



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

April 15, 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)

U.S. Department of Education  
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 Westfield State University**  
**Regarding Discriminatory Scholarship Programs**

Dear Mr. Trainor and OCR Staff:

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.<sup>1</sup> 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 Westfield State University ("Westfield State"), a public university, for discrimination in six (6) scholarships based on race, color, national origin, or sex, in violation of Title VI and Title IX, respectively.

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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.

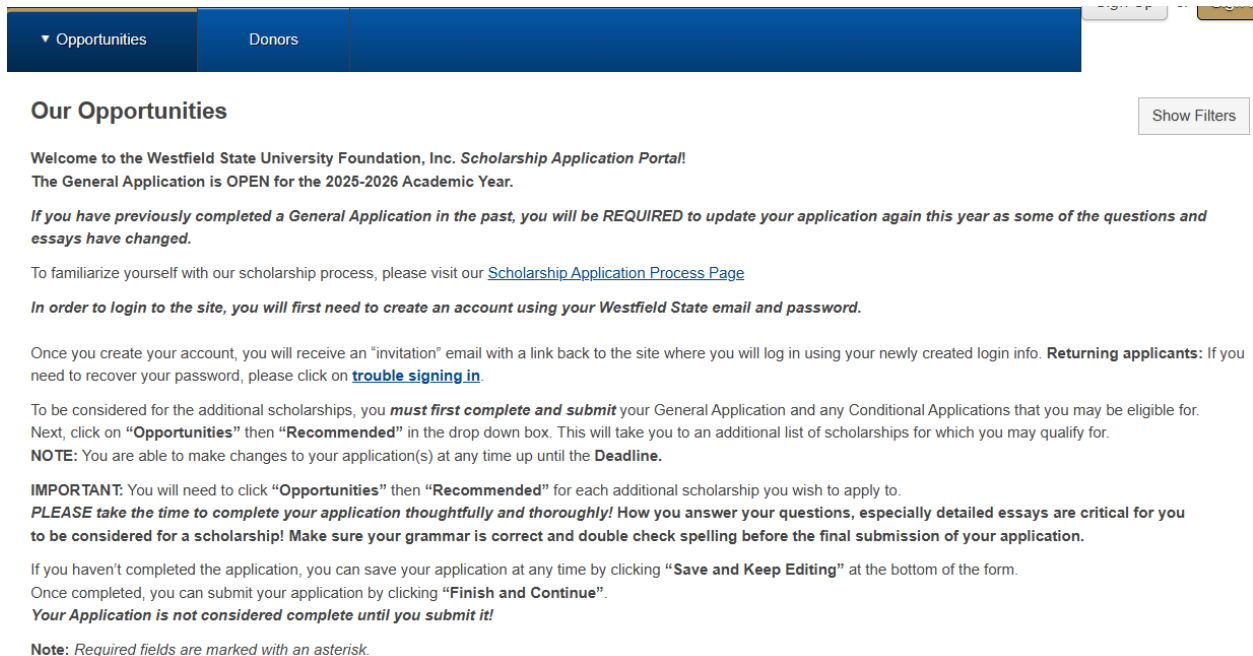
Westfield State offers a variety of internal scholarships through their “Westfield State Foundation.”<sup>2</sup> These scholarships “celebrate diverse experiences and interests.”

## Funding Your Education: Scholarship Resources

Finding the right financial support for your education can make a big difference. This scholarship page is here to help you access a variety of funding opportunities. These resources can help make your educational goals a reality.

Whether you’re searching for merit scholarships that reward your hard work or STEM scholarships for science and technology majors, we’ve got you covered. You’ll also find Foundation scholarships that celebrate diverse experiences and interests, as well as information on external private scholarships from various organizations.

To apply, students must log in using their Westfield State email and password.<sup>3</sup> To be considered for any scholarship, students must first submit the Westfield State general scholarship application. Certain scholarships will require applicants to submit additional materials.



▼ Opportunities Donors

### Our Opportunities Show Filters

Welcome to the Westfield State University Foundation, Inc. *Scholarship Application Portal!*  
The General Application is OPEN for the 2025-2026 Academic Year.

*If you have previously completed a General Application in the past, you will be REQUIRED to update your application again this year as some of the questions and essays have changed.*

To familiarize yourself with our scholarship process, please visit our [Scholarship Application Process Page](#)

*In order to login to the site, you will first need to create an account using your Westfield State email and password.*

Once you create your account, you will receive an “invitation” email with a link back to the site where you will log in using your newly created login info. **Returning applicants:** If you need to recover your password, please click on [trouble signing in](#).

To be considered for the additional scholarships, you **must first complete and submit** your General Application and any Conditional Applications that you may be eligible for. Next, click on “**Opportunities**” then “**Recommended**” in the drop down box. This will take you to an additional list of scholarships for which you may qualify for.

**NOTE:** You are able to make changes to your application(s) at any time up until the **Deadline**.

**IMPORTANT:** You will need to click “**Opportunities**” then “**Recommended**” for each additional scholarship you wish to apply to.

**PLEASE take the time to complete your application thoughtfully and thoroughly!** How you answer your questions, especially detailed essays are critical for you to be considered for a scholarship! Make sure your grammar is correct and double check spelling before the final submission of your application.

If you haven’t completed the application, you can save your application at any time by clicking “**Save and Keep Editing**” at the bottom of the form.

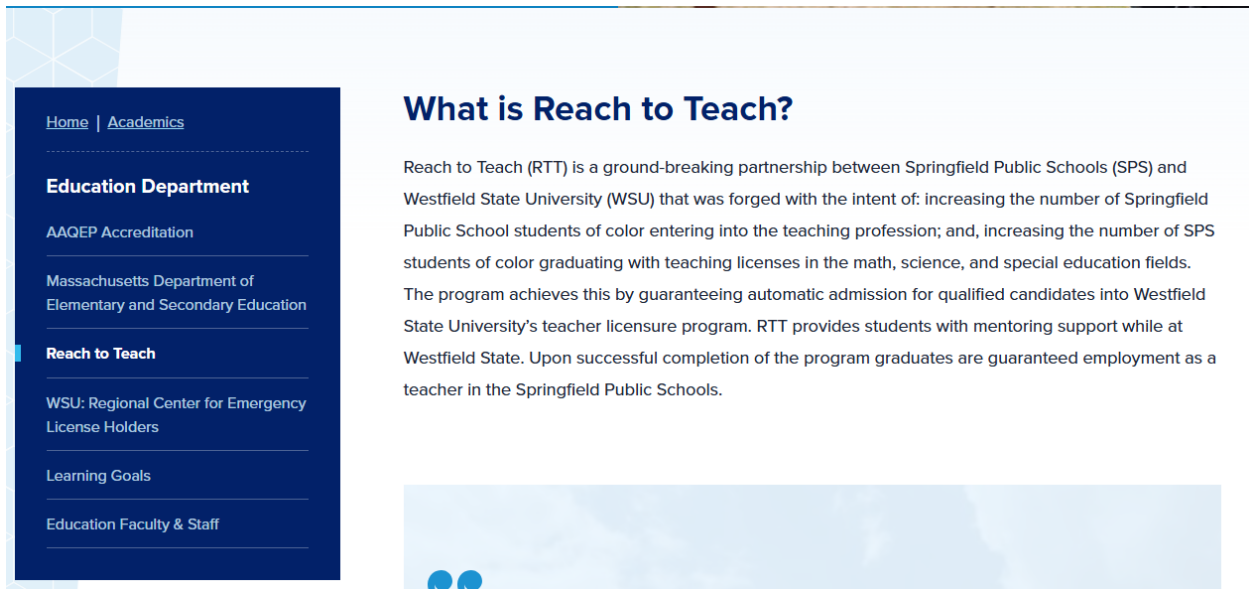
Once completed, you can submit your application by clicking “**Finish and Continue**”.

**Your Application is not considered complete until you submit it!**

**Note:** Required fields are marked with an asterisk.

<sup>2</sup> <https://www.westfield.ma.edu/cost-aid/scholarships> [<https://archive.is/wip/dBTEI>] (accessed April 14, 2025).

<sup>3</sup> <https://westfield.academicworks.com/opportunities> [<https://archive.is/wip/SrW17>] (accessed April 14, 2025).



The scholarships listed below are currently offered to Westfield State students and applicants for admission, according to the Westfield State website, and violate Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations<sup>4</sup> by illegally excluding students based on their race and skin color or Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations<sup>5</sup> by excluding students based on their sex. Because Westfield State is a public university, these discriminatory scholarships also violate the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution.<sup>6</sup>

Each of the scholarships listed below are available for the 2025-2026 school year, with applications closed as of March 23, 2025:

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<sup>4</sup> 42 U.S.C. § 2000d et seq.; 28 C.F.R. Part 100.

<sup>5</sup> 20 U.S.C. § 1681 et seq.; 34 C.F.R. Part 106.

<sup>6</sup> This Civil Rights Complaint is unrelated to Westfield’s participation in the NorthStar Collective BIPOC Fellowship, as to which EPP filed a Civil Rights Complaint on March 19, 2025. See, <https://equalprotect.org/wp-content/uploads/2025/03/OCR-Complaint-North-Star-Collective-Institutional-Members.pdf>

## SCHOLARSHIPS THAT VIOLATE TITLE VI (4)

### 1. **Landrau/Martinez Scholarship Fund: Reach to Teach Partnership**<sup>7</sup>

Link: <https://westfield.academicworks.com/opportunities/2656>

Archived Link: <https://archive.ph/wip/8fVGk>

Discriminatory Requirement: “To provide funds for **Latino students** from the Springfield Public Schools enrolled as Education majors.”

| ▼ Opportunities   | Donors |
|---|--------|
| <h3>Landrau/Martinez Scholarship Fund: Reach to Teach Partnership</h3> <p>To provide funds for Latino students from the Springfield Public Schools enrolled as Education majors. Students will participate in the <i>Reach to Teach</i> program and upon graduation, intend to pursue a teaching position within the Springfield Public School System.</p> <ul style="list-style-type: none"><li>• Must be full-time pursuing a degree in Education (Elementary Ed, Science, Math or Special Education).</li><li>• Must be a student who graduated from the Springfield Public Schools</li><li>• Participate in the <i>Reach to Teach</i> Program</li></ul> |        |
| <hr/>   |        |
| <b>Donor</b><br><a href="#">The Landrau/Martinez Scholarship Fund: Reach to Teach Partnership</a>   |        |
| <b>Award</b><br>Varies  |        |
| <b>Departments</b><br>Majoring in Education, Incoming Freshman  |        |
| <b>Deadline</b><br>03/23/2025   |        |
| <b>Supplemental Questions</b> <ol style="list-style-type: none"><li>1. Did you attend a public high school in Springfield, MA?</li><li>2. If yes, what is the name of the high school?</li><li>3. Are you a participant in the Reach to Teach Program?</li><li>4. Are you of Latin American origin or descent?</li><li>5. Is your goal to become a teacher after graduation?</li></ol>  |        |

### 2. **Veta Daley Scholarship: Reach to Teach Partnership**

Link: <https://westfield.academicworks.com/opportunities/2679>

Archived Link: <https://archive.ph/wip/V0W9g>

Discriminatory Requirement: “Applicant must be **African American or Caribbean American** student who graduated from the Springfield Public Schools.”

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<sup>7</sup> Two of the scholarships, the Landrau/Martinez Scholarship Fund: Reach to Teach Partnership and the Veta Daley Scholarship: Reach to Teach Partnership scholarships are related to Westfield State’s Reach to Teach program <https://www.westfield.ma.edu/academics/education-department/reach-teach> [<https://archive.ph/wip/D2vPj>] (accessed April 14, 2025).

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| ▼ Opportunities | Donors |
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### Veta Daley Scholarship: Reach to Teach Partnership

The Veta Daley Scholarship: Reach to Teach Partnership was established by the Daley family to provide support for African American or Caribbean American students from the Springfield, MA Public Schools so they may pursue a degree in Education at Westfield State. Students will be a participant in the *Reach to Teach* Program, a ground-breaking partnership between the Springfield Public Schools and Westfield State University to provide a pathway to those students who will upon graduation, intend to teach in the Springfield Public School system.

\*Applicant must be a full-time student pursuing a degree in Education: Elementary Education, Science, Math or Special Education  
\*Applicant must be African American or Caribbean American student who graduated from the Springfield Public Schools  
\*Applicant will participate in the *Reach to Teach* Program

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**Donor**  
[The Veta Daley Scholarship Fund: Reach to Teach Partnership](#)

**Award**  
Varies

**Departments**  
Majoring in Education

**Deadline**  
03/23/2025

**Supplemental Questions**

1. Did you graduate from the Springfield Public School System?
2. If YES, what is the name of the High School?
3. Are you a participant in the Reach to Teach Program?

### 3. **Dr. Terrell M. Hill “Leader for Change” Scholarship**

Link: <https://westfield.academicworks.com/opportunities/2667>

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

Discriminatory Requirement: “This scholarship was established by Dr. Hill to help underrepresented **minority students** achieve their dream of receiving a college education.”

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| ▼ Opportunities | Donors |
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### Dr. Terrell M. Hill "Leader for Change" Scholarship

As Dr. Terrell Hill describes this scholarship from the lives of Jimmy and Pearlina Mayweather (Terrell's maternal grandparents): *"As a slave cropper since elementary school age, my grandfather always dreamed of a better life for his lineage."*

This scholarship was established by Dr. Hill to help underrepresented minority students achieve their dream of receiving a college education.

- Preference given to first generation students and those with the greatest financial need.

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**Donor**  
[The Dr. Terrell M. Hill "Leader for Change" Scholarship](#)

**Award**  
Varies

**Deadline**  
03/23/2025

4. **Victor and Mariellen Quillard Scholarship**

Link: <https://westfield.academicworks.com/opportunities/2527>

Archived Link: [archive.ph/wip/D0iUU](https://archive.ph/wip/D0iUU)

**Discriminatory Requirement:** “This scholarship was established to provide support to **Hispanic/Latino students** from Holyoke, MA transferring into Westfield State University from Holyoke Community College.”

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| ▼ Opportunities | Donors |
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**Victor and Mariellen Quillard Scholarship**

This scholarship was established to provide support to Hispanic/Latino students from Holyoke, MA transferring into Westfield State University from Holyoke Community College.

\*Preference given to Holyoke, MA residents of Hispanic/Latino descent.  
\*Preference given to students who are enrolling in and maintain a minimum of 12 credit hours per semester  
\*Preference given to students who earned a minimum GPA of 2.75 or higher and must maintain this minimum to be eligible to continue to receive this scholarship  
\*Should candidates of this scholarship continue to meet the criteria, they are eligible to receive the scholarship for a second year.

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**Donor**  
[The Victor and Mariellen Quillard Scholarship](#)

**Award**  
Varies

**Departments**  
Transfer Student

**Deadline**  
03/23/2025

**SCHOLARSHIPS THAT VIOLATE TITLE IX (2)**

5. **BJ Bourdon/ Zonta Scholarship**

Link: <https://westfield.academicworks.com/opportunities/2586>

Archived Link: <https://archive.ph/wip/CE0Jj>

**Discriminatory Requirement:** “Applicant must be a **non-traditional female student** with a business major in business Economics/ Management.”

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| ▼ Opportunities | Donors |
|-----------------|--------|

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**BJ Bourdon/ Zonta Scholarship**

Applicant must be a non-traditional female student with a business major in business Economics/ Management. Applicant must maintain a GPA of 3.0 or higher. Essay will include why you chose to be a Business Major and what your future plans are.

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**Donor**  
[The B.J. Bourdon Zonta Scholarship](#)

**Award**  
Varies

**Departments**  
Business and Accounting, Majoring in Economics and Management

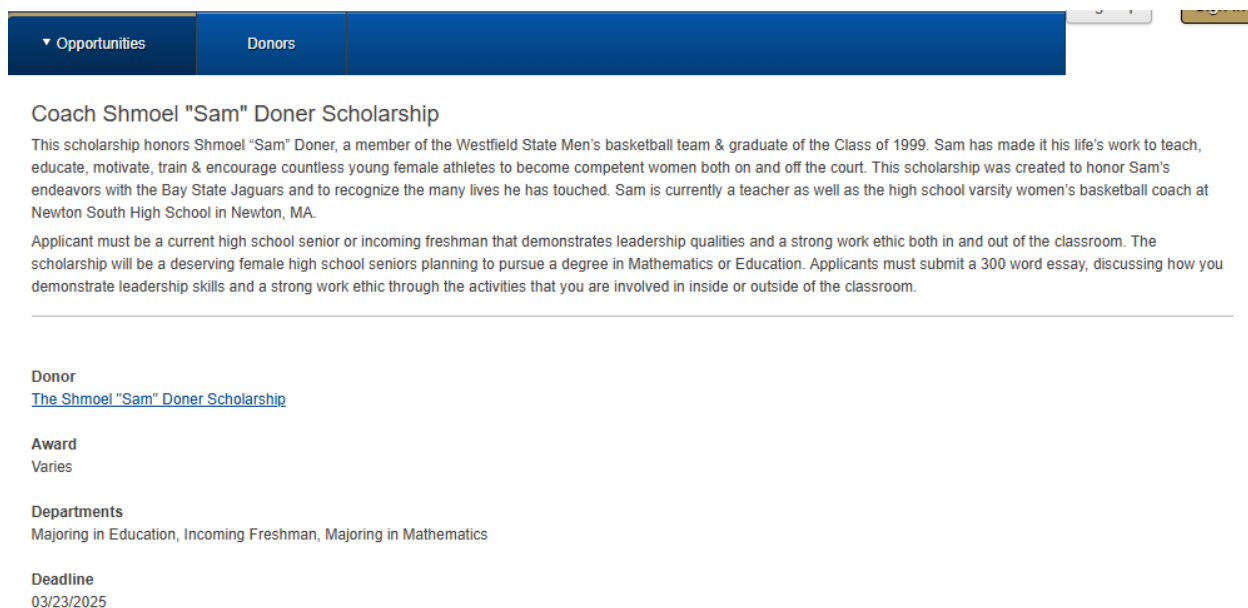
**Deadline**  
03/23/2025

6. **Coach Shmoel “Sam” Doner Scholarship**

Link: <https://westfield.academicworks.com/opportunities/2639>

Archived Link: <https://archive.ph/wip/dT53V>

**Discriminatory Requirement:** “The scholarship will be a deserving **female high school seniors** (sic) planning to pursue a degree in Mathematics or Education.”



▼ Opportunities Donors

### Coach Shmoel "Sam" Doner Scholarship

This scholarship honors Shmoel "Sam" Doner, a member of the Westfield State Men's basketball team & graduate of the Class of 1999. Sam has made it his life's work to teach, educate, motivate, train & encourage countless young female athletes to become competent women both on and off the court. This scholarship was created to honor Sam's endeavors with the Bay State Jaguars and to recognize the many lives he has touched. Sam is currently a teacher as well as the high school varsity women's basketball coach at Newton South High School in Newton, MA.

Applicant must be a current high school senior or incoming freshman that demonstrates leadership qualities and a strong work ethic both in and out of the classroom. The scholarship will be a deserving female high school seniors planning to pursue a degree in Mathematics or Education. Applicants must submit a 300 word essay, discussing how you demonstrate leadership skills and a strong work ethic through the activities that you are involved in inside or outside of the classroom.

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**Donor**  
[The Shmoel "Sam" Doner Scholarship](#)

**Award**  
Varies

**Departments**  
Majoring in Education, Incoming Freshman, Majoring in Mathematics

**Deadline**  
03/23/2025

**The Scholarships Listed Above Violate The Law**

The scholarships identified above violate either Title VI, by discriminating on the basis of race, skin color, or national origin, or Title IX, by discriminating on the basis of sex.<sup>8</sup> Furthermore, because Westfield State is a public university, 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,”

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<sup>8</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 Westfield State. 42 U.S.C. § 2000(a)(a). These scholarships also violate Massachusetts state law. Mass. Gen. Laws ch. 151C, § 1 et seq. (2024). Finally, these scholarships violate Westfield State’s own nondiscrimination policy. *See* <https://www.westfield.ma.edu/offices/hr-titleix-eo/title-ix> [<https://archive.is/wip/lapsv>] (accessed April 14, 2025).



and therefore applies to universities receiving federal financial assistance. Because Westfield State receives and administers federal funds through numerous programs and is a public institution, it is subject to Title VI.<sup>9</sup>

Regardless of Westfield State's reasons for offering, promoting, and administering such discriminatory scholarships, it is 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 Westfield State is a public university, its offering, promoting, and administering these discriminatory scholarships 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 at issue here cannot withstand that exacting standard.

As OCR stated in its February 14, 2025, Civil Rights Guidance Letter<sup>10</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

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<sup>9</sup> See <https://www.usaspending.gov/recipient/75bc7cd6-5b4e-f634-9bdc-ec33feef4ba9-C/latest> [<https://archive.is/oN3NC>] (accessed on April 14, 2025).

<sup>10</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.")



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.

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, Westfield State 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, Westfield State 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 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 Westfield State’s scholarships were “imprecise,” “plainly overbroad,” “arbitrary,”

“undefined” and “opaque,” 600 U.S. at 216-17,<sup>11</sup> 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 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.

Westfield State’s explicit race, ethnicity, national origin, and/or sex-based scholarships are presumptively invalid, and since there is no compelling government justification for such invidious discrimination, Westfield State’s offering, promotion, and administration of these programs violates state and federal civil rights statutes and constitutional equal protection guarantees.

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<sup>11</sup> In his concurrence, Justice Thomas criticizes these categories as being “artificial.” *Students for Fair Admissions*, 600 U.S. at 276 (Thomas, J., concurring).

### **OCR Has Jurisdiction**

Westfield State is a public entity and a recipient of federal funds,<sup>12</sup> including from the U.S. Department of Education.<sup>13</sup> It is therefore liable for violating Title VI, Title IX, and the Equal Protection Clause, and OCR therefore has jurisdiction over this complaint.

### **The Complaint Is Timely**

This complaint is timely brought because it includes allegations of discrimination based on race, color, national origin, and/or sex that occurred within 180 days and that is ongoing. According to the Westfield State scholarship website, the applications for these scholarships closed on March 23, 2025.<sup>14</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. 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 Westfield State cannot show any compelling government justification for it, the fact that it conditions eligibility for multiple scholarships on race, color, national origin, and sex violates federal civil rights statutes and constitutional equal protection guarantees.

The Office for Civil Rights has the power and obligation to investigate Westfield State’s role in creating, funding, promoting and administering these scholarships 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.

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<sup>12</sup> See <https://www.usaspending.gov/recipient/75bc7cd6-5b4e-f634-9bdc-ec33feef4ba9-C/latest> [<https://archive.is/oN3NC>] (accessed on April 14, 2025).

<sup>13</sup> See [https://www.usaspending.gov/award/ASST\\_NON\\_P042A200281\\_9100](https://www.usaspending.gov/award/ASST_NON_P042A200281_9100) [<https://archive.ph/wip/VMQ8j>] (accessed on April 14, 2025).

<sup>14</sup> <https://westfield.academicworks.com/opportunities/2639> [<https://archive.ph/dT53V>] (accessed April 14, 2025).

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Civil Rights Complaint Against Westfield State University  
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Accordingly, we respectfully ask that the Department of Education's Office for Civil Rights promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from Westfield State's various scholarships based on discriminatory criteria, and ensure that all ongoing and future scholarships and programming at Westfield State comports with the Constitution and federal civil rights laws.

Respectfully submitted,

*/William A. Jacobson/*

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