



THE EQUAL PROTECTION PROJECT
A Project of the Legal Insurrection Foundation
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May 21, 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.DC@ed.gov)

Washington DC (Metro)
Office for Civil Rights
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-1475

**Re: Civil Rights Complaint Against Bowdoin College
Regarding Discriminatory Scholarships**

Dear 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.¹ We write on behalf of the Equal Protection Project of the Legal Insurrection Foundation, a non-profit entity that, among other things, seeks to ensure equal protection under the law and opposes unlawful discrimination in any form.

We bring this civil rights complaint against Bowdoin College ("Bowdoin"), a private college, for discrimination in eighteen (18) scholarships and programs based on race, color, or national origin, based on sex, or both, in violation of Title VI and Title IX, respectively.

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

Most Bowdoin scholarships do not require a separate application.² Instead, students are automatically considered based on their completed General Application. “Bowdoin uses information from the CSS Profile to determine each student's eligibility for financial aid.”

Types of Aid

Bowdoin meets every admitted student's full demonstrated need with an on-campus work expectation and scholarships, and there are several other resources families may use to help pay their share of college costs.

Bowdoin uses information from the CSS Profile to determine each student's eligibility for financial aid. We analyze each family's income, assets, and household information to determine an appropriate family contribution. We then subtract the family contribution from the [cost of attendance](#) and meet the difference with a \$2 400 on-campus work expectation and

There are three primary types of financial aid, and it's important to know what they mean:

- **Scholarships and Grants:** These funds are a gift and do not need to be repaid

The scholarships listed below³ are currently active according to the Bowdoin website, and violate Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations⁴ by excluding students based on their race, color, or national origin, while other scholarships violate Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations⁵ by excluding students based on their sex:

² <https://www.bowdoin.edu/student-aid/types-of-aid/index.html> [<https://archive.ph/wip/isTzz>] (accessed May 18, 2025).

³ Discriminatory criteria highlighted throughout.

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

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

I. SCHOLARSHIPS AND PROGRAMS THAT VIOLATE TITLE VI (8)

1. Alice G. and Frederick W. Titus Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/41058>

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

Discriminatory Requirement: “Preference given to **students from minority groups** who enhance the diversity of campus.”⁶

Bowdoin

[Sign In](#)

▼ Opportunities
<h3>Alice G. and Frederick W. Titus Scholarship Fund</h3> <p>Established in 1998 to provide scholarship support for Bowdoin undergraduates who are especially disadvantaged economically. Preference given to students from minority groups who enhance the diversity of campus.</p>
Award \$0.00
Deadline 06/30/2025
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .

⁶ Bowdoin considers the term “minority” to include Black, non-Hispanic; American Indian or Alaska Native; Asian, Native Hawaiian or other Pacific Islander, or Hispanic individuals. <https://www.bowdoin.edu/ir/pdf/common-data-set-2020-21.pdf> [<https://web.archive.org/web/20250520021359/https://www.bowdoin.edu/ir/pdf/common-data-set-2020-21.pdf>] (accessed May 19, 2025). Maine defines “Minority” as “Hispanic or Latino or Latino, Black or African American, Asian, Native Hawaiian or Pacific Islander, American Islander, American Indian or Alaska Native, Other race or Multi-racial.” <https://www.maine.gov/mdot/civilrights/docs/title6/2023/2023%20Demographic%20Profile%20of%20Maine.pdf> [<https://web.archive.org/web/20250519191513/https://www.maine.gov/mdot/civilrights/docs/title6/2023/2023%20Demographic%20Profile%20of%20Maine.pdf>] (accessed May 19, 2025). Additionally, courts often understand the term “minority” to mean non-white racial and ethnic groups. *See Boston Chapter, NAACP, Inc. v. Beecher*, 295 F. Supp. 3d 26, 28 (D. Mass. 2018); *see also Kirkland v. N.Y. State Dep’t of Corr. Servs.*, 552 F. Supp. 667, 674, 677 (S.D.N.Y. 1982); *Arbor Hill Concerned Citizens Neighborhood Ass’n v. Cnty. of Albany*, 281 F. Supp. 2d 436, 455 (N.D.N.Y. 2003); *Coalition to Defend Affirmative Action, Integration and Immigrant Rights and Fight for Equality by Any Means Necessary v. Regents of Univ. of Mich.*, 701 F.3d 466, 493 (6th Cir. 2012).

2. The Bowdoin Martin Luther King, Jr. Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/39590>

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

Discriminatory Requirement: “Preference for **minority students**.”

Bowdoin

Sign In

▼ Opportunities
<div>The Bowdoin Martin Luther King, Jr. Scholarship Fund</div> <div>Preference for minority students.</div> <hr/> <div>Award \$0.00</div> <div>Deadline 06/30/2025</div> <div>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</div>

3. David and Lauren Herter Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40644>

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

Discriminatory Requirement: “**Minority students** who enhance the College’s diversity.”

Bowdoin

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▼ Opportunities
<div>David and Lauren Herter Scholarship Fund</div> <div>Minority students who enhance the College's diversity.</div> <hr/> <div>Award \$0.00</div> <div>Deadline 06/30/2025</div> <div>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</div>

4. Herter Family Scholarship Fund for Enhanced Diversity

Link: <https://bowdoin.academicworks.com/opportunities/40543>

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

Discriminatory Requirement: “Established in 1997 to provide scholarship support for Bowdoin undergraduates, with **preference for minority students** who enhance diversity on campus”

Bowdoin

Sign In

▼ Opportunities
<p>Herter Family Scholarship Fund for Enhanced Diversity</p> <p>Established in 1997 to provide scholarship support for Bowdoin undergraduates, with preference for minority students who enhance diversity on campus</p> <hr/> <p>Award \$0.00</p> <p>Deadline 06/30/2025</p> <hr/> <p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>

5. Mary M. and David A. Dickson Scholarship

Link: <https://bowdoin.academicworks.com/opportunities/39696>

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

Discriminatory Requirement: “with **preference for minority students** from Maine or other deserving Maine residents”

Bowdoin

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▼ Opportunities
<p>Mary M. and David A. Dickson Scholarship</p> <p>Established in 1979 to provide scholarship support for Bowdoin undergraduates, with preference for minority students from Maine or other deserving Maine residents</p> <hr/> <p>Award \$0.00</p> <p>Deadline 06/30/2025</p> <hr/> <p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>

6. The Louis Berry Dodson '42 and Kimberly Foster Price '81 Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40445>

Archived Link: <https://archive.ph/wip/iKaS8>

Discriminatory Requirement: “Established in 2019 in support of scholarships to Bowdoin undergraduates with a **preference for minority or multicultural students** who enhance diversity on campus.”

Bowdoin

Sign In

▼ Opportunities

The Louis Berry Dodson '42 and Kimberly Foster Price '81 Scholarship Fund

Established in 2019 in support of scholarships to Bowdoin undergraduates with a preference for minority or multicultural students who enhance diversity on campus.

Award
\$0.00

Deadline
06/30/2025

You will be automatically considered based on your completed General Application. To complete the General Application, please [sign in](#).

7. Peter Metcalf Small Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40984>

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

Discriminatory Requirement: “Established in 1986 to provide scholarship support for Bowdoin undergraduates, **with preference for African American students**, and then to seniors demonstrating interest in teaching or library work”

Bowdoin

Sign In

▼ Opportunities

Peter Metcalf Small Scholarship Fund

Established in 1986 to provide scholarship support for Bowdoin undergraduates, with preference for African American students, and then to seniors demonstrating interest in teaching or library work

Award
\$0.00

Deadline
06/30/2025

You will be automatically considered based on your completed General Application. To complete the General Application, please [sign in](#).

8. Virgil H. Logan, Jr. Scholarship

Link: <https://bowdoin.academicworks.com/opportunities/41242>

Archived Link: <https://archive.ph/wip/dL77s>

Discriminatory Requirement: “Established in 1990 to provide scholarship support for Bowdoin undergraduates, with **preference for members of the African American Society**”

Bowdoin

Sign In

▼ Opportunities

Virgil H. Logan, Jr. Scholarship

Established in 1990 to provide scholarship support for Bowdoin undergraduates, with preference for members of the African American Society

Award
\$0.00

Deadline
06/30/2025

You will be automatically considered based on your completed General Application. To complete the General Application, please [sign in](#).

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

1. Pamela E. Herbert Memorial Scholarship

Link: <https://bowdoin.academicworks.com/opportunities/41215>

Archived Link: <https://archive.ph/wip/cEr5H>

Discriminatory Requirement: “with a preference for **female minority students**”

BowdoinSign In

▼ Opportunities

Pamela E. Herbert Memorial Scholarship

Established in 1989 to provide scholarship support for Bowdoin undergraduates with a preference for female minority students who demonstrate the personal qualities for which Pamela is so fondly remembered: a joy for life, selfless and affectionate concern

Award
\$0.00

Deadline
06/30/2025

You will be automatically considered based on your completed General Application. To complete the General Application, please [sign in](#).

III. SCHOLARSHIPS THAT VIOLATE TITLE IX (9)

1. Corey-Davies Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40645>

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

Discriminatory Requirement: “Established in 2012 with preference to **female students** from New York City or another metropolitan area who have benefitted from the services of the Children’s Aid Society or an organization with a similar mission”

Bowdoin

Sign In

▼ Opportunities	
Corey-Davies Scholarship Fund	
Established in 2012 with preference to female students from New York City or another metropolitan area who have benefitted from the services of the Children's Aid Society or an organization with a similar mission, or to female students whose parent(s) or	
Award	
\$0.00	
Deadline	
06/30/2025	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

2. **Deborah W. Wight Scholarship Fund**

Link: <https://bowdoin.academicworks.com/opportunities/41174>

Archived Link: <https://archive.ph/wip/pWs0R>

Discriminatory Requirement: “Established in 1985 to provide scholarship support for **female Bowdoin undergraduates**, with preference for Juniors or Seniors majoring in either History or English.”

Bowdoin

Sign In

▼ Opportunities	
Deborah W. Wight Scholarship Fund	
Established in 1985 to provide scholarship support for female Bowdoin undergraduates, with preference for Juniors or Seniors majoring in either History or English	
Award	
\$0.00	
Deadline	
06/30/2025	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

3. Donald F. and Margaret Gallagher Barnes Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40954>

Archived Link: <https://archive.ph/wip/h5zbD>

Discriminatory Requirement: “**Female**”

Bowdoin

Sign In

▼ Opportunities	
Donald F. and Margaret Gallagher Barnes Scholarship Fund	
Female	
<hr/>	
Award	
\$0.00	
Deadline	
06/30/2025	
<hr/>	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

4. Joan Benoit Samuelson '79, P'12 Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40385>

Archived Link: <https://archive.ph/wip/4FrQf>

Discriminatory Requirement: “Established in 2021 to support scholarships for Bowdoin undergraduates with preference for **female students** who are interested in the outdoors, the environment, or climate change.”

Bowdoin

Sign In

▼ Opportunities	
<h3>Joan Benoit Samuelson '79, P'12 Scholarship Fund</h3> <p>Established in 2021 to support scholarships for Bowdoin undergraduates with preference for female students who are interested in the outdoors, the environment, or climate change.</p>	
<hr/>	
Award	
\$0.00	
Deadline	
06/30/2025	
<hr/>	
<p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

5. **Kim Rubey and Nate Bride '93 Scholarship Fund**

Link: <https://bowdoin.academicworks.com/opportunities/41011>

Archived Link: <https://archive.ph/wip/Iq34e>

Discriminatory Requirement: “Established in 2021 to provide scholarship support to Bowdoin undergraduates with **preference for female students** from underrepresented backgrounds or cultures.”

Bowdoin

Sign In

▼ Opportunities	
<h3>Kim Rubey and Nate Bride '93 Scholarship Fund</h3> <p>Established in 2021 to provide scholarship support to Bowdoin undergraduates with preference for female students from underrepresented backgrounds or cultures.</p>	
<hr/>	
Award	
\$0.00	
Deadline	
06/30/2025	
<hr/>	
<p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

6. Philip S. and Elisabeth C. Wilder Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40340>

Archived Link: <https://archive.is/wip/t6wVd>

Discriminatory Requirement: “Established in 1973 to provide scholarship support for **female Bowdoin undergraduates**”

Bowdoin

Sign In

▼ Opportunities	
Philip S. and Elisabeth C. Wilder Scholarship Fund Established in 1973 to provide scholarship support for female Bowdoin undergraduates	
<hr/>	
Award	
\$0.00	
Deadline	
06/30/2025	
<hr/>	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

7. Shelly Chessie Miller Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/40244>

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

Discriminatory Requirement: “Established in 2021 to provide scholarship support to Bowdoin undergraduates with first preference to **female student** from Canada, and second preference for any student from Canada.”

Bowdoin

Sign In

▼ Opportunities	
<h3>Shelly Chessie Miller Scholarship Fund</h3> <p>Established in 2021 to provide scholarship support to Bowdoin undergraduates with first preference to female student from Canada, and second preference for any student from Canada.</p>	
<hr/>	
Award	\$0.00
Deadline	06/30/2025
<hr/>	
<p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

8. Society of Bowdoin Women Foundation Scholarship

Link: <https://bowdoin.academicworks.com/opportunities/39709>

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

Discriminatory Requirement: “Established in 1971 to provide scholarship support for Bowdoin undergraduates \$1,000 awards to **female students**”

Bowdoin

Sign In

▼ Opportunities	
<h3>Society of Bowdoin Women Foundation Scholarship</h3> <p>Established in 1971 to provide scholarship support for Bowdoin undergraduates \$1,000 awards to female students</p>	
<hr/>	
Award	\$0.00
Deadline	06/30/2025
<hr/>	
<p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

9. Sweeney Family Scholarship Fund

Link: <https://bowdoin.academicworks.com/opportunities/39709>

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

Discriminatory Requirement: “Established in 2019 in support of scholarships to Bowdoin undergraduates with a preference for **female students** who have an interest in technology.”

Bowdoin

Sign In

▼ Opportunities	
<h3>Sweeney Family Scholarship Fund</h3> <p>Established in 2019 in support of scholarships to Bowdoin undergraduates with a preference for female students who have an interest in technology.</p>	
<hr/>	
Award	
\$0.00	
Deadline	
06/30/2025	
<hr/>	
<p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

The Scholarships and Programs Listed Above Violate The Law

The scholarships and programs identified above violate either Title VI, by discriminating on the basis of race, color, or national origin, or Title IX, by discriminating on the basis of sex, or both.⁷

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.”

⁷ 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 Bowdoin. 42 U.S.C. § 2000(a)(a). These scholarships also violate Maine state law. Me. Rev. Stat. tit. 5, § 4602 (2023). Finally, these scholarships violate Bowdoin’s own nondiscrimination policy. See <https://www.bowdoin.edu/dean-of-students/ccs/community-standards/freedom-from-discrimination-policy.html> [<https://archive.ph/wip/WTuSs>] (accessed on May 17, 2025).

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 Bowdoin receives federal funds,⁸ it is subject to Title VI.

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 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 Letter⁹:

“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 Bowdoin’s reasons for offering, promoting, and administering such discriminatory scholarships and programs, Bowdoin 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

⁸ See https://www.usaspending.gov/award/ASST_NON_P047A180377_9100 [<https://archive.ph/tPwT9>] (accessed on May 19, 2025).

⁹ 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/iNNIM>] (“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.”)

whole or otherwise promote equality at the group level.” *Students for Fair Admissions*, 600 U.S. at 289 (Gorsuch, J., concurring).

Because Bowdoin’s racial and/or ethnicity-based requirements for these scholarships and programs are presumptively invalid, the use of such criteria violates federal civil rights statutes.

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 or programs 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 v. Bollinger*, 539 U.S. 306, 334 (2003).

Bowdoin’s explicit race, color, national origin, and/or sex-based scholarships and programs are presumptively invalid; Bowdoin’s offering, promotion, and administration of these programs violates federal civil rights statutes.

OCR Has Jurisdiction

OCR enforces Title VI of the Civil Rights Act of 1964¹⁰ and its implementing regulation,¹¹ which prohibit discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, including from the Department of Education,¹² Bowdoin is subject to Title VI and OCR has jurisdiction over this case.

¹⁰ 42 U.S.C. §§ 2000d-2000d-7.

¹¹ 34 C.F.R. Part 100.

¹² https://www.usaspending.gov/award/ASST_NON_P063P241533_9100
[<https://archive.ph/wip/DITgx>] (accessed May 18, 2025).

The Complaint Is Timely

This complaint is timely brought because it includes allegations of discrimination based on race, color, and national origin, or sex, that occurred within 180 days and that appear to be ongoing. These scholarships have an application deadline of June 30, 2025.¹³

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) (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, the fact that it conditions eligibility for multiple programs on race, color, and/or national origin, and/or sex, violates Title VI and/or Title IX, or both.

The Office for Civil Rights has the power and obligation to investigate Bowdoin’s role in creating, funding, promoting and administering these scholarships – and, given how many there are, to discern whether Bowdoin is engaging in such discrimination in its other activities – as well as the duty to impose whatever remedial relief is necessary to hold it accountable for this 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. 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 promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from Bowdoin’s various scholarships and programs based on discriminatory criteria, and ensure that all ongoing and future scholarships and programming at Bowdoin comports with the federal civil rights laws.

¹³ <https://bowdoin.academicworks.com/opportunities/39709> [<https://archive.ph/wip/HKjwe>] (accessed May 19, 2025).

U.S. Dept. of Education, Office for Civil Rights
Civil Rights Complaint – Bowdoin College
May 21, 2025
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Respectfully submitted,

/William A. Jacobson/

William A. Jacobson, Esq.
President
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Contact@legalinsurrection.com

/Robert J. Fox/

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