program or activity” that receives federal financial assistance. See 42 U.S.C. § 2000d. The term “program or activity” encompasses “all of the operations ... of a college, university, or other postsecondary institution, or a public system of higher education.” See 42 U.S.C. § 2000d-4a(2)(A). As noted in *Rowles v. Curators of the University of Missouri*, 983 F.3d 345, 355 (8th Cir. 2020), “Title VI prohibits discrimination on the basis of race in federally funded programs,” and therefore applies to universities receiving federal financial assistance. Because these Illinois public universities receive and administer federal funds through numerous agencies, including the DOJ,³ and are public institutions, they are subject to Title VI.

² Title II of the Civil Rights Act of 1964 makes it unlawful to discriminate on the basis of race or color in a place of public accommodation, including a public Illinois university. 42 U.S.C. § 2000(a)(a). These scholarships also violate Illinois state law, 775 Ill. Comp. Stat. 5/1-101 et seq. (2024), as well as each school’s own nondiscrimination policies.

³ All of the schools receive federal funding, and all schools except Eastern Illinois and Chicago State also receive DOJ funding. See University of Illinois Urbana Champaign https://www.usaspending.gov/award/ASST_NON_15PBJA22GG04693STOP_015 [<https://archive.is/wip/a5862>] (accessed December 16, 2025); Illinois State University https://www.usaspending.gov/award/ASST_NON_15JCOPS24GG02512PPSE_015 [<https://archive.is/wip/jzU0d>] (accessed December 16, 2025); University of Illinois Springfield https://www.usaspending.gov/award/ASST_NON_15JCOPS23GK02043PPSE_015 [archive.is/wip/gpzT0] (accessed December 16, 2025); (Non-DOJ Funding) Eastern Illinois University <https://www.usaspending.gov/recipient/6b69c8ac-4c56-21bd-4389-6d15ebe06dcf-C/latest> [archive.is/wip/5OIwl] (accessed December 16, 2025); (Non-DOJ Funding) Chicago State University <https://www.usaspending.gov/recipient/a91325ee-4a02-3b30-853d-902553b5be25-C/latest> [archive.is/wip/5dgnD] (accessed December 16, 2025);

Regardless of the Illinois public universities' reasons for offering, promoting, and administering such discriminatory scholarships and programs, they are violating Title VI by doing so. It does not matter if the recipient of federal funding discriminates in order to advance a benign "intention" or "motivation." *Bostock v. Clayton Cnty.*, 590 U.S. 644, 661 (2020) ("Intentionally burning down a neighbor's house is arson, even if the perpetrator's ultimate intention (or motivation) is only to improve the view."); *accord Automobile Workers v. Johnson Controls, Inc.*, 499 U.S. 187, 199 (1991) ("the absence of a malevolent motive does not convert a facially discriminatory policy into a neutral policy with a discriminatory effect" or "alter [its] intentionally discriminatory character"). "Nor does it matter if the recipient discriminates against an individual member of a protected class with the idea that doing so might favor the interests of that class as a whole or otherwise promote equality at the group level." *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181, 289 (2023) (Gorsuch, J., concurring).

As these are public universities, their offering, promoting, and administering these discriminatory scholarships and programs also violates the Equal Protection Clause of the Fourteenth Amendment. In *Students for Fair Admissions*, the Supreme Court declared that "[e]liminating racial discrimination means eliminating all of it The guarantee of equal protection cannot mean one thing when applied to one individual and something else when applied to a person of another color. If both are not accorded the same protection, then it is not equal." *Id.* at 206 (cleaned up). "Distinctions between citizens solely because of their ancestry [including race] are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality." *Id.* at 208. Consequently, "[a]ny exception to the Constitution's demand for equal protection must survive a daunting two-step examination known ... as strict scrutiny." *Id.* at 208 (internal quotation marks and citation omitted). The scholarships and programs at issue here cannot withstand that exacting standard.

Under strict scrutiny, suspect classifications "are constitutional only if they are narrowly tailored measures that further compelling governmental interests." *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 227 (1995). It is the government that bears the burden to prove "that the reasons for any [racial] classification [are] clearly identified and unquestionably legitimate." *Richmond v. J. A. Croson Co.*, 488 U.S. 469, 505 (1989). Here, the Illinois public universities cannot carry this burden.

University of Illinois Chicago

https://www.usaspending.gov/award/ASST_NON_15PNIJ23GG01385DOMR_015
[archive.is/wip/dZLLa] (accessed December 16, 2025);

Western Illinois University

https://www.usaspending.gov/award/ASST_NON_15JCOPS23GK01739PPSE_015
[<https://archive.is/wip/nLTF0>] (accessed December 17, 2025).

A “racial classification, regardless of purported motivation, is presumptively invalid and can be upheld only upon an extraordinary justification.” *Shaw v. Reno*, 509 U.S. 630, 643–44 (1993) (citation omitted). Here, the Illinois public universities cannot demonstrate that restricting scholarships based on race, color, or national origin serves any legitimate governmental purpose, let alone an extraordinary one. Classifications based on immutable characteristics “are so seldom relevant to the achievement of any legitimate state interest” that government policies “grounded in such considerations are deemed to reflect prejudice and antipathy—a view that those in the burdened class are not as worthy or deserving as others.” *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 440 (1985).

The Supreme Court has recognized only two interests compelling enough to justify racial classifications. The first is remedying the effects of past de jure segregation or discrimination in the specific industry and locality at issue, where the government played a role. The second is “avoiding imminent and serious risks to human safety in prisons, such as a race riot.” *Students for Fair Admissions*, 600 U.S. at 207 (citation omitted). Neither applies here.

If the scholarships and programs are intended to achieve racial balance, such an objective has been “repeatedly condemned as illegitimate” and “patently unconstitutional” by the Supreme Court. *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 726, 730 (2007) (“Accepting racial balancing as a compelling state interest would justify the imposition of racial proportionality throughout American society, contrary to our repeated recognition that at the heart of the Constitution’s guarantee of equal protection lies the simple command that the Government must treat citizens as individuals, not as simply components of a racial, religious, sexual, or national class”) (cleaned up, citation omitted).

Further, a policy is not narrowly tailored if it is either overbroad or underinclusive in its use of racial classifications. *J.A. Croson Co.*, 488 U.S. at 506. Indeed, in *Students for Fair Admissions*, the Supreme Court found that similar categories as those used to determine eligibility for the Illinois’ scholarships were “imprecise,” “plainly overbroad,” “arbitrary,” “undefined” and “opaque,” 600 U.S. at 216–17,⁴ and declared that “it is far from evident ... how assigning students to these ... categories and making admissions decisions based on them furthers the educational benefits that the universities claim to pursue.” *Id.* at 216.

For a policy to satisfy narrow tailoring, the government must demonstrate “serious, good faith consideration of workable race-neutral alternatives,” *Grutter v. Bollinger*, 539 U.S. 306, 339 (2003), and show that “no workable race-neutral alternative” could achieve the purported compelling interest. *Fisher v. Univ. of Tex. at Austin*, 570 U.S. 297, 312 (2013). There is no evidence that such alternatives were ever considered here.

Title IX prohibits discrimination on the basis of sex in education. The statute provides: “[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” 20 U.S.C. § 1681(a). Accordingly, a school receiving

⁴ In his concurrence, Justice Thomas criticizes these categories as being “artificial.” *Students for Fair Admissions*, 600 U.S. at 276 (Thomas, J., concurring).

federal funding may not administer scholarships, fellowships, or other forms of financial assistance that impose preferences or restrictions based on sex, except in limited exceptions that are not applicable here. *See* 34 C.F.R. § 106.37(a).

Restrictions that limit eligibility for scholarships based on sex are underinclusive, as they arbitrarily exclude students who would otherwise qualify. While sex-based classifications are subject to “heightened” scrutiny, *Sessions v. Morales-Santana*, 582 U.S. 47, 57 (2017); *United States v. Virginia*, 518 U.S. 515, 532–34 (1996), this standard—though less exacting than the strict scrutiny applied to race-based classifications—still requires an “exceedingly persuasive justification.” *Virginia*, 518 U.S. at 531. To meet this burden, the government must demonstrate “at least that the [challenged] classification serves important governmental objectives and that the discriminatory means employed are substantially related to the achievement of those objectives.” *Id.* at 533. Even if the classifications based on sex or other immutable characteristics were intended to further a compelling interest, discriminatory programs must involve “individualized consideration” and must apply criteria in a “nonmechanical way.” *Grutter*, 539 U.S. at 334.

These scholarships and programs also “signal” race and sex-based preferences. As the Second Circuit recognized in *Ragin v. New York Times Co.*, 923 F.2d 995, 999–1000 (2d Cir. 1991), even subtle messaging can convey discriminatory preferences: “Ordinary readers may reasonably infer a racial message from advertisements that are more subtle than the hypothetical swastika or burning cross, and we read the word ‘preference’ to describe any ad that would discourage an ordinary reader of a particular race from answering it.” This signaling is actionable because the law looks to how an ordinary reader or applicant would perceive the program. *See United States v. Hunter*, 459 F.2d 205, 215–16 (4th Cir. 1972) (advertisements judged by effect on the ordinary reader, regardless of intent).

The Illinois public universities’ race- and sex-based scholarships and programs are presumptively invalid, and since there is no compelling government justification for such invidious discrimination, their offering, promotion, and administration of these programs violates state and federal civil rights statutes and constitutional equal protection guarantees.

Request For Investigation And Enforcement

In *Richmond v. J. A. Croson Co.*, Justice Scalia aptly noted that “discrimination on the basis of race is illegal, immoral, unconstitutional, inherently wrong and destructive of a democratic society.” 488 U.S. at 505 (citation omitted). This is true regardless of which race suffers – discrimination against white applicants is just as unlawful as discrimination against black or other non-white applicants. As Justice Thomas correctly noted in *Students for Fair Admissions*, race-based admissions preferences “fly in the face of our colorblind Constitution and our Nation’s equality ideal” and “are plainly – and boldly – unconstitutional.” 600 U.S. at 287 (Thomas, J., concurring).

Because the discrimination outlined above is presumptively illegal, and since the Illinois public universities cannot show any compelling government justification for it, the fact that they

condition eligibility for multiple scholarships and programs on race, color, national origin and/or sex violates federal civil rights statutes and constitutional equal protection guarantees.

The Department of Justice has the power and obligation to investigate the universities' role in creating, funding, promoting, and administering these scholarships and programs—and, given their number, to determine whether Illinois state-level action is involved—and to impose whatever remedial relief is necessary to hold them accountable for unlawful conduct. This authority includes, if necessary, imposing fines, initiating administrative proceedings to suspend or terminate federal financial assistance, and pursuing judicial proceedings to enforce the rights of the United States under federal law. As the Supreme Court has observed, “[t]he way to stop discrimination ... is to stop discriminating[.]” *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007).

Accordingly, we respectfully request that the Department of Justice’s Civil Rights Division promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from the Illinois public universities’ various scholarships and programs based on discriminatory criteria, and ensure that all ongoing and future scholarships and programming comport with the Constitution and federal civil rights laws.

Respectfully submitted,

/William A. Jacobson/

William A. Jacobson, Esq.
President
Legal Insurrection Foundation
Contact@legalinsurrection.com

/Robert J. Fox/

Robert J. Fox
Attorney
Legal Insurrection Foundation
Robert.Fox@legalinsurrection.com

EXHIBITS A-G

Table of Contents

UNIVERSITY OF ILLINOIS – URBANA CHAMPAIGN (38)	10
ILLINOIS STATE UNIVERSITY (4)	29
UNIVERSITY OF ILLINOIS SPRINGFIELD (UIS) (13)	32
EASTERN ILLINOIS UNIVERSITY (1).....	34
CHICAGO STATE UNIVERSITY (4)	35
UNIVERSITY OF ILLINOIS CHICAGO (1)	37
WESTERN ILLINOIS UNIVERSITY (16)	38

EXHIBIT A

UNIVERSITY OF ILLINOIS – URBANA CHAMPAIGN (38)⁵

A. SCHOLARSHIPS THAT VIOLATE TITLE VI (20)

1. Ash Myron and Jewel Scholarship

Discriminatory Requirement: “to provide support for an African American man...”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=855>

Archived Link: <http://archive.today/1VTAv>

Ash Myron & Jewel Scholarship

College of Education

Awarding Department

College of Education

Applications Used in Evaluation

Free Application for Federal Student Aid	Yes
Scholarship Application	Yes
Scholarship Application Online	yes, after issued invitation to apply

Criteria Used in Awarding

- Preference to provide support for an African American man pursuing a career in elementary and middle school planning a teaching career in an inner city school a the kindergarten through eight grade level.

2. Barksdale Fellowship:

Discriminatory Requirement: “African-Amer Grad”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=911>

Archived Link: <https://archive.is/82vVx>

⁵ https://www.usaspending.gov/award/ASST_NON_15PBJA22GG04693STOP_015
[<https://archive.is/wip/a5862>] (accessed December 16, 2025).

Barksdale Fellowship

College of Liberal Arts and Sciences

Awarding Department

English

Applications Used in Evaluation

Criteria Used in Awarding

- African-Amer Grad pursuing College Teaching Career

3. Campfield, W. Scholarship:

Awarding Department: Accountancy

Discriminatory Requirements: “Preference to minority students.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=2>

Archived Link: <http://archive.today/mCwZN>

Campfield, W. Scholarship

Gies College of Business

Awarding Department

Accountancy

Applications Used in Evaluation

Free Application for Federal Student Aid

Yes

Criteria Used in Awarding

- Preference to minority students
- Accountancy major

4. Capek, O. Sr. & M. Scholarship:

Discriminatory Requirements: “students of Czech descent”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=443>

Archived Link: <http://archive.today/923Vh>

Capek, O. Sr. & M. Scholarship

College of Engineering

Awarding Department

Industrial & Enterprise Systems Engineering

Applications Used in Evaluation

Admissions Application

Yes

Criteria Used in Awarding

- Given equal merit, preference to students of Czech descent
- Academic Merit

5. Cora Kallis Goldstein Scholarship:

Discriminatory Requirement: “African American students from Cook County”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=12311>

Archived Link: <http://archive.today/MGIJh>

Cora Kallis Goldstein Scholarship

Office of Student Financial Aid

Description

The Cora Kallis Goldstein scholarship was created for Illinois Promise students, with a preference given to African American students from Cook County. This scholarship is awarded in accordance with the Illinois Promise Program.

6. Davis AI Leadership Award

Discriminatory Requirement: “Preference given to minority students”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=865>

Archived Link: <http://archive.today/b6gVI>

Davis AI Leadership Award

College of Education

Awarding Department

College of Education

Applications Used in Evaluation

Scholarship Application	Yes
Scholarship Application Online	yes, after issued invitation to apply

Criteria Used in Awarding

- Provides support to a student pursuing a leadership role in a K-12 urban school setting. First preference is given to minority applicants.

7. Dr. Kazys Grinius Scholarship

Discriminatory Requirements: students of Lithuanian descent

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1332>

Archived Link: <http://archive.today/yUjDw>

Dr. Kazys Grinius Scholarship

Office of Student Financial Aid

Awarding Department

University-wide Student Programs

Applications Used in Evaluation

Scholarship Application	Yes
-------------------------	-----

Criteria Used in Awarding

- Preference to students of Lithuanian descent and students who have demonstrated an interest in Lithuanian history, culture, and/or language

8. Earl Neal Scholarship

Discriminatory Requirement: “minority juniors and seniors”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1518>

Archived Link: <http://archive.today/d9NKb>

Earl Neal Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

The scholarship was established in 2005 to honor Earl L. Neal. Neal had a prominent legal career spanning 50 years in the Chicago area. Neal also assisted in the development of many of Chicago's public works projects.

Applications Used in Evaluation

Free Application for Federal Student Aid	Yes
--	-----

Criteria Used in Awarding

GPA:	3.2
• This scholarship is awarded to minority Juniors or Seniors with preference to those in pre-law with a 3.2 GPA or higher. Need is preferred.	

9. Emmons Scholarship

Discriminatory Requirements: “Preference shall be made to students of Latino/Latina descent.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=6023>

Archived Link: <http://archive.today/ChuNL>

Emmons Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

This fund was created to provide scholarships to undergraduate students who are enrolled at the University of Illinois Urbana-Champaign and are sophomores and above. Preference shall be made to students of Latino/Latina descent. Recipient(s) shall have obtained a cumulative GPA of at least a 3.0.

10. Good Norman and Blanche Scholarship:

Discriminatory Requirement: “nontraditional students or racially/ethnically diverse or bilingual students”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=862>

Archived Link: <http://archive.today/kpr0j>

Good Norman and Blanche Scholarship

College of Education

Awarding Department

College of Education

Description

Provides support for a student who pursues elementary, early childhood or special education degree.

Applications Used in Evaluation

Scholarship Application	Yes
Scholarship Application Online	yes, after issued invitation to apply

Criteria Used in Awarding

GPA:	3.0
<ul style="list-style-type: none">• First preference to students pursuing a master's degree who are nontraditional students or racially/ethnically diverse or bilingual students.• Second preference to undergraduate students who are nontraditional students or racially/ ethnically diverse or bilingual students.	

11. Shen, Tony CY & Colleen NHY Fellowship:

Discriminatory Requirement: Student of Chinese descent

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1238>

Archived Link: <http://archive.today/u8pBN>

Shen, Tony CY & Colleen NHY Fellowship

College of Liberal Arts and Sciences

Awarding Department

chemBE

Description

endowment w/ living donors

Applications Used in Evaluation

Criteria Used in Awarding

- post-doctoral fellowship for student of Chinese descent

12. Schmidt RL Memorial Scholarship:

Discriminatory Requirement: “high school minority student”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1231>

Archived Link: <http://archive.today/dqVS6>

Schmidt RL Memorial Scholarship

College of Liberal Arts and Sciences

Awarding Department

Chemistry

Applications Used in Evaluation

Free Application for Federal Student Aid	Yes
Scholarship Application	As of Fall 2011, the Department of Chemistry provides information on how to apply for Chemistry scholarships at http://chemistry.illinois.edu/undergrad/su

Criteria Used in Awarding

GPA:	Yes
<ul style="list-style-type: none">• Preference to Chicago public high school minority student	

13. Hattie Hillard Scholarship

Discriminatory Requirement: “Preference given to minority students.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=762>

Archived Link: <http://archive.today/6QO7t>

Hattie Hillard Scholarship

Awarding Department

Student Affairs Advancement

Applications Used in Evaluation

Free Application for Federal Student Aid	Yes
Scholarship Application	Yes

Criteria Used in Awarding

GPA:	Yes
<ul style="list-style-type: none">• Student should have strong Community Service record• Renew 3.2 gpa• Preference given to minority students	

14. Latino Latina Alumni Scholarship

Discriminatory Requirements: “Preference shall be given to students of Latino or Latina descent.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=6000>

Archived Link: <http://archive.today/ccu8R>

Latino Latina Alumni Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Applications Used in Evaluation

Free Application for Federal Student Aid

True

Criteria Used in Awarding

GPA:

3.0

- Eligible undergraduate students shall be enrolled at the University of Illinois Urbana-Champaign. Recipients shall have a demonstrated financial need and minimum GPA of 3.0 and shall have at least 24 credit hours completed. Preference shall be given to students of Latino or Latina descent, in accordance with and as appropriate under applicable University policies, state and/or federal law.
- Students who file a FAFSA and meet requirements are automatically considered.

15. Lt. Col Michael Anderson Aviation Scholarship for African Americans

Discriminatory Requirement: “African American students”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=12008>

Archived Link: <http://archive.today/iAJ2k>

Lt. Col Michael Anderson Aviation Scholarship for African Americans

Office of Student Financial Aid

Description

Established to provide scholarships to African American students concurrently enrolled at UIUC while taking aviation courses at Parkland Community College.

Applications Used in Evaluation

Free Application for Federal Student Aid

Required

Criteria Used in Awarding

- This scholarship is awarded to African American students who are concurrently enrolled in aviation courses at Parkland Community College. Students who file a FAFSA and meet requirements are automatically considered.

16. Morova, Wenzel Scholarship:

Discriminatory Requirement: “Preference to students of Czech descent.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1443>

Archived Link: <http://archive.today/IGqex>

Morava, Wensel Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

This scholarship was established by will of Wensel Morava.

Applications Used in Evaluation

Free Application for Federal Student Aid	Yes
Scholarship Application	Yes
Scholarship Application Online	https://secure.osfa.illinois.edu/scholarshipsupp/schoadd0.aspx

Criteria Used in Awarding

GPA:	3
<ul style="list-style-type: none">• Preference for this scholarship is given to students of Czech descent.• Preference for this scholarship is given to students from Cook County.• This scholarship requires a signed statement that the student is not a member of a fraternity or a sorority.	

17. OMSA Hope Scholarship:

Discriminatory Requirement: “preference to minority students”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1517>

Archived Link: <http://archive.today/bfjeF>

OMSA Hope Scholarship

Awarding Department

Student Affairs Advancement

Applications Used in Evaluation

Criteria Used in Awarding

GPA:	3.2
<ul style="list-style-type: none">• This scholarship is awarded to undergrad Sophomores, Juniors, and Seniors who participate in OMSA services. Preference is given to a minority student with a GPA of 3.2 or above.• This scholarship is not renewable.	

18. Undocumented Student Mentor Fellowship:

Discriminatory Requirement: “undocumented student(s)”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=12217>

Archived Link: <https://archive.ph/st7Kk>

Undocumented Student Mentor Fellowship

Office of Student Financial Aid

Awarding Department

Office of the Vice Chancellor for Diversity, Equity, and Inclusion

Description

The Undocumented Student Mentor Fellowship is a program designed to provide University of Illinois students with advanced experience in building supportive networks for undocumented prospective and current students. Undocumented Student Mentor Fellows will work 8-10 hours during the academic year (Fall & Spring semesters) to provide direct mentorship to undocumented students, support campus educational efforts, and serve as ambassadors to prospective students who are undocumented.

For more information, visit [Undocumented DACA Programs](#).

19. Tadao Murata Undergraduate Scholarship:

Discriminatory Requirement: “student of Japanese heritage”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=12313>

Archived Link: <http://archive.today/WX8c3>

Tadao Murata Undergraduate Scholarship

Office of Student Financial Aid

Description

The Tadao Murata Undergraduate Scholarship was established to provide scholarships to incoming or current undergraduate students at the University of Illinois at Urbana-Champaign. Awards shall be made on the basis of academic merit. First preference shall be given to students of Japanese heritage.

20. Raymaker Scholarship:

Discriminatory Requirement: “preference to minority students”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=6026>

Archived Link: <http://archive.today/HkgT9>

Raymaker Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

This fund was created to provide scholarships to undergraduate students who are enrolled at the University of Illinois Urbana-Champaign. Scholarship recipients shall be sophomore level and above. Preference shall be made to minority, first generation students who have obtained a cumulative GPA of 3.0 or better.

B. SCHOLARSHIPS THAT VIOLATE BOTH TITLE VI AND TITLE IX (2)

1. Roy Mercer Young Scholarship:

Discriminatory Requirement: "...male minority freshman..."

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1520>

Archived Link: <http://archive.today/tgRNk>

Roy Mercer Young Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Applications Used in Evaluation

Free Application for Federal Student Aid

Yes

Criteria Used in Awarding

GPA:

2.75

- Eligible undergraduate students shall new male minority freshmen, be enrolled at the University of Illinois Urbana-Champaign in the College of Liberal Arts and Sciences. Recipient(s) shall be selected based on financial need, personal and academic accomplishments, outstanding leadership, impact on the quality of life at the University, and demonstrated personal growth and integrity.
- The scholarship may be renewable as long as the applicant meets the academic requirements of a 2.75 or above GPA.
- Students who file a FAFSA and meet requirements are automatically considered.

2. Wilmer Doris James Scholarship:

Discriminatory Requirement: "...first generation female, female, and/or minority students."

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=508>

Archived Link: archive.is/wip/GOgaW

Wilmer Doris James Scholarship

College of Engineering

Awarding Department

Civil and Environmental Engineering

Applications Used in Evaluation

Free Application for Federal Student Aid

Yes

Criteria Used in Awarding

- Preference first to first-generation female, then to female students, and finally to minority students

C. SCHOLARSHIPS THAT VIOLATE TITLE IX (16)

1. Chow Mary Scholarship:

Discriminatory Requirement: “Preference to an outstanding female student.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=493>

Archived link: <http://archive.today/gGHVe>

Chow Mary Scholarship

College of Engineering

Awarding Department

Industrial and Enterprise Systems Engineering

Applications Used in Evaluation

Criteria Used in Awarding

- Preference to an outstanding female student

2. Decyk D A Fellowship:

Discriminatory Requirement: “female graduate student”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=980>

Archived Link: <http://archive.today/GbcY6>

Decyk D A Fellowship

College of Liberal Arts and Sciences

Awarding Department

English

Applications Used in Evaluation

Criteria Used in Awarding

GPA:

Yes

- 1st year female graduate student; good academic

3. E H Schroeder Graduate Award

Discriminatory Requirement: “female graduate students”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=692>

Archived Link: <http://archive.today/IZmPC>

E H Schroeder Graduate Award

College of ACES

Awarding Department

Human and Community Development

Applications Used in Evaluation

Criteria Used in Awarding

ACT:	Yes
<ul style="list-style-type: none">shall be used to provide fellowships to female graduate students enrolled in the Department of Human and Community Development in ACES. Fellowships shall be awarded based upon academic merit and professional promise. If no female grad student in HCD quali	

4. Frances E. Smith Scheidel Scholarships in Literatures, Cultures, and Linguistics Discriminatory Requirement: “Preference shall be given to a female student.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1544>

Archived Link: <http://archive.today/5oKrI>

Frances E. Smith Scheidel Scholarships in Literatures, Cultures, and Linguistics

College of Liberal Arts and Sciences

Awarding Department

School of Literatures, Cultures, and Linguistics

Description

Scholarships awarded to undergraduate students majoring in one of the departments with the School of Literatures, Cultures and Linguistics in the College of Liberal Arts and Sciences at the University of Illinois Urbana-Champaign.

Applications Used in Evaluation

Admissions Application	Yes
Scholarship Application	http://www.slcl.illinois.edu/scheidel.html

Criteria Used in Awarding

- Undergraduate student must be majoring in one of the departments with the School of Literatures, Cultures, and Linguistics
- Whenever possible, preference shall be given to female students and, if candidates can be identified, female students returning to higher education after an interruption due to any circumstance who demonstrate financial need.

5. Johnson Work, Anne A Award:

Discriminatory Requirement: “Female student”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1082>

Archived Link: <http://archive.today/zNPuH>

Johnson Work, Anne A Award

College of Liberal Arts and Sciences

Awarding Department

biochem

Description

endowed fund

Applications Used in Evaluation

Criteria Used in Awarding

GPA:	Yes
• female grad biochem student w/outstanding doctoral thesis	

6. Lindberg Scholarship:

Discriminatory Requirements: “Preference to male students.”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=6025>

Archived Link: <https://archive.ph/apHdv>

Lindberg Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

Available to undergraduate students, enrolled at the University of Illinois Urbana-Champaign, with preference given to male students who have participated in varsity athletics at Lockport Township High School or Romeoville High School, at any time during their high school years. Only applicants who, when they participated, resided in Lockport Township or Village of Romeoville, Illinois, are to be eligible.

7. Mary Sparks Alley Scholarship

Discriminatory Requirement: “Preference for Women”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=126>

Archived link: <http://archive.today/XPO7u>

Mary Sparks Alley Scholarship

Gies College of Business

Awarding Department

College of Business Administration

Applications Used in Evaluation

Scholarship Application	STARS
Scholarship Application Online	https://www3.business.illinois.edu/stars2/

Criteria Used in Awarding

GPA:	Yes
<ul style="list-style-type: none">• Preference for women	

8. Nadia S. Chowdhury Memorial Scholarship:

Discriminatory Requirement: “Preference to female with multicultural heritage”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1509>

Archive link: <http://archive.today/0NySQ>

Nadia S. Chowdhury Memorial Scholarship Fund

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

The scholarship was established in 2004 by Shamsul and Nasrin Chowdhury.

Applications Used in Evaluation

Free Application for Federal Student Aid	Yes
--	-----

Criteria Used in Awarding

GPA:	3.0
<ul style="list-style-type: none">• Preference shall be made to female students with a multicultural heritage, including international students, who are graduates of Naperville, Illinois Central High School who demonstrate academic merit and financial need. Equal consideration shall be given to students enrolled in the College of Liberal Arts and Sciences, in the College of Business majoring in accounting and/or a focus on studies for global economic growth and development, and students enrolled in the College Applied Health Sciences students majoring in the Community Health field.• The scholarship may be renewable for up to three additional years, provided that the scholarship recipient is a full-time student and maintains a cumulative GPA of 3.0 and are making satisfactory progress towards his/her degree.	

9. Oakley Scholarship

Discriminatory Requirement: “Preference for females”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=384>

Archived Link: <http://archive.today/V9WuZ>

Oakley Scholarship

College of Engineering

Awarding Department

Electrical and Computer Engineering

For more information, visit [Oakley Scholarship in ECE](#).

Applications Used in Evaluation

Criteria Used in Awarding

GPA:	Yes
<ul style="list-style-type: none">• Student should be involved in extra-curricular activities• Preference is given to females• Student should be majoring in Electrical and Computer Engineering	

10. Perel, Juanita D. Fellowship:

Discriminatory Requirement: “women chemistry student”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1186>

Archived Link: <http://archive.today/b5Xvx>

Perel, Juanita D Fellowship

College of Liberal Arts and Sciences

Awarding Department

Chemistry

Description

endowed fund

Applications Used in Evaluation

Criteria Used in Awarding

- woman chemistry doctoral student

11. Ramier, Mary E Scholarship

Discriminatory Requirement: “for women”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1205>

Archived Link: <http://archive.today/yQu0Y>

Ramier, Mary E Scholarship

College of Liberal Arts and Sciences

Awarding Department

Women's Studies

Description

endowed fund

Applications Used in Evaluation

Criteria Used in Awarding

- Award used for enhancing education of undergraduate women in terms of research support, conference travel, etc.

12. Sutton Scholarship:

Discriminatory Requirement: female student

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=822>

Archive Link: <http://archive.today/qLKPc>

Sutton Scholarship

College of Media

Awarding Department

Journalism

Applications Used in Evaluation

Criteria Used in Awarding

- To provide scholarships to female print journalism students enrolled in the College of Communications and who have been on the staff of the Daily Illini.

13. Voodry, Earl Scholarship:

Discriminatory Requirement: “Awarded to male students...”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1452>

Archived Link: <http://archive.today/mOxru>

Voodry, Earl Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

This scholarship was established in 1952 from the will of Anna J. Voodry, a resident of Bloomington, IL.

Applications Used in Evaluation

Free Application for Federal Student Aid

Yes

Criteria Used in Awarding

- Awarded to male students with demonstrated financial need.

14. Ware, Manierre B. Scholarship:

Discriminatory Requirement: male undergraduate student

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1453>

Archived Link: <http://archive.today/vZ8f3>

Ware, Manierre B. Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

This scholarship was established in 1940 by Mrs. Charles Ware, in honor of her son, Manierre Barlow Ware Who graduated from the U of I, in 1917.

Applications Used in Evaluation

Free Application for Federal Student Aid

Yes

Criteria Used in Awarding

- Preference is given to a male undergraduate student majoring in agriculture who demonstrates academic merit and financial need.

15. Wilken Phyllis Scholarship:

Discriminatory Requirement: “females”

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=876>

Archived Link: <http://archive.today/VtdoG>

Wilken Phyllis Scholarship

College of Education

Awarding Department

Education Policy, Organization and Leadership

Applications Used in Evaluation

Criteria Used in Awarding

- Scholarships for students meeting following criteria: females pursuing graduate work in educational administration; previous academic performance and indicators of administrative potential. Priority to full time teachers working toward an administrative certificate

16. Women's League Scholarship:

Discriminatory Requirement: "Preference for this scholarship is given to a female."

Link: <https://secure.osfa.illinois.edu/scholarship-database/detail.aspx?id=1501>

Archived Link: <http://archive.today/eXh4p>

Women's League Scholarship

Office of Student Financial Aid

Awarding Department

Office of Student Financial Aid

Description

This scholarship was established in 1942. Students who file a FAFSA and meet requirements are automatically considered. All genders are welcome to apply.

Applications Used in Evaluation

Free Application for Federal Student Aid

Yes

Criteria Used in Awarding

GPA:

3

- The student must be full-time.
- The student must be an undergrad.
- Preference for this scholarship is given to a female.

EXHIBIT B

ILLINOIS STATE UNIVERSITY (4)⁶

A. SCHOLARSHIPS THAT VIOLATE BOTH TITLE VI AND TITLE IX (3)

1. Quizon-Colquitt Family Chemistry Scholarship:

Discriminatory Requirement: “The funding was specific to a female, student of color.”

Link: <https://scholarshipfinder.illinoisstate.edu/scholarships/quizon-colquitt-family-chemistry-scholarship/>

Archived Link: <http://archive.today/Q8I6G>

scholarshipfinder

Quizon-Colquitt Family Chemistry Scholarship

Scholarship Purpose: As a chemistry student earning her master's degree, Desiree received scholarship funding to enable her to attend specialized training in her field. The funding was specific to a female, student of color. Now in a position to pay it forward, Desiree and Andre want to create a scholarship that will offer the same benefit to a female student of color. Thus establishing the Quizon-Colquitt Family Chemistry Scholarship.

Department:

Requirements

Minimum Undergraduate GPA: 3

High School GPA: There is no High School GPA requirement for this scholarship.

Essay: An Essay is required towards applying for this scholarship.

Application Deadline: No deadline has been specified.

Financial Need: This scholarship requires a student to have a Financial Need to be eligible to receive the scholarship. In order to establish "Financial Need", a student must file the Free Application for Federal Student Aid (FAFSA). You can file the FAFSA at <http://www.fafsa.ed.gov/>.

2. Latinx Alumni Network Scholarship:

Discriminatory Requirement: “The mission of LAN is to establish, maintain and promote a network for the empowerment and advancement of Latinx alumni, students, faculty and staff at Illinois State University.”

⁶ https://www.usaspending.gov/award/ASST_NON_15JCOPS24GG02512PPSE_015 [<https://archive.is/wip/jzU0d>] (accessed December 16, 2025).

Link:

<https://alumni.illinoisstate.edu/networks/latinx/scholarships/#:~:text=The%20Latinx%20Alumni%20Network%20,ISULAN%20fund%20this%20%24500%20scholarship>

Archived Link: <https://archive.is/wip/YKt9L>

Latinx Alumni Network Scholarships

Latinx Alumni Network Scholarship

The Latinx Alumni Network (LAN) was established and recognized as an affinity network by the Alumni Association in the fall of 2014. The mission of LAN is to establish, maintain and promote a network for the empowerment and advancement of Latinx alumni, students, faculty and staff at Illinois State University. As a part of LAN's mission, the organization desires to assist students in securing financial support through annual scholarships. Annual donations from alumni and friends of ISULAN fund this \$500 scholarship.

Submit application for 2026-2027 academic year. **Deadline is Wednesday, December 3, 2025.**

Applicants will also need at least two letters of recommendation submitted online. Letters of recommendation are due by Wednesday, December 10, 2025.

3. Diversity Scholarship:

Discriminatory Requirement: "Illinois State University seeks to educate a citizenry that can function in an ethnically and culturally diverse society. This purpose of this fund is to support scholarships for academically talented students from traditionally underrepresented populations."

Link: <https://giving.illinoisstate.edu/fund/diversity-scholarship/#:~:text=ethnically%20and%20culturally%20diverse%20society,for%20academically%20talented%20students%20from>

Archived Link: <https://archive.is/wip/MWIuG>

Diversity Scholarship

Office of the Provost

Financial Aid Office

Illinois State University seeks to educate a citizenry that can function in an ethnically and culturally diverse society. This purpose of this fund is to support scholarships for academically talented students from traditionally underrepresented populations. Applicants must be new beginning freshmen who are U.S. citizens and who have been admitted to the fall term. Scholarship recipients will be selected by the Office of Admissions or a designee. Assets of this endowment are invested in the Illinois State University Endowment Investment Pool. Illinois State University seeks to educate a citizenry that can function in an ethnically and culturally diverse society. This purpose of this fund is to support scholarships for academically talented students from traditionally underrepresented populations. Applicants must be new beginning freshmen who are U.S. citizens and who have been admitted to the fall term. Scholarship recipients will be selected by the Office of Admissions or a designee.

B. SCHOLARSHIPS THAT VIOLATE TITLE IX (1)

1. The School of Information Technology Distinguished Student Scholarship:

Discriminatory Requirement: “Preference given to female students.”

Link: <https://it.illinoisstate.edu/academics/scholarships-awards/>

Archived Link: <http://archive.today/aw75r>

The School of Information Technology Distinguished Student Scholarship

Number Available: 1

About: Alumna Barbara O'Malley donated this scholarship for an incoming or a current student in good standing in the School of Information Technology. Preference is given to female students.

EXHIBIT C

UNIVERSITY OF ILLINOIS SPRINGFIELD (UIS) (13)⁷

A. SCHOLARSHIPS THAT VIOLATE TITLE IX (13)

Women and Gender Studies Scholarships

Description: UIS has over a dozen scholarships awarded by the Office of Financial Assistance that give preference to female students. These include:

Link: <https://www.uis.edu/wgs/scholarships>

Archived Link: <https://archive.is/wip/vwv0M>

1. American Association of University Women
2. Cornelia S. Hodges ZONTA Scholarship
3. Cynthia S. Levin Memorial Scholarship
4. Dr. Pamela E. Peterson Scholarship
5. Evelyn Brandt Thomas Scholarship
6. Grace Brorstrom Oakley Scholarship
7. John E Erickson Memorial Scholarship
8. Anna May Smith Scholarship
9. Lee Humphrey Dodd Memorial Scholarship
10. Mildred E. Roese Memorial Scholarship
11. Rosie Richmond Scholarship
12. Sandra G. Hockenyos Scholarship
13. Suzanna Kay Shiner Scholarship

⁷ https://www.usaspending.gov/award/ASST_NON_15JCOPS23GK02043PPSE_015
[archive.is/wip/gpzT0] (accessed December 16, 2025).

U.S. Dept. of Justice, Civil Rights Division
Civil Rights Complaint Against Seven Illinois Public Universities
December 22, 2025
Page 33 of 38

[Home](#) » [Women and Gender Studies](#) » Scholarships

[Apply for Scholarships](#)

UIS has several scholarships awarded by the Office of Financial Assistance that **give preference to female students**. These include:

- American Association of University Women
- Cornelia S. Hodges ZONTA Scholarship
- Cynthia S. Levin Memorial Scholarship
- Dr. Pamela E. Peterson Scholarship
- Evelyn Brandt Thomas Scholarship
- Grace Brorstrom Oakley Scholarship
- John E Erickson Memorial Scholarship
- Anna May Smith Scholarship
- Lee Humphrey Dodd Memorial Scholarship
- Mildred E. Roesse Memorial Scholarship
- Rosie Richmond Scholarship
- Sandra G. Hockenyos Scholarship
- Suzanna Kay Shiner Scholarship

For information on these scholarships, eligibility requirements, deadlines and application forms, contact the [Office of Financial Assistance](#).

EXHIBIT D

EASTERN ILLINOIS UNIVERSITY (1)⁸

A. SCHOLARSHIPS THAT VIOLATE TITLE VI (1)

1. Dr. William V. Weber Study Abroad Scholarship:

Discriminatory Requirements: Preference will be given to students belonging to traditionally underrepresented groups (e.g. minority, gay, lesbian, bisexual, or transgender students)

Link: <https://eiu.academicworks.com/opportunities/17800>

Archived Link: <http://archive.today/DB5jo>

Dr. William V. Weber Study Abroad Scholarship

For students with financial need who wish to Study Abroad. Preference given to first-generation and underrepresented students.

Full description:

This award is intended to benefit EIU students who are interested in EIU's Study Abroad Program, but are unable to afford it. Preference will be given to students belonging to traditionally underrepresented groups (e.g. minority, gay, lesbian, bisexual, or transgender students) and/or first-generation students enrolled in good standing at EIU who qualify for financial aid.

To apply for this award, you will need the ID number from your EIU study abroad application.

There may be more than one opportunity open at a time. Please review the following timeline to make sure you are applying for the correct opportunity.

Spring programs will open in August-September and have an October-November deadline.

Summer programs will open in October-November and have a January-February deadline.

Fall programs will open in October-November and have a March-April deadline.

The following criteria must be met:

1. The recipient must be enrolled in good standing at EIU and qualify for financial aid
2. Preference will be given to students belonging to a traditionally underrepresented group
3. Scholarship may be spent on tuition, fees, travel expenses, study materials, and other expenditures directly related to travelling abroad
4. A past recipient may apply for and receive the award more than once as long as they continue to meet the eligibility criteria

To begin applying for this scholarship, you do not need to be finished with your online study abroad program application. Your study abroad application ID number – that is required as part of this scholarship application – is automatically generated as soon as you start your online program application. Do not wait until you are admitted to a study abroad program to submit this scholarship application. Eventually, you do need to be officially admitted to a study abroad program in order to be considered for this award. Review of scholarship applications begins immediately after the application submission deadline. Award notifications are emailed to students one week before the study abroad program's down payment (commitment deposit) deadline. Study abroad scholarship funds cannot be used to pay for program commitment deposits. Scholarship award money is disbursed to student accounts at the start of the study abroad program and is applied to any outstanding account balance first. Students are encouraged to set up direct deposit through Student Accounts prior to program departure.

⁸ [https://www.usaspending.gov/recipient/6b69c8ac-4c56-21bd-4389-6d15ebe06dcf-C/latest\[archive.is/wip/5OIwl\]](https://www.usaspending.gov/recipient/6b69c8ac-4c56-21bd-4389-6d15ebe06dcf-C/latest[archive.is/wip/5OIwl]) (accessed December 16, 2025).

EXHIBIT E

CHICAGO STATE UNIVERSITY (4)⁹

A. SCHOLARSHIPS THAT VIOLATE TITLE VI (3)

1. African American Male Resource Center (AAMRC):

Discriminatory Requirements: The AAMRC is a space at Chicago State University where African-American men can come and grow academically, professionally, culturally, and personally. With a variety of resources, services, and programs, the AAMRC seeks to prepare Black men for success as academics, scholars, professionals, community activists, husbands, and fathers.

Link: <https://www.csu.edu/dosa/diversity/AAMRC/>

Archived Link: <http://archive.today/19GLz>

Kwesi Ronald Harris African-American Male Resource Center



The AAMRC is a space at Chicago State University where African-American men can come and grow academically, professionally, culturally, and personally. With a variety of resources, services, and programs, the AAMRC seeks to prepare Black men for success as academics, scholars, professionals, community activists, husbands, and fathers.

In the thoughts and words of our great ancestor, Baba Kwesi Ronald Harris, our goal is to embrace, engage, educate, enlighten, and empower our participants with fullness and commitment. Please feel free to stop by and immerse yourself in our tight community on campus to socialize, network, study, or learn. You are welcome here.

Mission Statement

The mission of the AAMRC is to actively increase retention and graduation rates of African-American men on campus while helping participants reach their highest levels of academic, intellectual, vocational, and personal success.

2. Artice W. Harmon Memorial Scholarship:

Discriminatory Requirement: for minority students

Link: https://www.csu.edu/healthsciandpharm/OT/grants_and_scholarships.htm

Archived Link: <http://archive.today/aj9Do>

Artice W. Harmon Memorial Scholarship

Minority student demonstrating leadership and initiative for scholarly improvements. Evidence of financial need.

⁹ <https://www.usaspending.gov/recipient/a91325ee-4a02-3b30-853d-902553b5be25-C/latest> [archive.is/wip/5dgnD] (accessed December 16, 2025).

3. Batia Levy Family Scholarship:

Discriminatory Requirement: for minority students

Link: https://www.csu.edu/healthsciandpharm/OT/grants_and_scholarships.htm

Archived Link: archive.is/wip/7MYFI

Batia Levy Family Scholarship (provides for financial support for level II fieldwork

Minority student in the last year of the program. GPA of 3.0 or higher.

B. SCHOLARSHIPS THAT VIOLATE BOTH TITLE VI AND TITLE IX (1)

1. Call Me MISTER Program:

Discriminatory Requirements: A teacher recruitment program designed to address the critical shortage of African American and Latinx male teachers.

Link: https://csu.edu/collegeofeducation/call_me_mister.htm

Archive Link: <http://archive.today/Pu2qt>

Call Me Mister



The Call Me MISTER program ([Mentors Instructing Students Towards Effective Role Models](#)) is a teacher recruitment program designed to address the critical shortage of African American and Latinx male teachers.

The mission is to increase the pool of available teachers from a broader more diverse background, particularly among low performing elementary schools.

EXHIBIT F

UNIVERSITY OF ILLINOIS CHICAGO (1)¹⁰

A. SCHOLARSHIPS THAT VIOLATE TITLE VI (1)

1. Urban Health Program

Discriminatory Requirement: The UIC Urban Health Program (UHP) was established in 1978, to recruit and support students from underrepresented minority groups, specifically African Americans, Latinos, and Native Americans, into graduate and professional degree programs leading to health-related careers.

Link: <https://ahs.uic.edu/inside-ahs/student-resources/urban-health-program/#:~:text=The%C2%A0UIC%20Urban%20Health%20Program%C2%A0,healthcare%20in%20undeserved%20urban%20areas>

Archived Link: <https://web.archive.org/web/20251021042423/https://ahs.uic.edu/inside-ahs/student-resources/urban-health-program/>

Urban Health Program

The [UIC Urban Health Program](#) (UHP) was established in 1978, to recruit and support students from underrepresented minority groups, specifically African Americans, Latinos, and Native Americans, into graduate and professional degree programs leading to health-related careers. At the center of its mission, UHP has a goal of developing a pipeline of underrepresented health professionals dedicated to improving the quality and availability of healthcare in undeserved urban areas.

Each of the UIC health science colleges houses a UHP office and collaborates with the UIC Graduate College to develop programs and activities to support our students' development as professionals. In addition, UHP offices provide dedicated support and resources related to the recruitment and retention of our students.

¹⁰ https://www.usaspending.gov/award/ASST_NON_15PNIJ23GG01385DOMR_015 [archive.is/wip/dZLLa] (accessed December 16, 2025).

EXHIBIT G

WESTERN ILLINOIS UNIVERSITY (16)¹¹

The Equal Protection Project filed a complaint against Western Illinois University with Education OCR on February 26, 2024, regarding sixteen (16) discriminatory scholarships. *See* <https://legalinsurrection.com/wp-content/uploads/2024/02/OCR-Complaint-Western-Illinois-Univ.pdf> A copy of the prior Western Illinois complaint is attached. The case remains pending without action. Because WIU has moved its scholarships behind a log-in wall, we cannot determine which are still active (or if there are additional discriminatory scholarships), and therefore ask that as part of this investigation DOJ subpoena the scholarship information.

¹¹ https://www.usaspending.gov/award/ASST_NON_15JCOPS23GK01739PPSE_015 [<https://archive.is/wip/nLTF0>] (accessed December 17, 2025).



THE EQUAL PROTECTION PROJECT
A Project of the Legal Insurrection Foundation
18 MAPLE AVE. #280
BARRINGTON, RI 02806
www.EqualProtect.org

February 26, 2024

BY EMAIL (OCR.Chicago@ed.gov)

U. S. Department of Education
Office for Civil Rights – Chicago Office
John C. Kluczynski Federal Building
230 S. Dearborn Street, 37th Floor
Chicago, IL 60604

**Re: Civil Rights Complaint Against Western Illinois University Regarding Race-
And Sex-Based Scholarships**

To Whom It May Concern:

This is a federal civil rights complaint pursuant to the U.S. Department of Education's Office for Civil Rights ("OCR") discrimination complaint resolution procedures.¹ We write on behalf of the Equal Protection Project of the Legal Insurrection Foundation, a non-profit that, among other things, seeks to ensure equal protection under the law and non-discrimination by the government, and that opposes racial discrimination in any form.

We bring this civil rights complaint against the Western Illinois University ("WIU"), a public institution, for offering and promoting sixteen (16) discriminatory scholarships that either restrict eligibility to students who are "African American," "Black Women," "Latino," or students who identify as "LGBTQI+." or give preference to such students. The number and

¹ See 42 U.S.C. § 2000d-1; 34 C.F.R. §§ 100.7, 100.8, and 100.9.

scope of these discriminatory programs reflects a systemic discrimination problem at WIU, and we urge OCR to prioritize its review and promptly open an investigation and take action.

Those scholarships that discriminate based on race and skin color violate Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations.² Those that discriminate on the basis of sex, sexual orientation/gender identity violate Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations.³ And, because WIU is a public institution, all of these discriminatory scholarships violate the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution.


Scholarships That Discriminate By Race, Color and National Origin

1. **President’s Minority Graduate Access Program:** To be eligible for this scholarship, the applicant must be a “minority student.”⁴ The application deadline is March 1, 2024.

President's Minority Graduate Access Program (PMGAP)

THIS SCHOLARSHIP REQUIRES AN EXTERNAL APPLICATION. To apply, please complete the [President's Minority Graduate Access Program Application](#).

CRITERIA:

- Graduate student (regular or probationary admission)
- Full-time
- Minority student 
- U.S. citizen
- No graduate assistantship or other tuition waiver or assistance

Award
\$2,000.00

Deadline
03/01/2024

The scholarship application makes clear that the award is only “for underrepresented students,” which the form defines as “Native American/Alaskan Native, Hispanic, African American, or Asian or Island Pacific Islander.”⁵

² 42 U.S.C. § 2000d *et seq.*; 28 C.F.R. Part 100.

³ 20 U.S.C. §1681 *et seq.*; 34 C.F.R. Part 106.

⁴ See <https://wiu.academicworks.com/opportunities/12072>
[<https://web.archive.org/web/20240218023014/https://wiu.academicworks.com/opportunities/12072>]
(accessed on Feb. 17, 2024).

⁵ See https://www.wiu.edu/student_services/scholarship/pdf/PMGAP.APP.pdf
[http://web.archive.org/web/20240218022823/https://www.wiu.edu/student_services/scholarship/pdf/PMGAP.APP.pdf] (accessed on Feb. 17, 2024).

**PRESIDENT'S MINORITY GRADUATE ACCESS PROGRAM APPLICATION
for Underrepresented Students***

Name: _____ Student ID #: _____

Address: _____

Undergraduate College or University: _____

Check One: U.S. Citizen _____ Permanent Resident _____

Applying for funds beginning: Fall 20____ or Spring 20____

Attach an essay (500-1,000 words) that addresses the following:

1. Your short and long term career goals and how a graduate degree will help you to attain these goals.
2. The impact of your undergraduate degree toward your career goals. Describe whether your undergraduate experience was positive or negative, and how you will apply this experience to your graduate education and career goals.
3. Discuss your extracurricular activities, work experience, volunteer work, or any other information you feel might appropriately illustrate your potential as a mature individual pursuing a graduate degree.

Attach or submit separately at least one letter of recommendation using the Recommendation Form.

*Underrepresented students have one or more ethnic origin: Native American/Alaskan Native, Hispanic, African American, or Asian or Island Pacific Islander.

2. **Robert H. Haley Educational Excellence Scholarship**: The criteria for this scholarship provides that “first preference will be given to African-American students.”⁶ The application deadline is March 1, 2024.

Robert H. Haley Educational Excellence Scholarship

Robert Haley graduated from Western Illinois University in 1985 with a bachelor's degree in Law Enforcement Administration and in 1987 with a master's degree in Law Enforcement Administration. At WIU he was involved with the Black Students Association and worked as a graduate assistant in the Gwendolyn Brooks Cultural Center. Robert is CEO and Chairperson of QIS Behavioral Health, an officebased opioid treatment center near Cincinnati, Ohio. Robert was born and raised in East St. Louis and cares deeply about supporting his community.

CRITERIA:

- Student must have a 618-area code
- First preference will be given to African-American students
- Good academic standing

Award
\$1,000.00

Deadline
03/01/2024

3. **Dr. Essie Manuel Rutledge Scholarship**: To be eligible for this scholarship, a student must be a full-time junior or senior at the university and be “African American.”⁷ The application deadline is March 1, 2024.

⁶ See <https://wiu.academicworks.com/opportunities/13155> [https://archive.is/Njd8B] (accessed on Feb. 17, 2024).

⁷ See <https://wiu.academicworks.com/opportunities/12418> [https://archive.is/fUiij] (accessed on Feb. 17, 2024).

U.S. Dept. of Education, Office for Civil Rights
Administrative Complaint Against Western Illinois University
February 26, 2024
Page 4 of 14

DR. ESSIE MANUEL RUTLEDGE SCHOLARSHIP

Dr. Rutledge was Chair/Professor of African American Studies at WIU from September 1976 until 1984 and Professor of Sociology from January 1983 until her retirement. She was the first and only African American female ever to chair at department at WIU as of the time the fund was established. CRITERIA: Full-time, African American student, Junior or Senior (minimum 60 semester hours completed) by Spring, prior to Fall award, Minimum cumulative GPA of 3.0 (transfer GPA may be included) after 30 semester hours at WIU; First preference, African American Studies Major, Second preference, Sociology major with an African American Studies minor, Third preference, any major, Written essay ??? 2-3 pages to explain what previous and/or present activities and experiences demonstrate her/his potential leadership qualities that foster social justice.

4. **James and Veronica Shipp Scholarship:** To be eligible for this award, the applicant must be an “African-American incoming freshman student.”⁸ The application deadline is March 1, 2024.


James and Veronica Shipp Scholarship

HISTORY:

James E. Shipp received his bachelor's degree in education from Western in 1964. Shipp began his career in 1964 in the Juvenile Justice System for the State of Illinois, and later with the City of Chicago. Four years after graduating from WIU, he was selected to participate in the first National Urban Fellow class and was assigned to fieldwork with the Bedford Stuyvesant Restoration Corporation in Brooklyn, NY. Shipp eventually became vice president of the Bad-Stuy Corporation until 1979. In addition to his work with the Restoration Corporation, he also served as a director of several city, state and national organizations focused on urban development issues. In addition to serving as president and CEO of Shipp Enterprises, LLC in White Plains, NY, Shipp has maintained a commitment and dedication to public service by continuing to serve on such boards as the South Bronx Overall Economic Development Corporation, the Mid Bronx Desperados Community Housing Corporation and the Gillen Brewer School for children with disabilities.

While a student at WIU, Shipp was a member of Tau Kappa Epsilon fraternity and was a record-setting conference champion and national finalist wrestler. Shipp was inducted into the WIU Athletic Hall of Fame in 1997 and received the WIU Distinguished Alumnus Award in 1996. Shipp also received an honorary Doctorate from WIU in May of 2018. He remains an active member of his alma mater as a member of the WIU President's National Advisory Board.

CRITERIA:

- African-American incoming freshmen student 
- Preferably first-generation college student
- Minimum 2.75 GPA
- Major in the university's STEM (science, technology, engineering or math) programs. (A change in majors terminates their eligibility for funding from these resources.)
- Students must submit an essay describing their interest in the major selected.

TERMS:

Award amount is \$4000 per year. Amount will be applied to the student's university account, half Fall and half Spring. When accumulated income is sufficient for more than one scholarship, two or more recipients may be selected.

Automatically be eligible for funding for the next three years if they maintain a 2.75 for each academic year.

5. **Ralph and Gladys Anderson Scholarship for African Americans:** To be eligible for this scholarship, the applicant must be an “African American student.”⁹ The application deadline is March 1, 2024.

RALPH & GLADYS ANDERSON SCHOLARSHIP FOR AFRICAN AMERICANS

The Ralph and Gladys Anderson Scholarship was established by Ralph and Gladys Anderson. Gladys saved enough money to fulfill her high school dream of attending Western Illinois State Teachers College. CRITERIA: African American student, Curriculum & Instruction major pursuing the Elementary Education option at WIU, Completed 60 semester hours in the spring prior to fall award, Minimum cumulative GPA 3.0 (includes transfer GPA for new transfers).

⁸ See <https://wiu.academicworks.com/opportunities/12933> [https://archive.is/azVns] (accessed on Feb. 17, 2024).

⁹ See <https://wiu.academicworks.com/opportunities/12071> [https://archive.is/uYbgf] (accessed on Feb. 17, 2024).

6. **Dr. George E. Ayers Scholarship**: To qualify for this scholarship, an applicant must be a “minority.”¹⁰ While WIU does not define “minority,” it is clear from the nature of the scholarship and other WIU programs listed below that use that term, that “minority” is a racial and/or ethnic classification. The application deadline for this scholarship is March 1, 2024.

Dr. George E. Ayers Scholarship

The Ayers Family Established this memorial scholarship for Dr. George E. Ayers who earned a B.S. degree from WIU in 1961. Dr. Ayers spent more than 50 years in higher education as a university administrator and then as a consultant. He was always concerned with the access to higher education for under served groups and successful completion of degree programs.

Criteria:

US. Citizenship

Minority 

GPA 3.0

Financial Need

Any class


Rank by highest GPA

7. **Michael Litwin Scholarship**: To qualify for this scholarship, an applicant must be a “minority student from Chicago.”¹¹ The application deadline is March 1, 2024.

Michael Litwin Scholarship

The Michael J. Litwin Scholarship was established by WIU College of Business alumnus, Michael J. Litwin.

CRITERIA:

- Incoming freshman
- Minority student from Chicago 
- Minimum ACT 25
- Upper 20% of graduating class
- Pre-business major

Award

\$2,000.00

Questions regarding eligibility? Contact:

WIU Scholarship Office (New Freshman)

Deadline

03/01/2024

¹⁰ See <https://wiu.academicworks.com/opportunities/11741> [https://archive.is/dIEoZ] (accessed on Feb. 17, 2024).


¹¹ See <https://wiu.academicworks.com/opportunities/11367> [https://archive.is/mgC99] (accessed on Feb. 17, 2024).

8. **Minority Achievement Scholarship:** To be eligible for this scholarship, applicants must be “ethnic minorities.”¹² The application deadline is March 1, 2024.

Minority Achievement Scholarship

The Minority Achievement Program was established to support talented minority students enrolled at WIU.

CRITERIA:

- Incoming freshman
- Ethnic minority 
- U.S. citizen
- Minimum ACT 20 and graduated in upper 1/3 of high school graduating class or has a 3.5 GPA
- Leadership, community service, and extracurricular activities may be considered
- Preference given to a student who is not receiving the Western Centennial or another Foundation Scholarship

9. **Leroy Daniels Scholarship:** To be eligible for this scholarship, an applicant must be a “minority student.”¹³ The application deadline is May 1, 2024.

Leroy Daniels Scholarship

The Leroy Daniels Scholarship was established in 1986 by the Gwendolyn Brooks Cultural Center and community donors including the late Lois Mills, WIU Librarian, in memory of Leroy W. Daniels. Daniels was employed at WIU from September 1968 until his death in August 1984. Leroy, along with his brother Joe, was one of the organizers and a charter member of the McDonough County Chapter of the NAACP (established in 1969). He served as president for more than 11 years.


CRITERIA:

- Minimum 2.5 cumulative GPA
- Minority student 
- Illinois resident
- Demonstrated evidence of leadership activities in college or the community is desired
- Preference is given to a student graduate of Macomb Senior High School

10. **WIU-QC Minority Student Scholarship:** To be eligible for this scholarship, an applicant must be a “minority student.”¹⁴ The application deadline is July 1, 2024.

WIU-QC Minority Student Scholarship

CRITERIA:

- Any class level
- Undergraduate or graduate
- WIU-QC student
- All majors
- Minimum 2.5 WIU GPA
- Minority student 
- Demonstrated volunteer service
- Financial need
- Essay

¹² See <https://wiu.academicworks.com/opportunities/12271> [https://archive.is/yCj1K] (accessed on Feb. 17, 2024).

¹³ See <https://wiu.academicworks.com/opportunities/11388> [https://archive.is/0jcZo] (accessed on Feb. 17, 2024).

¹⁴ See <https://wiu.academicworks.com/opportunities/12070> [https://archive.is/KkNhx] (accessed on Feb. 17, 2024).


11. **Ruth Hughes WESL Scholarship**: This scholarship explicitly provides that “preference will be given to African American students.”¹⁵ The application deadline has passed.

Ruth Hughes WESL Scholarship

Award: \$800 scholarship, available fall semester

- Closed.

Criteria:


- Open to a student enrolled at WIU who is preparing to enter the field of ESL and who might be a student assistant in the WESL Institute
- Open to a graduate of the WESL Institute who has become a regularly admissible full-time student at Western Illinois University
- Preference will be given to African American students. 

12. **Joann Amos Elliott Memorial Scholarship**: This scholarship provides that “first preference” will be given to “a minority student.”¹⁶ The application deadline is March 1, 2024.

Joann Amos Elliott Memorial Scholarship

John Elliott established the Joann Amos Elliott Memorial Scholarship in memory of his wife. Joann attended Monmouth High School where she was an outstanding student, splendid athlete, and a cheerleader. After high school Joann enrolled at Western Illinois University where she met the love of her life John Elliott. John and Joann were married on April 10, 1964 in Macomb. John participated in track and field at Western and was a member of Alpha Phi Omega. John had an outstanding career in business and in recognition of his achievements he received the Alumni Achievement Award in 2017 from Western Illinois University. Joann cherished her family and the many great times she had with them. Joann cherished her role as a mother and a grandmother and together John and Joann shared a lifetime of laughter, joy, and pride in their family.

CRITERIA:

- *Graduate of Monmouth-Roseville High School
- *Incoming freshman student
- *Minimum high school cumulative 3.0 GPA
- *Participation in school and/or community activities
- *First preference to a minority student 

Scholarships That Discriminate By Sex

13. **Supporting LGBTQ+ Leathernecks Scholarship**: The description of this scholarship provides that it “is intended for LGBTQ+ identified WIU students who demonstrate financial need and are in good academic standing. Priority should be given to LGBTQ+ identified undergraduate students, next priority shall be LGBTQ+ identified graduate students. Should no applicants who identify as LGBTQ+ at the undergraduate level, the scholarship may be awarded to undergraduate students who demonstrate financial need and also indicate

¹⁵ See https://www.wiu.edu/global_studies/scholarships.php [https://archive.is/WVGhi] (accessed on Feb. 17, 2024).

¹⁶ See <https://wiu.academicworks.com/opportunities/12901> [https://archive.is/RdDpE] (accessed on Feb. 17, 2024).

examples of personal allyship in support of LGBTQ+ individuals.”¹⁷ The deadline to apply is March 1, 2024.

Supporting LGBTQ+ Leathernecks

Molly B. Holmes is a double alumnus of WIU (B.S., '01, M.S., '04). With degrees in Health Education-teacher education and College Student Personnel, Molly's passion for educating others began at Western. Because of support of both her academic goals and queer identity at WIU, Molly has committed her professional work to creating similar support for individuals with underrepresented identities. She currently serves as the director of the Gender and Sexuality Resource Center at Northern Illinois University.


CRITERIA:

This scholarship is intended for LGBTQ+ identified WIU students who demonstrate financial need and are in good academic standing. Priority should be given to LGBTQ+ identified undergraduate students, next priority shall be LGBTQ+ identified graduate students. Should no applicants who identify as LGBTQ+ at the undergraduate level, the scholarship may be awarded to undergraduate students who demonstrate financial need and also indicate examples of personal allyship in support of LGBTQ+ individuals.

Scholarships That Discriminate By Race And Sex


14. **Marchet Harts Communication Award for Women of Color:** This scholarship is restricted to “women of color.”¹⁸ The application deadline is March 1, 2024.

CRITERIA:

- Woman of color 
- Incoming Freshman or Transferring Junior
- Student should pursue a Communication major in any related discipline with the Department of Communication, and demonstrate a desire to graduate and contribute to said career field.
- Applicant should write a one to two-page essay on their career aspirations. The essay should include how the student plans to give back to their alma mater after graduation.

Additionally, the application includes “supplemental questions” which explicitly ask whether the applicant “identif[ies] as a person of color.”¹⁹

Supplemental Questions

1. Do you consent to participating in a mentorship opportunity with Minda Harts?
2. If selected as the scholarship recipient, do you:
 - Authorize the release of your contact information (WIU email, phone number) to the donor?
 - Phone Number:
3. Do you identify as a person of color? 
4. Describe your educational and career aspirations and how you plan to give back to your alma mater (Western Illinois University) after graduation.

15. **The Donald A. Haisch Scholarship:** The scholarship provides that “first preference should be given to applicants who self-identify as LGBTQ+” and that “second preference is for BIPOC recipients.”²⁰

¹⁷ See <https://wiu.academicworks.com/opportunities/11878> [https://archive.is/JRtoB] (accessed on Feb. 17, 2024).

¹⁸ See <https://wiu.academicworks.com/opportunities/11311> [https://archive.is/h63uL] (accessed on Feb. 17, 2024). BIPOC is a commonly used acronym for “black, indiginous and people of color.”

¹⁹ *Id.*

²⁰ See <https://wiu.academicworks.com/opportunities/11413> [https://web.archive.org/web/20240218024949/https://wiu.academicworks.com/opportunities/11413] (accessed on Feb. 17, 2024).

Donald A. Haisch Scholarship

This scholarship fund has been established by Mr. Donald A. Haisch in the spring of 2020. At the time of creation, Mr. Haisch is a Managing Director and Chief Accounting Officer, Real Estate in the Ares Finance, Accounting and Operations Department. Prior to joining Ares in 2014, Mr. Haisch was a Senior Vice President in the Finance Department of CBRE. Mr. Haisch serves on the Board of Directors of Bob Hope USO, which provides USO services, programming and outreach in Southern and Central California. He holds a B.S., magna cum laude, from Western Illinois University in Accounting and an M.B.A. from the University of California Los Angeles. In addition to a variety of University activities, he participated in the Accounting Society and Beta Alpha Psi.

CRITERIA:

Major in Accounting

Minimum 2.5 GPA

Enrolled full-time

Involvement in department activities and a demonstrated interest in an accounting-related career

Junior level standing, or 60 credit hours completed, at time award is made

First preference should be given to applicants who self-identify as LGBTQ+

Second preference is for BIPOC recipients

Award

\$1,000.00

Questions regarding eligibility? Contact:

Accounting & Finance, College of Business & Technology

Deadline

03/01/2024

Supplemental Questions

1. Diversity scholarship

- Do you consider yourself a member of the LGBTQ+ community?
- If yes, How do you label that group?

16. Alejandro Valadez Memorial Scholarship in Law Enforcement & Justice Administration: Eligibility for this scholarship requires that the supplicant be a “Latino male student.”²¹ The application deadline in March 1, 2024.

ALEJANDRO VALADEZ MEMORIAL SCHOLARSHIP

Following the death of Police Officer Alejandro “Alex” Valadez, Sigma Lambda Beta fraternity brothers chose to honor him with a scholarship at WIU. CRITERIA: Student must be a second semester freshman, sophomore, junior, or first semester senior, Latino male student, Strong commitment to academics, 3.0/4.0 GPA at WIU.

The Scholarships Listed Above Violate The Law

WIU violates Title VI by conditioning eligibility for certain scholarships on race, national origin and skin color. And, it violates Title IX where its scholarships condition eligibility on the applicant’s gender, sexual orientation or gender identity. Because WIU is a public institution, its participation in the scholarships listed here also violates the Equal Protection Clause of the Fourteenth Amendment.²²

²¹ See <https://wiu.academicworks.com/opportunities/11964> [https://archive.is/nkH55] (accessed on Feb. 17, 2024).

²² Although OCR does not enforce Title II of the Civil Rights Act of 1964, that statute makes it unlawful to discriminate on the basis of race or color in a place of “public accommodation,” such as WIU. 42 U.S.C. § 2000(a)(a). Several, if not all, of the scholarships listed here also violate the Illinois Human Rights Act, which prohibits discrimination based on, among other categories, race, color, sexual

In *Students for Fair Admissions Inc. v. President & Fellows of Harv. Coll.*, 2023 U.S. LEXIS 2791 (2023), the Supreme Court declared that “[e]liminating racial discrimination means eliminating all of it The guarantee of equal protection cannot mean one thing when applied to one individual and something else when applied to a person of another color. If both are not accorded the same protection, then it is not equal.” *Id.* at 34 (cleaned up). “Distinctions between citizens solely because of their ancestry [and race] are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.” *Id.* at 35 (citation omitted).

Title VI of the Civil Rights Act prohibits intentional discrimination on the basis of race, color or national origin in any “program or activity” that receives federal financial assistance. *See* 42 U.S.C. § 2000d. The term “program or activity” means “all of the operations ... of a college, university, or other postsecondary institution, or a public system of higher education.” *See* 42 U.S.C. § 2000d-4a(2)(A); *Rowles v. Curators of the Univ. of Mo.*, 983 F.3d 345, 355 (8th Cir. 2020) (“Title VI prohibits discrimination on the basis of race in federally funded programs,” and thus applies to universities receiving federal financial assistance). As WIU receives federal funds,²³ it is subject to Title VI.

It does not matter if the recipient of federal funding discriminates in order to advance a benign “intention” or “motivation.” *Bostock v. Clayton Cty.*, 140 S. Ct. 1731, 1742 (2020) (“Intentionally burning down a neighbor’s house is arson, even if the perpetrator’s ultimate intention (or motivation) is only to improve the view.”); *accord Automobile Workers v. Johnson Controls, Inc.*, 499 U. S. 187, 199 (1991) (“the absence of a malevolent motive does not convert a facially discriminatory policy into a neutral policy with a discriminatory effect” or “alter [its] intentionally discriminatory character”). “Nor does it matter if the recipient discriminates against an individual member of a protected class with the idea that doing so might favor the interests of that class as a whole or otherwise promote equality at the group level.” *Students for Fair Admissions*, 2023 U.S. LEXIS 2791, at *154 (Gorsuch, J., concurring).

Simply put, “Title VI prohibits a recipient of federal funds from intentionally treating any individual worse even in part because of his race, color, or national origin and without regard to any other reason or motive the recipient might assert.” *Id.* at *170 (cleaned up). Thus, regardless of WIU’s reasons for sponsoring and promoting these scholarships, it is violating Title VI by doing so.

Likewise, Title IX makes it unlawful to discriminate on the basis of sex in education. That statute provides that “[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any

orientation and gender-identity. 775 I.L.C.S. 5/1 et seq. Finally, these scholarships defy WIU’s own non-discrimination policy. *See* <http://tinyurl.com/bddhnat9> [<https://archive.is/jw2To>] (accessed on Feb. 18, 2024).

²³ *See* <https://www.wiu.edu/foundation/faq.php> [<https://archive.is/VQyHN>] (accessed on Feb. 18, 2024).

education program or activity receiving Federal financial assistance.” 20 U. S. C. §1681(a). The Supreme Court has interpreted “sex” discrimination in employment to encompass discrimination on the basis of sexual orientation or gender identity status. *Bostock*, 140 S. Ct. at 1731. Although *Bostock* involved Title VII, we suggest that OCR has authority to apply that principle here given OCR’s broad mandate to enforce anti-discrimination civil rights statutes in the context of education, such as Title IX. *See Bostock*, 140 S. Ct. at 1778-80 (Alito, J., dissenting) (recognizing that the *Bostock* majority’s decision could affect the interpretation of Title IX “whose terms mirror Title VII’s”); *see also Papelino v. Albany College of Pharm. of Union Univ.*, 633 F.3d 81, 89 (2d Cir. 2011) (Title VII principles apply in interpreting Title IX).

As noted, because WIU is a public institution, its creation, sponsorship and promotion of discriminatory scholarships also violates the Equal Protection Clause of the Fourteenth Amendment, and “[a]ny exception to the Constitution’s demand for equal protection must survive a daunting two-step examination known ... as strict scrutiny.” *Id.* at *34 (internal quotation marks and citation omitted).²⁴ The scholarships at issue here flunk that exacting test.

Under strict scrutiny, suspect classifications “are constitutional only if they are narrowly tailored measures that further compelling governmental interests.” *Adarand Constructors v. Pena*, 515 U.S. 200, 227 (1995). It is the government that bears the burden to prove “that the reasons for any [racial] classification [are] clearly identified and unquestionably legitimate.” *Richmond v. J. A. Croson Co.*, 488 U.S. 469, 505 (1989). Here, the government cannot carry its burden.

A “racial classification, regardless of purported motivation, is presumptively invalid and can be upheld only upon an extraordinary justification.” *Shaw v. Reno*, 509 U.S. 630, 643-44 (1993) (citation omitted). Here, WIU cannot demonstrate that restricting participation in scholarships to students who are “African American,” “Latino men,” “women of color,” “BIPOC” “LGBTQ+ identified,” “minorities,” “ethnic minorities,” “Native American/Alaskan Native,” “Hispanic” or “Asian or Island Pacific Islander” serves any legitimate governmental purpose, let alone an extraordinary one. Classifications based on immutable characteristics like skin color “are so seldom relevant to the achievement of any legitimate state interest” that government policies “grounded in such considerations are deemed to reflect prejudice and

²⁴ Although sex-based discrimination is subject to a “heightened” standard of review, *Sessions v. Morales-Santana*, 582 U. S. 47, 57 (2017); *United States v. Virginia*, 518 U. S. 515, 532-34 (1996), it is less exacting than the strict scrutiny standard applicable to race-based classifications. Under Supreme Court precedent, sex-based classifications by the government require an “exceedingly persuasive justification.” *Virginia*, 518 U. S. at 531. To make this showing, the government must demonstrate “at least that the [challenged] classification serves important governmental objectives and that the discriminatory means employed are substantially related to the achievement of those objectives.” *Id.* at 533. The scholarships identified in this complaint fall short of satisfying this standard for the same reasons they fail strict scrutiny.

antipathy – a view that those in the burdened class are not as worthy or deserving as others.” *City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 440 (1985).

Indeed, the Supreme Court has recognized only two interests compelling enough to justify racial classifications. The first is remedying the effects of past *de jure* segregation or discrimination in the specific industry and locality at issue in which the government played a role, and the second is “avoiding imminent and serious risks to human safety in prisons, such as a race riot.” *Students for Fair Admissions*, 2023 U.S. LEXIS 2791, at *35 (citation omitted).²⁵ Neither applies here.

If the scholarships are intended to achieve racial balance, such an objective has been “repeatedly condemned as illegitimate” and “patently unconstitutional” by the Supreme Court. *Parents Involved in Cmty. Sch.*, 551 U.S. at 726, 730 (“Accepting racial balancing as a compelling state interest would justify the imposition of racial proportionality throughout American society, contrary to our repeated recognition that at the heart of the Constitution’s guarantee of equal protection lies the simple command that the Government must treat citizens as individuals, not as simply components of a racial, religious, sexual or national class”) (cleaned up, citation omitted).

And, irrespective of whether the scholarships’ classifications based on immutable characteristics further a compelling interest, those classifications are not narrowly tailored. *Grutter v. Bollinger*, 539 U.S. 306, 334 (2003) (to be to be narrowly tailored, a race-conscious program must be based on “individualized consideration,” and race must be used in a “nonmechanical way”). Here, the race-based eligibility criteria are mechanically applied. If applicants do not meet the racial requirements, they are either automatically disqualified for the scholarships or relegated to a non-preferred status. To the extent that any individualized consideration exists, it only applies to distinguish between applicants who have first satisfied the threshold racial litmus test.

Further, a policy is not narrowly tailored if it is either overbroad or underinclusive in its use of racial classifications. *J.A. Croson Co.*, 488 U.S. at 506. Indeed, in *Students for Fair Admissions*, the Supreme Court found that similar categories as those used by WIU for the above-listed scholarships were “imprecise,” “plainly overbroad,” “arbitrary,” “undefined” and “opaque.” *Students for Fair Admissions*, 2023 U.S. LEXIS 2791, at *47-48,²⁶ and declared that

²⁵ Until recently, a third interest, “the attainment of a diverse student body,” existed, *see Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 720-22 (2007), but that was substantively overruled by *Students for Fair Admissions*, a fact recognized by Justice Thomas in his concurring opinion. *Students for Fair Admissions*, 2023 U.S. LEXIS 2791, at *149 (Thomas, J. concurring) (“The Court’s opinion rightly makes clear that *Grutter* is, for all intents and purposes, overruled.”)

²⁶ In his concurrence, Justice Thomas criticizes these categories as being “artificial.” *Students for Fair Admissions*, 2023 U.S. LEXIS 2791, at *134 (Thomas, J., concurring).

“it is far from evident ... how assigning students to these ... categories and making admissions decisions based on them furthers the educational benefits that the universities claim to pursue.” *Id.*

Similarly, restrictions that limit students from participating in a scholarship due to race are underinclusive since they are arbitrary and exclude swaths of students who would otherwise qualify.

Finally, for a policy to survive narrow-tailoring analysis, the government must show “serious, good faith consideration of workable race-neutral alternatives,” *Grutter*, 539 U.S. at 339, and that “no workable race-neutral alternative” would achieve the purported compelling interest. *Fisher v. Univ. of Tex. at Austin*, 570 U.S. 297, 312 (2013). There is no evidence that any such alternatives were ever contemplated here.

Because WIU’s blatant racial preference system for a wide range of their scholarships is presumptively invalid, and since there is no compelling government justification for such invidious discrimination, its use of racial preferences violates state and federal civil rights statutes and constitutional equal protection guarantees.

OCR Has Jurisdiction

OCR has jurisdiction over this complaint. WIU is a public institution and a recipient of federal funds. It is therefore liable for violating Title VI, Title IX and the Equal Protection Clause.

The Complaint Is Timely

This complaint is timely brought because it includes allegations of discrimination based on race, color, national origin and sex that appears to be ongoing.

Request For Investigation And Enforcement

In *Richmond v. J. A. Croson Co.*, Justice Scalia aptly noted that “discrimination on the basis of race is illegal, immoral, unconstitutional, inherently wrong and destructive of a democratic society.” 488 U.S. at 505 (citation omitted). This is true regardless of which race suffers – discrimination against white applicants is just as unlawful as discrimination against black or other non-white applicants. As Justice Thomas correctly noted in *Students for Fair Admissions*, race-based admissions preferences “fly in the face of our colorblind Constitution and our Nation’s equality ideal” and “are plainly – and boldly – unconstitutional.” *Students for Fair Admissions*, 2023 U.S. LEXIS 2791, at *150 (Thomas, J., concurring).

Because the discriminatory scholarship eligibility criteria outlined above are presumptively invalid, and since WIU cannot show any compelling government justification for

those restriction, WIU's limitation of scholarships on the basis of race and sex violates federal civil rights statutes and constitutional equal protection guarantees.

The Office for Civil Rights has the power and obligation to investigate WIU's role in creating, supporting and promoting these scholarships – and, given the amount of them, to discern whether WIU is engaging in such discrimination in its other activities – and to impose whatever remedial relief is necessary to hold it accountable for that unlawful conduct. This includes, if necessary, imposing fines, initiating administrative proceedings to suspend or terminate federal financial assistance and referring the case to the Department of Justice for judicial proceedings to enforce the rights of the United States under federal law. After all, “[t]he way to stop discrimination ... is to stop discriminating[.]” *Parents Involved in Cmty. Sch.*, 551 U.S. at 748.

Accordingly, we respectfully ask that the Department of Education's Office for Civil Rights prioritize and expedite this complaint given the apparent systemic discrimination at WIU, promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from these WIU scholarships based on discriminatory criteria, and ensure that all ongoing and future programming through WIU comports with the Constitution and federal civil rights laws.

Sincerely,



Ameer Benno, Esq.

The Equal Protection Project

Ameer@legalinsurrection.com

-And-

William A. Jacobson, Esq.

President

Legal Insurrection Foundation

Contact@legalinsurrection.com