



**THE EQUAL PROTECTION PROJECT**  
**A Project of the Legal Insurrection Foundation**  
**18 MAPLE AVE. #280**  
**BARRINGTON, RI 02806**  
[www.EqualProtect.org](http://www.EqualProtect.org)

March 19, 2025

**BY EMAIL** (OCR@ed.gov)

Craig Trainor, Acting Assistant Secretary  
Office for Civil Rights  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**BY EMAIL** (OCR.Boston@ed.gov)

Office for Civil Rights – Boston Office  
US Department of Education  
9<sup>th</sup> Floor  
5 Post Office Square  
Boston, MA 02109-3921

**Re: Civil Rights Complaint Against North Star Collective**  
**BIPOC Fellowship 2024-2025 Institutional Members**  
(Boston University, Bridgewater State University, Endicott College, Framingham State University, Goodwin University, Rhode Island College, Roger Williams University, Sacred Heart University, Salem State University, Simmons University, University of Bridgeport, University of Hartford, University of Maine, University of Massachusetts Amherst, University of Massachusetts Boston, University of New Hampshire, University of Southern Maine, University of Vermont, Westfield State University, Worcester State University)

To Mr. Trainor and OCR Staff:

This is a federal civil rights complaint submitted pursuant to the U.S. Department of Education’s Office for Civil Rights (“OCR”) discrimination complaint resolution procedures.<sup>1</sup> We write on behalf of the Equal Protection Project of the Legal Insurrection Foundation, a non-

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

profit entity 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 make this civil rights complaint against the twenty (20) higher education institutions (“Collective Members”) comprising the 2024-2025 North Star Collective (“Collective”), for administering and promoting the North Star Collective Fellowship (“BIPOC Fellowship”) which provides educational opportunities and programming to faculty and discriminates on the basis of race, color, and/or national origin in violation of Title VI.<sup>2</sup>

The BIPOC Fellowship operates in a manner similar to the “Ph.D. Project” that was the focus of recent OCR action.<sup>3</sup> The following institutions were listed on the Collective website as 2024-2025 Institutional Members.<sup>4</sup>

Boston University  
Bridgewater State University  
Endicott College,  
Framingham State University  
Goodwin University  
Rhode Island College  
Roger Williams University  
Sacred Heart University  
Salem State University  
Simmons University  
University of Bridgeport  
University of Hartford  
University of Maine  
University of Massachusetts Amherst  
University of Massachusetts Boston  
University of New Hampshire  
University of Southern Maine  
University of Vermont  
Westfield State University  
Worcester State University

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<sup>2</sup> <https://archive.is/LoEjT> (accessed March 17, 2025).

<sup>3</sup> <https://www.ed.gov/about/news/press-release/office-civil-rights-initiates-title-vi-investigations-institutions-of-higher-education-0> [<https://archive.is/1r7Qt>] (accessed March 17, 2025). School sponsored or endorsed aspects of campus life that separate faculty based on race are segregationist practices that violate Title VI. *See* <https://www.ed.gov/media/document/frequently-asked-questions-about-racial-preferences-and-stereotypes-under-title-vi-of-civil-rights-act-109530.pdf>

<sup>4</sup> <https://web.archive.org/web/20250213172256/https://nebhe.org/reparative-justice/northstarcollective/> (accessed March 17, 2025)



**North Star Collective**

The Collective is “a group of colleges and universities in the New England region that are working towards transformative racial equity and are committed to supporting and uplifting Black, Brown, Indigenous, and other faculty of color (“BIPOC”) on their campuses.” The Collective is part of the New England Board of Higher Education (“NEBHE”), focused on a

“...broader reparative justice initiative, which is committed to restoring, nourishing and uplifting BIPOC faculty in the region, and supporting leaders as they transform institutions around racial equity.”<sup>5</sup>

NEBHE established the Collective in 2021<sup>6</sup>, in part, for Collective Members to “...collaborate, share best practices, and problem-solve on issues related to faculty racial equity on their campuses.”<sup>7</sup> NEBHE actively promoted the BIPOC Fellowship at least until February 13, 2025. Sometime after that date, NEBHE removed the Collective pages from its website without explanation.<sup>8</sup> While clearly operating during the 2024-2025 academic year, it is unclear what the plans are for next academic year.



### **North Star Collective BIPOC Fellowship**

Collective members receive up to two seats in the BIPOC Fellowship. The BIPOC Fellowship “promotes healing and repair by providing a nourishing community of care,

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<sup>5</sup> <https://web.archive.org/web/20250213172256/https://nebhe.org/reparative-justice/northstarcollective/> (accessed March 15, 2025).

<sup>6</sup> <https://nebhe.org/info/pdf/reparativejustice/North-Star-Collective-Brochure.pdf> [archive.ph/wip/ndPJt] (accessed March 18, 2025).

<sup>7</sup> [nsc-2024-fellows-press-release.pdf](#) [archive.is/wip/ECUbQ] (accessed March 18, 2025).

<sup>8</sup> The link for the BIPOC Fellowship <https://nebhe.org/reparative-justice/northstarcollective/> currently is inactive and there is no longer mention of the BIPOC Fellowship on the NEBHE website. Archive.org shows that this link was active until at least February 13, 2025. See <https://web.archive.org/web/20250213172256/https://nebhe.org/reparative-justice/northstarcollective/>.

mentorships and professional development for early career BIPOC faculty in New England.” It was “...created by BIPOC faculty for BIPOC faculty to support their professional development.”<sup>9</sup> Although Collective members may only send two (2) faculty members to the BIPOC Fellowship, there is no limit on the number that may apply.<sup>10</sup>

Further, Collective Members must pay a yearly membership fee of \$6,500 as well as promote the BIPOC Fellowship.



The **New England Board of Higher Education (NEBHE)** invites applications for the **North Star Collective BIPOC Faculty Fellowship**. The Fellowship is a semester long (Spring 2025) and promotes racial healing and holistic wellbeing by providing a nourishing community of care, peer mentorship, and professional development for BIPOC faculty in New England at NSC member institutions. The Fellowship was **created by BIPOC faculty for BIPOC faculty** and is focused specifically on supporting fellows' writing and publishing endeavors and overall wellbeing, which are both essential to advancement, tenure, and promotion. The Fellowship is unique in that it focuses on racial trauma healing and provides a support network for BIPOC faculty to help navigate the challenges they face in their academic careers, to promote wellness and healthy work-life balances, and to foster a community of care for Fellows' holistic growth.

For the Spring 2025 Fellowship, **NEBHE hopes to select up to two fellows from each NSC member institution** (approximately 30-32 total).

### **BIPOC Fellowship Benefits**

Fellows receive a \$1,000 stipend, admission to two (2) multi-day writing retreats, attendance at a biweekly virtual writing accountability group, closing ceremony, networking opportunities, and research promotion.

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<sup>9</sup> [https://www.hartford.edu/unotes/nscfacultyfellowship\\_callforapplicationspring2025.pdf](https://www.hartford.edu/unotes/nscfacultyfellowship_callforapplicationspring2025.pdf) [archive.ph/wip/AcKcS] (accessed March 18, 2025).

<sup>10</sup> [https://archive.org/details/north-star\\_202503](https://archive.org/details/north-star_202503) (accessed March 17, 2025).



The BIPOC Fellowship also “...provides a support network for BIPOC faculty to help navigate the challenges they face in their academic careers, including isolation, lack of community and mentorship, and barriers to publication...”<sup>11</sup>

## FACULTY FELLOWSHIP BENEFITS

- **A \$1,000 stipend** for research, publication, and professional development
- **A Writing Retreat** (3 days/2 nights) with a mentored workshop “Owning Your Writing Practice: A Holistic Approach to More Joyful and Productive Writing” in January 2025
- **An In-Person Midpoint Writing Getaway** (2 days/1 night) with a mentored workshop “Planning for Tenure, Promotion, or Alt-Ac Careers as BIPOC Faculty in PWIs” in March 2025
- **Biweekly Virtual Writing Accountability Groups** with peer fellows (two hours every other week for three months in the semester: February - April 2025)
- **A Closing Colloquium and Honoring Ceremony** to celebrate fellows with a mentored workshop “Beyond Academia: Is There Such a Thing as Work-Life Balance?” in May 2025
- **Networking and peer mentorship**
- Opportunities for fellows to **promote and elevate research**

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<sup>11</sup> [https://nebhe.org/info/pdf/annualreport/2024/NEBHE\\_Annual\\_Report\\_2024.pdf](https://nebhe.org/info/pdf/annualreport/2024/NEBHE_Annual_Report_2024.pdf) [archive.is/wip/n6dJC] (accessed March 18, 2025).

### **BIPOC Fellowship Eligibility Requirements**

The BIPOC Fellowship requires Faculty to be “Self-identifying BIPOC faculty.” BIPOC faculty is defined by the Collective as “... those who are Black/African/African American, Latinx/Hispanic, Native/Indigenous, Arab/Middle Eastern, Asian/Asian American/Pacific Islander, and Multiracial.”<sup>12</sup> Faculty members who are white need not apply.



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<sup>12</sup> [https://archive.org/details/north-star\\_202503/mode/1up?view=theater](https://archive.org/details/north-star_202503/mode/1up?view=theater) (accessed March 17, 2025).

## **2024-2025 Collective Institutional Participation**

### **1. Boston University**

Source: [Link](#); [Archived Link](#)

Description: “The North Star Collective is a regional organization BU belongs to that aims to support member institutions in diversifying their faculty and retaining diverse faculty. Each year two BU faculty are chosen to participate in their annual faculty fellowship for BIPOC faculty and for 2025, Pamela Zabala Ortiz was selected as one of the fellows. Congrats Pamela!”



### **2. Bridgewater State University**

Source: [Link](#); [Archived Link](#)

Description: “Congratulations to our very own Dr. Hodel (@grrrlonfilm) for being selected as a North Star Collective Faculty Fellow for the 2024-2025 academic year!”

Now in its fourth year, the North Star Collective has awarded fellowships to 33 BIPOC faculty from across 20 member institutions in New England. This prestigious semester-long fellowship, created by BIPOC faculty for BIPOC faculty, is grounded in the principles of reparative justice. The program fosters racial trauma healing through a supportive community of care, mentorship, and professional development for Black, Indigenous, and People of Color (BIPOC) faculty across all disciplines.”

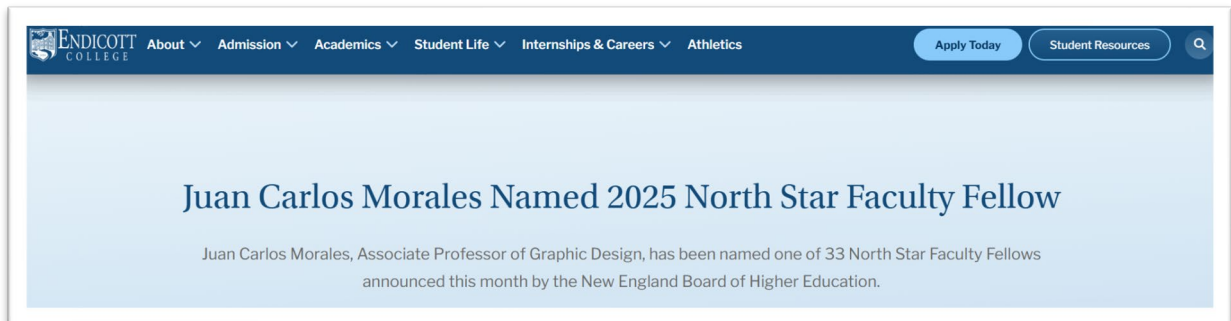




### 3. Endicott College

Source: [Link](#); [Archived Link](#)

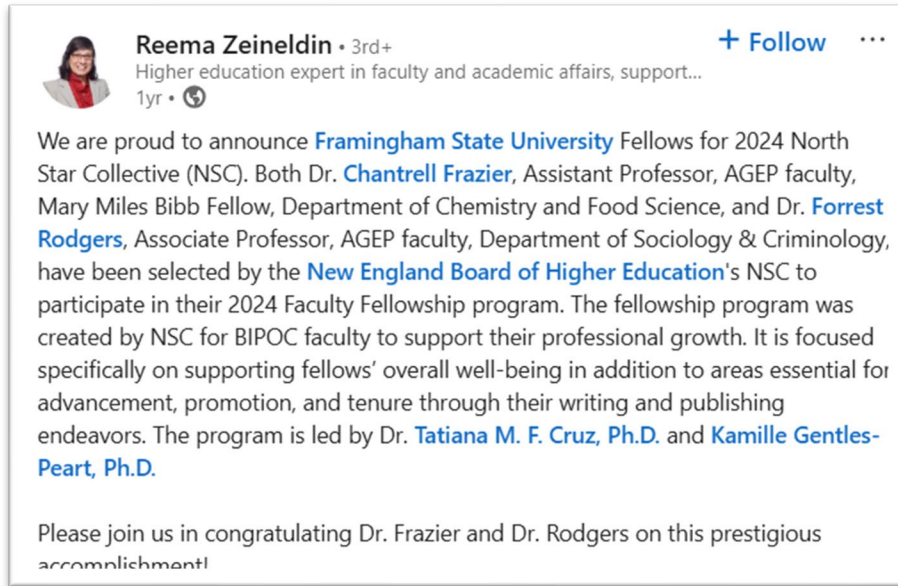
**Description:** “Juan Carlos Morales, Associate Professor of Graphic Design, has been named one of 33 North Star Faculty Fellows announced this month by the New England Board of Higher Education.”



### 4. Framingham State University

Source: [Link](#); [Archived Link](#)

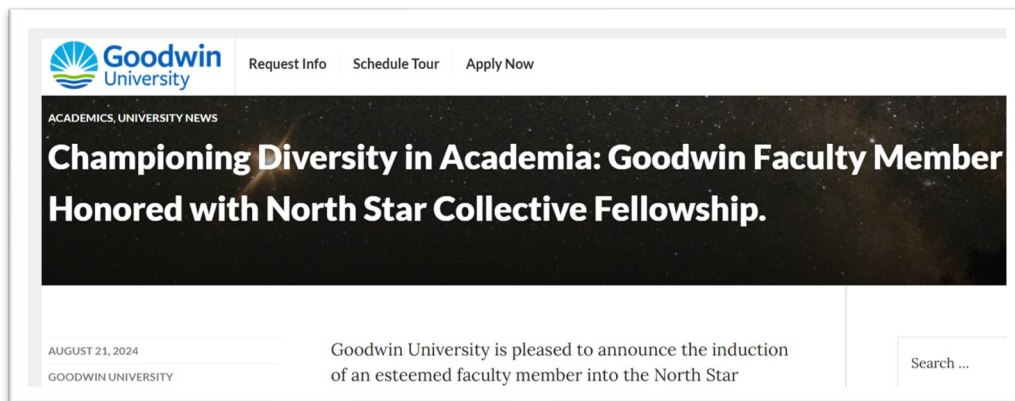
**Description:** “We are proud to announce Framingham State University Fellows for 2024 North Star Collective (NSC). Both Dr. Chantrell Frazier, Assistant Professor, AGEP faculty, Mary Miles Bibb Fellow, Department of Chemistry and Food Science, and Dr. Forrest Rodgers, Associate Professor, AGEP faculty, Department of Sociology & Criminology, have been selected by the New England Board of Higher Education's NSC to participate in their 2024 Faculty Fellowship program.”



## 5. Goodwin University

Source: [Link](#); [Archived Link](#)

Description: “Goodwin University is pleased to announce the induction of an esteemed faculty member into the North Star Collective Fellowship — Dr. Ebenezer Afarikumah of Goodwin University.”

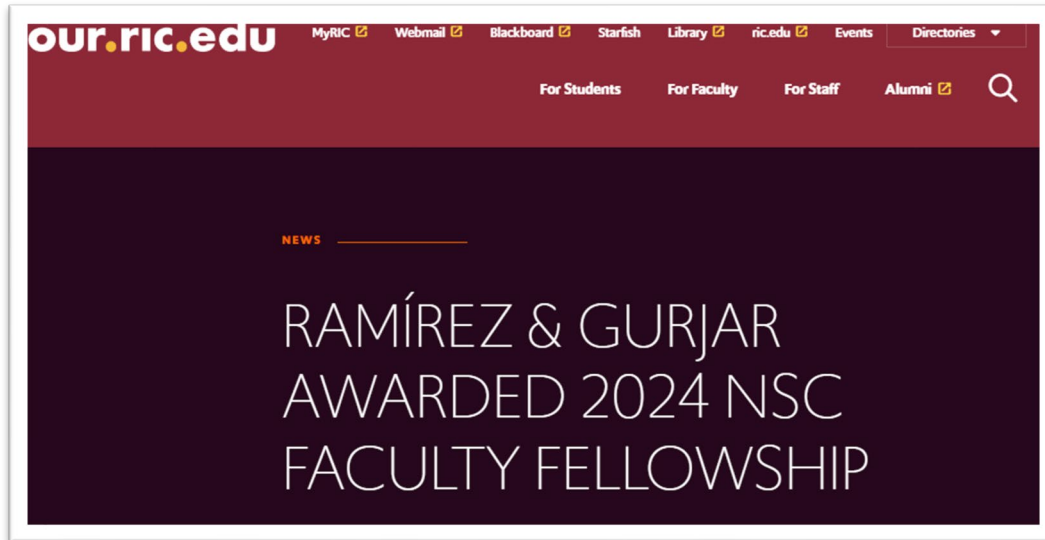


## 6. Rhode Island College

Source: [Link](#); [Archived Link](#)

Description: “RIC faculty members David Ramírez and Nandita Gurjar have been awarded the North Star Collective Faculty Fellowship by the New England Board of Higher Education

(NEBHE). This fellowship was created by BIPOC faculty for BIPOC faculty to support professional development.”



## 7. Roger Williams University

Source: [Link](#); [Archived Link](#)

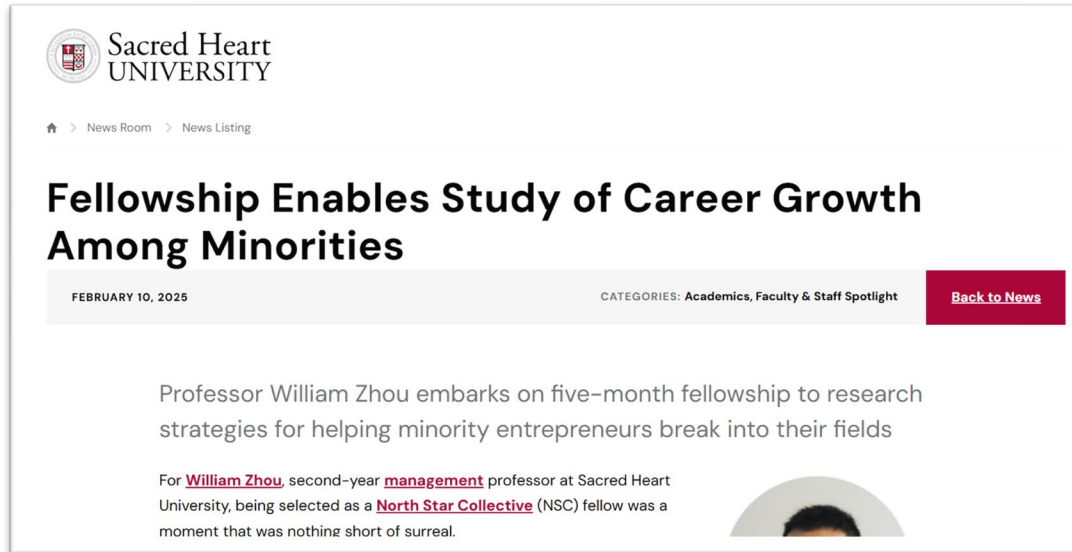
**Description:** “Assistant Professor of Construction Management Jung Hyun Lee has been named to the North Star Collective Faculty Fellowship’s latest cohort, recognizing her academic achievements and positioning her as a leader committed to advancing diversity and inclusion within academia.”



## 8. Sacred Heart University

Source: [Link](#); [Archived Link](#)

Description: “For William Zhou, second-year management professor at Sacred Heart University, being selected as a North Star Collective (NSC) fellow was a moment that was nothing short of surreal.”



The screenshot shows a news article from Sacred Heart University. The header includes the university's logo and name. Below the header, there is a breadcrumb trail: Home > News Room > News Listing. The main title of the article is "Fellowship Enables Study of Career Growth Among Minorities". The date is February 10, 2025. The categories are "Academics, Faculty & Staff Spotlight". There is a "Back to News" button. The article text begins with "Professor William Zhou embarks on five-month fellowship to research strategies for helping minority entrepreneurs break into their fields". A sub-headline reads: "For [William Zhou](#), second-year [management](#) professor at Sacred Heart University, being selected as a [North Star Collective](#) (NSC) fellow was a moment that was nothing short of surreal." A partial profile picture of a man is visible on the right side of the article.

## 9. Salem State University

Source: [Link](#); [Archived Link](#)

Description: “Two Salem State University faculty have been named fellows of the New England Board of Higher Education’s North Star Faculty Fellowship, a professional development program for Black, Indigenous, People of Color (BIPOC) faculty.”



The screenshot shows the top navigation bar of the Salem State University website. The header is orange and contains the university's logo and name "Salem STATE UNIVERSITY". To the right of the logo are links for "News & Events", "A-Z Directory", "Info For" (with a dropdown arrow), and "Giving" (with a right-pointing arrow). Below the orange header is a dark blue navigation bar with white text links: "The Salem State Difference", "Academics", "Admissions and Aid", and "Campus Life".

[Home](#) > [News & Events](#) > [News](#) >

# SSU Faculty Join North Star Faculty Fellowship

Jan 23, 2025

[Contact](#)

## 10. Simmons University

Source: [Link](#); [Archived Link](#)

Description: “Now in its fourth year of operation, the North Star Collective Faculty Fellowship, which is designed to promote supportive community and racial healing for BIPOC (Black, Indigenous, and People of Color) faculty members across New England, received a record number of applicants. For spring semester 2025, two Simmons faculty members, Associate Professor of Practice Samuel Odom from the School of Social Work and Assistant Professor Don Simmons from the School of Library and Information Science, are among the fellows.”

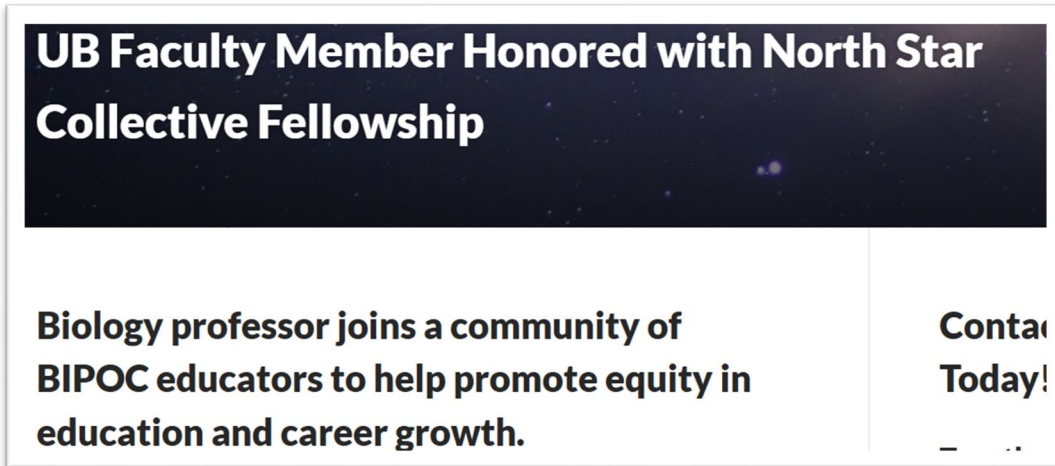


## 11. University of Bridgeport

Source: [Link](#); [Archived Link](#)

Description: “Biology professor joins a community of BIPOC educators to help promote equity in education and career growth.”





**UB Faculty Member Honored with North Star Collective Fellowship**

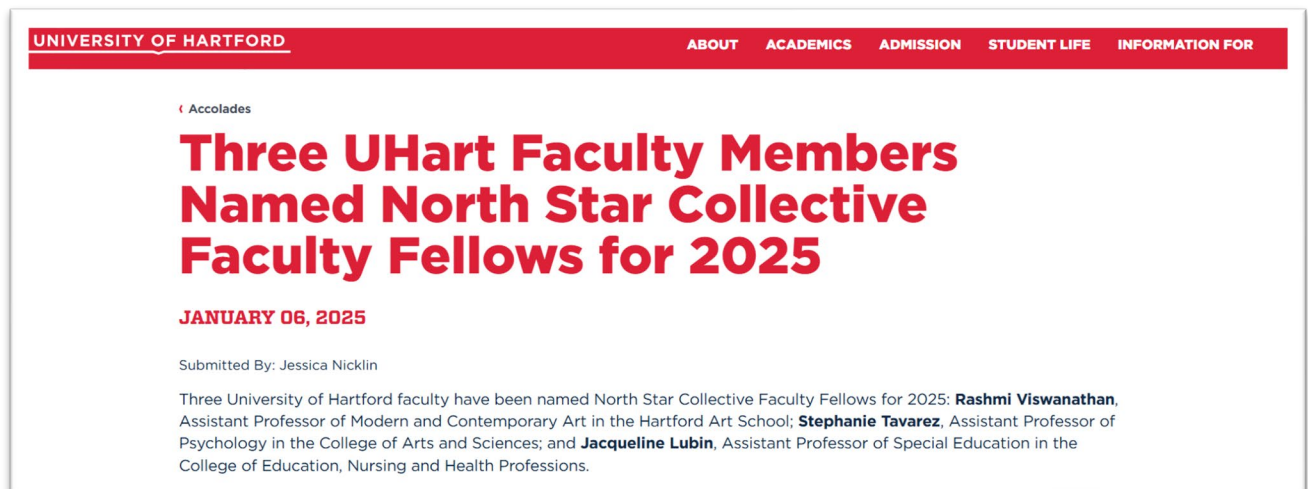
**Biology professor joins a community of BIPOC educators to help promote equity in education and career growth.**

**Contact Today!**

## 12. University of Hartford

Source: [Link](#); [Archived Link](#)

Description: “Three University of Hartford faculty have been named North Star Collective Faculty Fellows for 2025: Rashmi Viswanathan, Assistant Professor of Modern and Contemporary Art in the Hartford Art School; Stephanie Tavarez, Assistant Professor of Psychology in the College of Arts and Sciences; and Jacqueline Lubin, Assistant Professor of Special Education in the College of Education, Nursing and Health Professions.”



UNIVERSITY OF HARTFORD

ABOUT ACADEMICS ADMISSION STUDENT LIFE INFORMATION FOR

Accolades

## Three UHart Faculty Members Named North Star Collective Faculty Fellows for 2025

JANUARY 06, 2025

Submitted By: Jessica Nicklin

Three University of Hartford faculty have been named North Star Collective Faculty Fellows for 2025: **Rashmi Viswanathan**, Assistant Professor of Modern and Contemporary Art in the Hartford Art School; **Stephanie Tavarez**, Assistant Professor of Psychology in the College of Arts and Sciences; and **Jacqueline Lubin**, Assistant Professor of Special Education in the College of Education, Nursing and Health Professions.

## 13. University of Maine

Source: [Link](#); [Archived Link](#)

Description: “Dr. Stefano Tijerina has been awarded a North Star Collective Fellowship for the spring 2024 semester. Last week, he attended the first of several summits in Cape Cod. These



fellowships have been awarded to 31 BIPOC faculty from 18 institutions this semester. Created by the BIPOC faculty in New England, the fellowship promotes racial trauma healing by providing a community of care, mentorship, and professional development for faculty in all fields.”

## Faculty Success

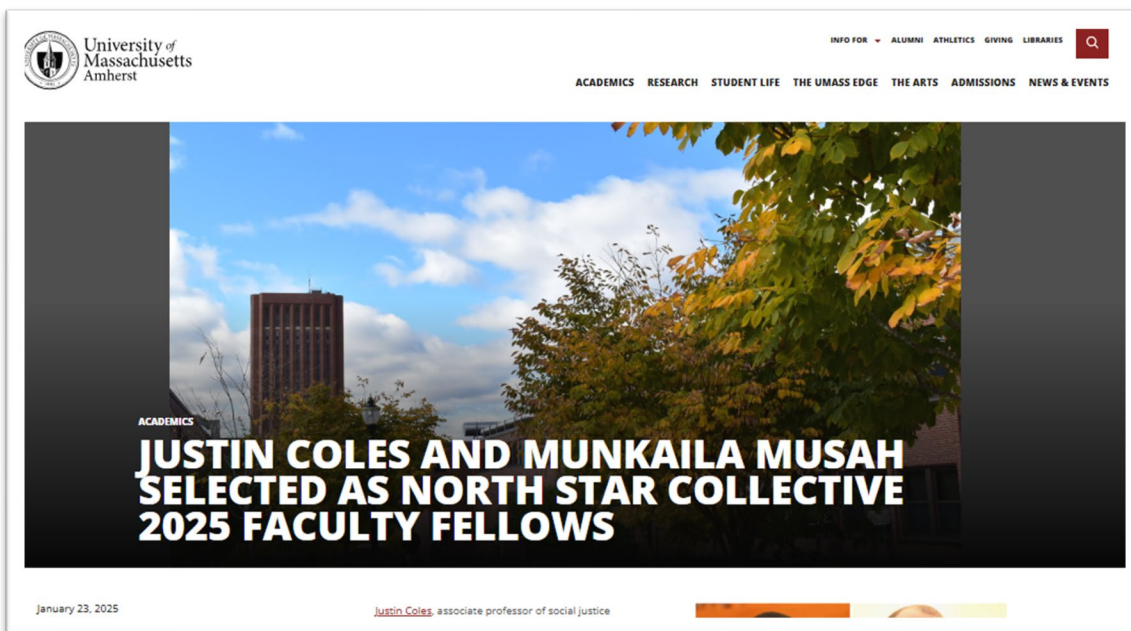
Dr. Billy Obenauer has been appointed to the executive board for the [Advancement of Replications Initiative in Management](#) (ARIM). ARIM's mission is to promote and support the conducting and publishing of replication studies by early-stage doctoral students in the field of management. This position will allow Billy to impact the development of doctoral students across the globe.

Dr. Stefano Tijerina has been awarded a [North Star Collective Fellowship](#) for the spring 2024 semester. Last week, he attended the first of several summits in Cape Cod. These fellowships have been awarded to 31 BIPOC faculty from 18 institutions this semester. Created by the BIPOC faculty in New England, the fellowship promotes racial trauma healing by providing a community of care, mentorship, and professional development for faculty in all fields.

### 14. University of Massachusetts Amherst

Source: [Link](#); [Archived Link](#)

Description: “Justin Coles, associate professor of social justice education in the College of Education’s Department of Student Development, and Munkaila Musah, assistant professor of building and construction technology in the College of Natural Sciences’ Department of Environmental Conservation, have been named members of the North Star Collective (NSC)2025 Faculty Fellowship by the New England Board of Higher Education (NEBHE).”



## 15. University of Massachusetts Boston

Source: [Link](#); [Archived Link](#)

Description: “We are pleased to share with you the latest press release from the New England Board of Higher Education (NEBHE), which announces UMASS-Boston faculty as members of the 2024 cohort.”

### North Star Collective Fellowship

#### NSC Press Release:

We are pleased to share with you the latest press release from the New England Board of Higher Education (NEBHE), which announces UMASS-Boston faculty as members of the 2024 cohort. A copy of the press release is attached. You are welcome to use information from the press release, our [NSC website](#), or [program brochure](#) in any of your communications about the Collective.

## 16. University of New Hampshire

Source: [Archived Link](#)

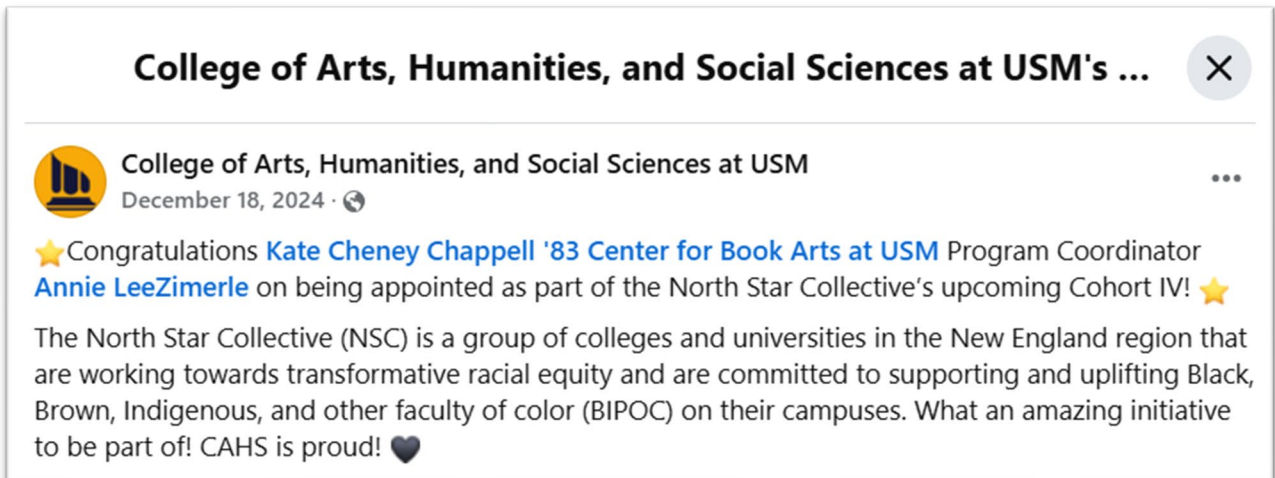
Description: “The North Star Collective 2024-2025 Institutional Members: ... University of New Hampshire.”



### 17. University of Southern Maine

Source: [Link](#); [Archived Link](#)

Description: “Congratulations Kate Cheney Chappell '83 Center for Book Arts at USM Program Coordinator Annie Lee Zimerle on being appointed as part of the North Star Collective’s upcoming Cohort IV!”



### 18. University of Vermont

Source: [Link](#); [Archived Link](#)

Description: “The North Star Collective (NSC) – New England Board of Higher Education (NEBHE) Fellowship program at UVM is a part of the Comprehensive Faculty Mentoring

Program which is run out of the office of the Vice Provost for Faculty Affairs within the Division of Faculty Affairs. For questions and more information, please contact Crispina Pincus at [Crispina.Pincus@uvm.edu](mailto:Crispina.Pincus@uvm.edu).”



## 19. Westfield State University

Source: [Archived Link](#)

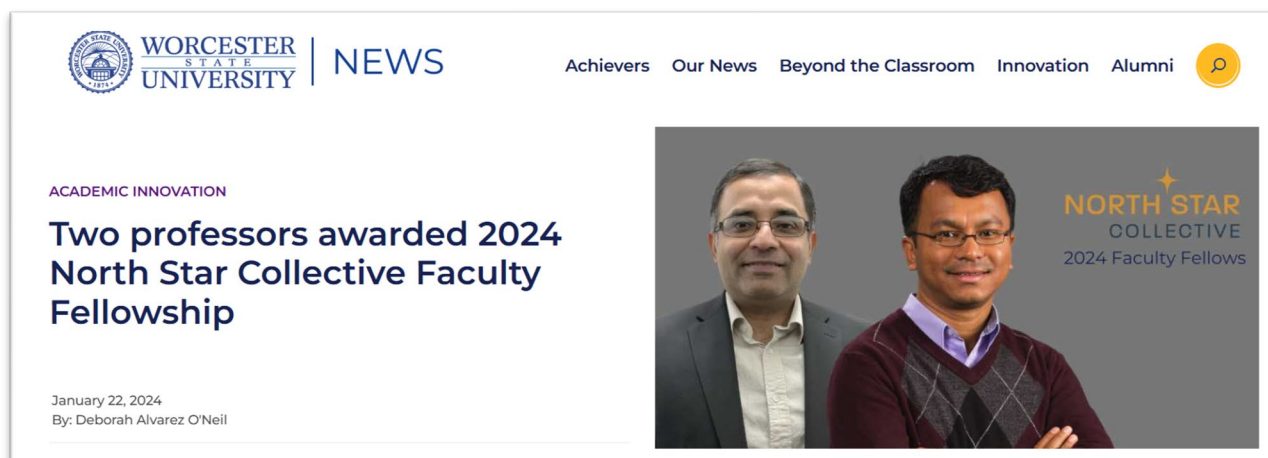
Description: “The North Star Collective 2024-2025 Institutional Members: ... Westfield State University.”



## 20. Worcester State University

Source: [Link](#); [Archived Link](#)

Description: “Two Worcester State professors from Business Administration and Earth, Environment and Physics have been selected by the New England Board of Higher Education as faculty fellows for the 2024 North Star Collective.”



### **The BIPOC Fellowship Violates Title VI**

The BIPOC Fellowship violates Title VI because it conditions eligibility for participation on a faculty member’s race and/or ethnicity.<sup>13</sup> 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 the Collective Members receive federal funds,<sup>14</sup> they are subject to Title VI.

Further, Bridgewater State University, Framingham State University, Rhode Island College, Salem State University, University of Maine, University of Massachusetts Amherst, University of Massachusetts Boston, University of New Hampshire, University of Southern Maine, University of Vermont, Westfield State University, and Worcester State University are all public universities making their involvement in the BIPOC Fellowship a violation of the Equal Protection Clause of the Fourteenth Amendment.<sup>15</sup>

In *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College*, 600 U.S. 181 (2023), the Supreme Court declared that “[e]liminating racial discrimination means

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<sup>13</sup> School sponsored or endorsed aspects of campus life that separate faculty based on race are segregationist practices that violate Title VI. *See* <https://www.ed.gov/media/document/frequently-asked-questions-about-racial-preferences-and-stereotypes-under-title-vi-of-civil-rights-act-109530.pdf>

<sup>14</sup> *See* Exhibit A.

<sup>15</sup> 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 at the Collective Member schools. 42 U.S.C. § 2000(a)(a).



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.

As OCR stated in its February 14, 2025, Civil Rights Guidance Letter<sup>16</sup>:

“Although *SFFA* addressed admissions decisions, the Supreme Court’s holding applies more broadly. At its core, the test is simple: If an educational institution treats a person of one race differently than it treats another person because of that person’s race, the educational institution violates the law. Federal law thus prohibits covered entities from using race in decisions pertaining to admissions, hiring, promotion, compensation, financial aid, scholarships, prizes, administrative support, discipline, housing, graduation ceremonies, and all other aspects of student, academic, and campus life. Put simply, educational institutions may neither separate or segregate students based on race, nor distribute benefits or burdens based on race.”

Regardless of the BIPOC Fellowship’s reasons for offering, promoting, and administering such a discriminatory fellowship, the Collective Members 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*, 600 U.S. at 289 (Gorsuch, J., concurring).

Because the Collective Members’ racial and/or ethnicity-based requirements for the BIPOC Fellowship are presumptively invalid, the use of such criteria violates federal civil rights statutes.

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<sup>16</sup> See United States Department of Education Office for Civil Rights Letter (2025), <https://www.ed.gov/media/document/dear-colleague-letter-sffa-v-harvard-109506.pdf> [<https://archive.is/R62P1>] (“At its core, the test is simple: If an educational institution treats a person of one race differently than it treats another person because of that person’s race, the educational institution violates the law.”)



### **OCR Has Jurisdiction**

OCR has jurisdiction over this complaint. The Collective is made up of twenty (20) institutions, who all receive federal funding, including from the Department of Education.<sup>17</sup>

### **The Complaint is Timely**

This complaint is timely brought because it includes allegations of discrimination based on race, color, and/or national origin, that occurred within the last 180 days and are ongoing. The BIPOC Fellowship is currently ongoing.<sup>18</sup>

### **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. 469, 505 (1989). This is true regardless of which race suffers discrimination. Race- color- and nationality-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*, 600 U.S. at 287 (Thomas, J., concurring).

Because the discriminatory eligibility criteria of the BIPOC Fellowship are presumptively invalid, and because the Collective Members cannot show any justification for these restrictions, the limitation of this program based on race and ethnicity violates federal civil rights statutes.

The Office for Civil Rights has the power and obligation to investigate the member schools’ role in promoting and administering this fellowship 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,” the Supreme Court has taught, “is to stop discriminating[.]” *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007).

Accordingly, we respectfully ask that the Department of Education’s Office for Civil Rights open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from the Collective based on discriminatory criteria and ensure that all ongoing and future programming through the member schools comports with the Constitution and federal civil rights laws.

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<sup>17</sup> See Exhibit A.

<sup>18</sup> See <https://www.umass.edu/provost/news/justin-coles-and-munkaila-musah-selected-north-star-collective-2025-faculty-fellows> [<https://archive.is/wip/LoEjT>] (accessed March 15, 2025).

U.S. Dept. of Education, Office for Civil Rights  
Civil Rights Complaint – North Star Collective Members  
March 19, 2025  
Page 22 of 25

Respectfully submitted,

*/William A. Jacobson/*

William A. Jacobson  
*President*  
Legal Insurrection Foundation  
[Contact@legalinsurrection.com](mailto:Contact@legalinsurrection.com)

*/Robert J. Fox/*

Robert J. Fox  
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# Exhibit A

## Federal Funding of Collective Members

### **1. Boston University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **2. Bridgewater State University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **3. Endicott College**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **4. Framingham State University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **5. Goodwin University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **6. Rhode Island College**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **7. Roger Williams University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

### **8. Sacred Heart University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **9. Salem State University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **10. Simmons University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **11. University of Bridgeport**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **12. University of Hartford**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **13. University of Maine**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **14. University of Massachusetts Amherst**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **15. University of Massachusetts Boston**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

#### **16. University of New Hampshire**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

**17. University of Southern Maine**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

**18. University of Vermont**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

**19. Westfield State University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)

**20. Worcester State University**

Federal Funding: [Link](#); [Archived Link](#)

Department of Education Funding: [Link](#); [Archived Link](#)