



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

July 18, 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.Atlanta@ed.gov)

U.S. Department of Education
Office for Civil Rights – Atlanta Office
U.S. Department of Education
61 Forsyth St. S.W., Suite 19T10
Atlanta, GA 30303-8927

**Re: Civil Rights Complaint Against Florida State University Regarding
Discriminatory Scholarship Programs**

To Whom It May Concern:

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

We bring this civil rights complaint against Florida State University ("FSU"), a public university, for discrimination in thirty-two (32) scholarships based on race, color, national origin, and/or sex, 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.

FSU offers a range of scholarships based on merit, extracurricular involvement, or personal background, but recipients must meet specific eligibility and renewal requirements.² In most cases, students are considered based on the information provided in their general scholarship application.

Scholarships

Scholarships are a type of aid that does not need to be paid back and can be based on merit, extracurricular activities, or demographics. Some scholarships require that you complete the **Free Application for Federal Student Aid (FAFSA)**. Filling out the FAFSA should always be your first step in applying for financial aid of any type. The key to earning a scholarship is to make the effort to identify scholarships that you may qualify for, respond fully and accurately to any application requirements, and don't give up! Scholarship renewal is based upon the requirements and funding of each donor. Bright Futures renewal criteria can be found **here**.

Scholarship Scams!

Beware of any scholarship search service that charges a fee. The information that you are paying for could be obtained through another source at no cost. Visit the Federal Student Aid site on **How to Avoid Student Aid Scams** for guidance on how to identify and avoid scholarship scams.

FS4U

FSU offers an online scholarship platform to help you in your scholarship search: **FS4U - Finding Scholarships For You**. FS4U identifies any FSU Foundation scholarships that you may apply for. Please review it carefully, and check back frequently as new opportunities may be added at any time.

The Finding Scholarships For You (“FS4U”) platform—FSU’s online scholarship system—is frequently updated with new opportunities and includes many scholarships that are awarded primarily based on the general scholarship application.³

² <https://financialaid.fsu.edu/types-aid/scholarships> [<https://archive.is/wip/NjYOH>] (accessed on July 16, 2025).

³ <https://fsu.academicworks.com/opportunities> [<https://archive.ph/wip/Mvyv4>] (accessed on July 16, 2025).

The screenshot shows the 'All Opportunities' page of the Florida State University Scholarship Opportunities homepage. The page has a dark red header with 'Opportunities' and 'Donors' tabs. Below the header, the title 'All Opportunities' is displayed on the left, and a 'Show Filters' button is on the right. The main content area contains a welcome message, a paragraph about scholarship awards, a paragraph about the sign-in process, a list of scholarship opportunities, and definitions for 'Award', 'Name', 'Deadline', and 'Actions'.

▼ Opportunities Donors

All Opportunities Show Filters

Welcome to FS4U – Finding Scholarships for You, Florida State University's Scholarship Opportunities homepage!

Florida State University awards numerous scholarships each academic year through the fundraising efforts of the Florida State University Foundation and the generosity of private donors. Scholarship award amounts vary and are often awarded based on several factors including, but not limited to, demonstrated academic success, donor-stipulated criteria and financial need.

To be considered for any of these scholarships, students must click **Sign In** at the top right corner of this page. This will direct them to the login screen of the campus scholarship portal where they can log in using their FSUID and password to access and complete the general application as well as any supplemental applications for scholarships that they may be recommended for. After completing each of these steps, students can follow their application status on their dashboard.

Below is a list of the scholarship opportunities offered through the Florida State University Foundation at this time. It is a student's responsibility to check back frequently for additional scholarship opportunities that may become available. If students have questions concerning these opportunities, they should contact the academic college or unit who administers the opportunity. A complete list of contacts can be found [here](#).

Award: The amount stated is for general information purposes and not a guarantee of what a student may receive if awarded. Actual award amounts can vary based on recipient eligibility, available funds, and other factors.

Name: This is the name of the scholarship opportunity being offered as well as any details concerning the application process (criteria which must be met for students to qualify and additional supplemental information that will be required to be provided in order for them to be considered).

Deadline: The date by which students should complete the General Application, any Supplemental Applications, or any individual scholarship applications to receive consideration. This is not the deadline to accept the award.

Actions: Upon completion of the General Application and any Supplemental Applications, students will automatically be matched to scholarship opportunities for which they qualify based on information they provided on the applications as well as other data being imported from Student Central. These scholarships indicate "None" under "Action" and require no additional information from the student for consideration. Other scholarships for which students may qualify indicate "Apply" under "Action" and require additional information be provided for consideration. A list of these scholarships can be found once students log in to the portal by viewing Recommended Opportunities from the Opportunities tab. Students should read each description thoroughly and only apply to those scholarships they qualify for.

The scholarships listed below are currently offered to FSU students and applicants for admission, according to the FSU website, and violate Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations⁴ by discriminating against students based on their race, color or national origin, or Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations⁵ by discriminating against students based on their sex. Because FSU is a public university, these discriminatory scholarships also violate the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution.⁶

Each of the scholarships listed below are currently available to students, according to the FSU website⁷ (discriminatory requirement in bold):

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.

⁶ FSU frequently references the “preference of the donor” for discrimination. That is not a defense for FSU since it is promoting the scholarships in a manner that would dissuade non-favored groups from applying. There would be no reason for FSU to include such preferences in the scholarship description unless it intended to honor donor intent.

⁷ <https://fsu.academicworks.com/> [<https://archive.is/wip/d8r2n>] (accessed July 16, 2025).

I. **SCHOLARSHIPS THAT VIOLATE TITLE VI (14)**

1. **Crockett Family Fund for Excellence**

Link: <https://fsu.academicworks.com/opportunities/35068>

Archived Link: <https://archive.ph/wip/iVg3o>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an **African American/Black student**.”

▼ Opportunities	Donors
Crockett Family Fund for Excellence Recipient must be a deserving undergraduate student in the College of Criminology and Criminal Justice. First preference will be given to those who are enrolled in the Center for Academic Retention and Enhancement (CARE), are graduates of Blanche Ely High School in Pompano Beach, Florida, and are residents of Broward County, Florida. If not a graduate of Blanche Ely High School, residents of Palm Beach County or Miami-Dade County may also be considered. Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an African American/Black student.	
Donor Crockett Foundation Inc.	
Award Varies	
Academic College/Unit College of Criminology & Criminal Justice	
Deadline 09/05/2025	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

2. **Dr. Hulon and Dinah Crayton Endowed Scholarship**

Link: <https://fsu.academicworks.com/opportunities/33229>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **minority student**.”⁸

⁸ FSU defines “minorities” as “Asian, American Native or Alaskan Native, Black or African American, Hispanic/Latino, Native Hawaiian or Other Pacific Islander.” [https://hr.fsu.edu/sections/equal-opportunity-compliance-engagement/compliance-glossary#:~:text=Marital%20Status%20\(Protected%20Group\),\(Federal%20Race/Ethnicity%20Code\)](https://hr.fsu.edu/sections/equal-opportunity-compliance-engagement/compliance-glossary#:~:text=Marital%20Status%20(Protected%20Group),(Federal%20Race/Ethnicity%20Code)) [<https://archive.ph/wip/3XuyK>] (accessed July 17, 2025). 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.*

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

Dr. Hulon and Dinah Crayton Endowed Scholarship

Recipient must be a degree-seeking student attending Florida State University at the Panama City campus. Recipient must possess and maintain a minimum 2.5 FSU GPA, be enrolled in at least 6 credit hours and demonstrate financial need. First priority for awarding of the scholarship shall be to qualified students who are enrolled in the School of Nursing. If there are no such applicants, the scholarship may be awarded to qualified applicants enrolled in any undergraduate degree program offered at FSU Panama City. If at any time in the future undergraduate programs in the curriculum area of health/medical sciences are established at FSU Panama City, it is understood that the first priority of awarding of the scholarship shall be amended to a qualified student enrolled in one of the health/medical sciences programs.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a minority student.

Donor
[Ms. Dinah M. Crayton](#)

Award
Varies

Academic College/Unit
Panama City Campus

Deadline
10/01/2025

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

3. **Dr. Martin Luther King, Jr. Book Stipend**

Link: <https://fsu.academicworks.com/opportunities/31349>

Archived Link: <https://archive.ph/wip/y6LSs>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an **African American student.**”

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).

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

Dr. Martin Luther King, Jr. Book Stipend

Recipient must be either 1) an undergraduate student with a minimum 2.5 GPA who has completed 15 credit hours at FSU prior to submission of this application, be enrolled in at least 12 credit hours in the current semester, and maintain full-time enrollment at FSU for the subsequent academic year, or 2) a graduate student with a minimum 3.0 GPA, be enrolled in at least 9 credit hours in the current semester, and maintain full-time enrollment at FSU for the subsequent academic year.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an African American student.

To apply, students must provide a transcript, a letter of recommendation, and answer four (4) essay questions. Due to the volume of applicants, any student who has been awarded the book stipend in the past may not apply again.

Donor
[Scholarship Committee](#)

Award
\$350

Deadline
10/15/2025

Supplemental Questions

1. Upload a copy of your transcript.
2. Provide the name and email address of a Florida State University faculty member, staff member, or advisor who will submit a letter of recommendation on your behalf.
3. Please express your financial need and how receiving this award would alleviate that need.
4. Dr. Martin Luther King, Jr. fought for the equal treatment of all people. Considering this, what does his legacy mean to you?
5. Dr. Martin Luther King, Jr. said, "All labor that uplifts humanity has dignity and importance and should be undertaken with painstaking excellence." How have you lived a life of service and leadership up until now? What are your plans to continue a life of service and leadership in the future?
6. [Show 1 more](#)

4. **Danfoss FAMU-FSU College of Engineering Fund**

Link: <https://fsu.academicworks.com/opportunities/34267>

Archived Link: <https://archive.ph/wip/9Djr9>

Discriminatory Requirement: "Preference will be given to applicants who are first-generation college students and/or an **underrepresented minority** at FAMU-FSU College of Engineering who study in areas of mechanical engineering, materials science, environment, energy, power, advanced manufacturing, data science and related fields."

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

Danfoss FAMU-FSU College of Engineering Fund

Recipient must be a student in the FAMU-FSU College of Engineering. Preference will be given to applicants who are first-generation college students and/or an underrepresented minority at FAMU-FSU College of Engineering who study in areas of mechanical engineering, materials science, environment, energy, power, advanced manufacturing, data science and related fields.

Donor
[Danfoss](#)

Award
Varies

Academic College/Unit
College of Engineering

Deadline
10/15/2025

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

5. **FSU Black Alumni - Byrnes Guillaume, Esq Scholarship for a Black Student of Caribbean Descent**

Link: <https://fsu.academicworks.com/opportunities/33342>

Archived Link: <https://archive.ph/wip/Bhoi8>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **Black or African American and of Caribbean descent** (born in a Caribbean island or country or first generation American with parent(s) born in a Caribbean island or country).”

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

FSU Black Alumni - Byrnes Guillaume, Esq Scholarship for a Black Student of Caribbean Descent

Recipient must be enrolled as a student at FSU during the current academic school year and must have completed or updated the Free Application for Federal Student Aid (FAFSA) for the current academic school year. During the current academic school year, the FSU Black Alumni will award a \$1,000 Byrnes Guillaume, Esq. Scholarship to one (1) deserving student. This one-time scholarship award will be distributed to the selected recipient during the Fall semester, unless specified otherwise.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be Black or African American and of Caribbean descent (born in a Caribbean island or country or first generation American with parent(s) born in a Caribbean island or country).

Donor
[FSU Black Alumni Association, Inc.](#)

Award
\$2,000

Deadline
03/10/2025

Supplemental Questions

1. Are you of Caribbean Descent?
2. Were your parents born in a Caribbean Island?
3. Have you completed or updated a Free Application for Federal Student Aid (FAFSA) for the current academic school year?
4. Briefly describe your academic experiences and community involvement outside the formal classroom.
5. Provide an essay describing how you took a stand and were courageous in the face of injustice or a challenging situation, and how you used this as an opportunity to build social solidarity, encourage understanding, or broaden your academic experiences.

6. **FSU Black Alumni - In Honor of Dr. William R. Jones**

Link: <https://fsu.academicworks.com/opportunities/33048>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **Black or African American.**”

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

FSU Black Alumni - In Honor of Dr. William R. Jones

Recipient must be enrolled as a student at FSU during the current academic school year and must have completed or updated a Free Application for Federal Student Aid (FAFSA) for the current school year. During the current academic school year, the FSU Black Alumni will award a \$500.00 scholarship in honor of Dr. William R. Jones to one (1) deserving student. This one-time scholarship will be distributed to the selected recipient during Fall semester, unless otherwise specified.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be Black or African American.

Donor
[FSU Black Alumni Association, Inc.](#)

Award
\$1,000

Deadline
03/10/2025

Supplemental Questions

1. Are you of Black or African minority descent?
2. Have you completed or updated a Free Application for Federal Student Aid (FAFSA) for the current academic school year?
3. Provide an essay describing how you took a stand and were courageous in the face of injustice or a challenging situation, and how you used this as an opportunity to build social solidarity, encourage understanding, or broaden your academic experiences.
4. Briefly describe your academic experiences and international involvement outside the formal classroom and explain how you plan to implement change after graduation using your platform or within your profession on an international scale.

7. **FSU Black Alumni - In Honor of Eva Killings**

Link: <https://fsu.academicworks.com/opportunities/34275>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **Black or African American.**”

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

FSU Black Alumni - In Honor of Eva Killings

Recipient must be a student enrolled at FSU during the current academic school year and must have completed or updated a Free Application for Federal Student Aid (FAFSA) for the current school year. During the current academic school year, the FSU Black Alumni will award a \$1,000 scholarship to one (1) deserving student who works 20 or more hours per week on campus and is in good academic standing.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be Black or African American.

Donor
[FSU Black Alumni Association, Inc.](#)

Award
\$1,000

Deadline
03/10/2025

Supplemental Questions

1. Are you of Black or African minority descent?
2. Have you completed or updated a Free Application for Federal Student Aid (FAFSA) for the current academic school year?
3. Briefly describe how working on campus has extended your education and connection to FSU outside the formal classroom. Explain how you plan to help others build connections to FSU.

8. **FSU Black Alumni - Student Involved in International Programs**

Link: <https://fsu.academicworks.com/opportunities/33355>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **Black or African American.**”

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

FSU Black Alumni - Student Involved in International Programs

Recipient must be a student enrolled at FSU during the current academic school year and must have completed or updated a Free Application for Federal Student Aid (FAFSA) for the current school year. During the current academic school year, the FSU Black Alumni will award a \$500 scholarship to one (1) deserving student who is involved in the International Programs or plans to study or work abroad. This one-time scholarship will be distributed to the selected recipient during Fall semester, unless specified otherwise.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be Black or African American.

Donor
[FSU Black Alumni Association, Inc.](#)

Award
\$1,000

Deadline
03/10/2025

Supplemental Questions

1. Are you of Black or African minority descent?
2. Have you completed or updated a Free Application for Federal Student Aid (FAFSA) for the current academic school year?
3. Provide an essay describing how you took a stand and were courageous in the face of injustice or a challenging situation, and how you used this as an opportunity to build social solidarity, encourage understanding, or broaden your academic experiences.
4. Briefly describe your academic experiences and international involvement outside the formal classroom and explain how you plan to implement change after graduation using your platform or within your profession on an international scale.

9. **FSU Black Alumni - In Honor of Maxwell Courtney**

Link: <https://fsu.academicworks.com/opportunities/33529>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **Black or African American.**”

▼ Opportunities	Donors
FSU Black Alumni - In Honor of Maxwell Courtney	
<p>Recipient must be enrolled as a student at FSU during the current academic year and must have completed or updated the Free Application for Federal Student Aid (FAFSA) for the current academic school year. Recipient must also be an incoming freshmen from one of Duval, Gadsden, Leon, Miami-Dade or Orange Counties, who are graduating from High School with an International Baccalaureate (IB) Diploma or the Early College Program as eligible candidates for consideration of this award, as the Black Alumni, Inc. deem them to be first time freshmen on campus. During the current academic school year, the FSU Black Alumni will award a \$500.00 scholarship in honor of Maxwell Courtney to one (1) deserving student. This one-time scholarship award will be distributed to the selected recipient during Fall semester, unless otherwise specified.</p> <p>Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be Black or African American.</p>	
<hr/>	
Donor FSU Black Alumni Association, Inc.	
Award \$1,000	
Deadline 03/24/2025	
Supplemental Questions <ol style="list-style-type: none">1. Are you from any of the following Florida counties: Duval, Gadsden, Leon, Miami-Dade or Orange?2. Have you completed or updated a Free Application for Federal Student Aid (FAFSA) for the current academic school year?3. Are you of Black or African minority descent?4. Provide an essay describing how you took a stand and were courageous in the face of injustice or a challenging situation, and how you used this as an opportunity to build social solidarity, encourage understanding, or broaden your academic experiences.5. Briefly describe your academic experiences and international involvement outside the formal classroom and explain how you plan to implement change after graduation using your platform or within your profession on an international scale.	

10. **Mike Franck Memorial Scholarship for Engineering Students**

Link: <https://fsu.academicworks.com/opportunities/32190>

Archived Link: <https://archive.ph/wip/wZ1VP>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an **African American or immigrant student.**”

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

Mike Franck Memorial Scholarship for Engineering Students

Recipient must be a student in the College of Engineering in their junior or senior year in good academic standing. Preference will be given to a student with the greatest financial need, who is the first generation within their family to attend college, and is from Palm Beach County or Leon County, FL.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an African American or immigrant student.

Donors
[Ms. Josette Naude](#)
[Ms. Sybille Naude](#)
[Mr. Richard Saks](#)
[Ms. Carrie R. Tillett-Saks](#)

Award
Varies

Academic College/Unit
College of Engineering

Deadline
10/15/2025

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

11. **Peter Boulware Toyota Scholarship**

Link: <https://fsu.academicworks.com/opportunities/30856>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **Black or African American.**”

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

Peter Boulware Toyota Scholarship

Recipient must be an undergraduate student minoring in Automotive Franchising.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be Black or African American.

Donor
[Peter Boulware Toyota](#)

Award
Varies

Academic College/Unit
Jim Moran College of Entrepreneurship

Deadline
10/01/2025

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

12. **Southern Bell Presidential Scholarship Fund for Minority Engineering Students**

Link: <https://fsu.academicworks.com/opportunities/30960>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **minority student.**”

▼ Opportunities	Donors
Southern Bell Presidential Scholarship Fund for Minority Engineering Students	
Recipient must be a student in the College of Engineering.	
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a minority student.	
<hr/>	
Donor Scholarship Committee	
Award Varies	
Academic College/Unit College of Engineering	
Deadline 10/15/2025	
<hr/>	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

13. **W. David Ellrich, Jr. CPA Scholarship Fund**

Link: <https://fsu.academicworks.com/opportunities/32682>

Archived Link: <https://archive.ph/wip/eXkP9>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an **educationally disadvantaged student, including African American, Hispanic or other ethnic minority descent.**”

▼ Opportunities	Donors
W. David Ellrich, Jr. CPA Scholarship Fund <p>Recipient must be an undergraduate student in the College of Business. A student will be selected based upon a review of their personal profiles, including such characteristics as family income and economic hardship, single-parent family, first generation in college, challenges of the applicant's high school, geographic challenges, relative personal challenges and achievements, civic and intercultural awareness, leadership, initiative, honors and awards, specialized knowledge, and unusual characteristics.</p> <p>Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an educationally disadvantaged student, including African American, Hispanic or other ethnic minority descent.</p>	
Donor Mr. W. David Ellrich, Jr. and Ms. Becky B. Moore	
Award Varies	
Academic College/Unit College of Business	
Deadline 03/05/2025	

14. **Fannie Lou Hamer Scholarship**

Link: <https://fsu.academicworks.com/opportunities/31523>

Archived Link: <https://archive.ph/wip/OIyh5>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **minority student.**”

▼ Opportunities	Donors
Fannie Lou Hamer Scholarship <p>Recipient must be a student in the School of Communication. Preference will be given to a first generation student who demonstrates financial need.</p> <p>Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a minority student.</p>	
Donor Mr. William L. Houck, Jr.	
Award Varies	
Academic College/Unit School of Communication, College of Communication and Information	
Deadline 09/01/2025	

II. SCHOLARSHIPS THAT VIOLATE BOTH TITLE VI AND IX (5)

1. Crossman Career Builders Scholarship

Link: <https://fsu.academicworks.com/opportunities/33211>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female who is Black/African American, Hispanic, or a member of the Seminole Tribe.**”

▼ Opportunities	Donors
<h3>Crossman Career Builders Scholarship</h3> <p>Recipient must be a student in the College of Business.</p> <p>Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female who is Black/African American, Hispanic, or a member of the Seminole Tribe.</p> <hr/> <p>Donor Mr. John M. Crossman and Ms. Angela B. Crossman</p> <p>Award Varies</p> <p>Academic College/Unit College of Business</p> <p>Deadline 03/05/2025</p>	

2. Disciples of the Diamond Spring 81 Scholarship

Link: <https://fsu.academicworks.com/opportunities/34743>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is an additional preference of the donor that the recipient be an **African American male.**”

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

Disciples of the Diamond Spring 81 Scholarship

Recipient must be a first-generation, economically disadvantaged undergraduate student engaged in the Center for Academic Retention and Enhancement (CARE). Preference will be given to incoming freshmen who are interested in becoming members of the Theta Eta Chapter of the Kappa Alpha Psi Fraternity.

Any student may apply to be considered for the award; however, it is an additional preference of the donor that the recipient be an African American male.

Donors

[Mr. Charles D. Johnson](#)
[Mr. James R. Brooks, Jr.](#)
[Mr. Leonardo D. Starke](#)
[Mr. Donald Harvey](#)
[Mr. Zack Stewart, Jr.](#)
[Mr. Andre R. Jackson](#)

Award

Varies

Academic College/Unit

Undergraduate Studies

Deadline

10/15/2025

Supplemental Questions

1. Are you a member of the Theta Eta Chapter of Kappa Alpha Psi Fraternity, or are you interested in becoming a member of the Theta Eta Chapter of the Kappa Alpha Psi Fraternity Incorporated?

3. **Dynamic African American Women in Engineering Powerhouse Scholarship**

Link: <https://fsu.academicworks.com/opportunities/32051>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an **African American female student.**”

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

Dynamic African American Women in Engineering Powerhouse Scholarship

Recipient must be an undergraduate student in the College of Engineering with a minimum 2.5 GPA who has earned at least 60 credit hours from an accredited higher education institution.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be an African American female student.

Donors
[Ms. Shrelle D. Henry](#)
[Ms. Brittney E. McCambry](#)
[Ms. Shellina C. Reeves](#)

Award
\$500

Academic College/Unit
College of Engineering

Deadline
10/15/2025

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

4. **Grant and Camille Farr Scholarship**

Link: <https://fsu.academicworks.com/opportunities/33535>

Archived Link: <https://archive.ph/wip/A1tlr>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female minority student**.”

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

Grant and Camille Farr Scholarship

Recipient must be a student in the Dedman College of Hospitality within the Global Club Management and Leadership program. Preference will be given to a first generation student serving as a summer intern at a country club.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female minority student.

Donor
[Donald G. Farr, Ph.D.](#)

Award
Varies

Deadline
03/01/2025

Supplemental Questions
1. Are you doing a summer internship at a country club?

5. **Walter T. King Scholarship**

Link: <https://fsu.academicworks.com/opportunities/34664>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student of Black or African descent** and a first generation college student.”

▼ Opportunities	Donors
Walter T. King Scholarship Recipient must be a student in the College of Medicine with a minimum 3.0 GPA and involvement in community service and extracurricular activities. Preference will be given to a first generation, female Medical Student. Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student of Black or African descent and a first generation college student.	
Donor Mr. Eric Friall and Andrea D. Friall, M.D.	
Award Varies	
Deadline 05/02/2025	
Supplemental Questions 1. Submit a written essay demonstrating financial need. 2. Briefly describe your involvement in community service and extracurricular student activities. You may include any medial related affiliations. 3. Briefly explain your medical pathway, which should include the type of residency program, you intend to pursue.	

III. **SCHOLARSHIPS THAT VIOLATE TITLE IX (13)**

1. **College of Arts and Sciences Student Travel Awards**

Link: <https://fsu.academicworks.com/opportunities/35507>

Archived Link: <https://archive.ph/wip/COrz9>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female.**”

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

College of Arts and Sciences Student Travel Awards

Recipient must be a graduate student enrolled in the College of Arts & Sciences. This scholarship is exclusively for travel to conferences and to present papers.
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female.

Donor
[Ms. Ermine M. Owenby, Jr.](#)

Award
\$500.00

Academic College/Unit
College of Arts & Sciences

Deadline
08/15/2025

Supplemental Questions

1. Provide the name of the conference you are seeking funding for.
2. Provide the location of the conference (City, State, Country).
3. Provide the dates of the conference travel.
4. Select the type of conference.
5. Select your level of participation in the conference/meeting.
6. [Show 2 more](#)

2. **Dezso and Fanny Julius Scholars Fund**

Link: <https://fsu.academicworks.com/opportunities/33724>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student**.”

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

Dezso and Fanny Julius Scholars Fund

Recipient must be an Undergraduate student seeking a degree in a STEM field who has unmet financial need and maintains a 3.0 GPA or higher.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student.

The full list of STEM-eligible majors is available [here](#).

Donor
[Scholarship Committee](#)

Award
Varies

Academic College/Unit
Undergraduate Studies

Deadline
10/15/2025

Supplemental Questions
1. Are you seeking a degree in a STEM field?

Please review the list of STEM-eligible majors at FSU [here](#).

3. **Eileen Marie Mahan Endowed Scholarship - Fall Application**

Link: <https://fsu.academicworks.com/opportunities/35150>

Archived Link: <https://archive.ph/wip/QLM2l>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student.**”

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

Eileen Marie Mahan Endowed Scholarship - Fall Application

Recipient must be a student in the College of Nursing.
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student.

Donor
[Bank of America](#)

Award
Varies

Academic College/Unit
College of Nursing

Deadline
09/25/2025

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

4. **Lettie Pate Whitehead Foundation Nursing Scholarship - Fall Application**

Link: <https://fsu.academicworks.com/opportunities/35143>

Archived Link: <https://archive.ph/wip/c94xe>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student** of Christian faith.”

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

Lettie Pate Whitehead Foundation Nursing Scholarship - Fall Application

Recipient must be an undergraduate student in the College of Nursing from the Southeast United States.
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student of Christian faith.

Donor
[Lettie Pate Whitehead Foundation, Inc.](#)

Award
Varies

Academic College/Unit
College of Nursing

Deadline
09/25/2025

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

5. **Joan G. Haworth Graduate Scholarship in Economics Endowment Fund**

Link: <https://fsu.academicworks.com/opportunities/25494>

Archived Link: <https://archive.ph/wip/wM115>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student.**”

▼ Opportunities	Donors
Joan G. Haworth Graduate Scholarship in Economics Endowment Fund	
Recipient must be a full-time doctoral student in the College of Social Sciences and Public Policy within the Department of Economics with a minimum 3.5 GPA.	
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student.	
<hr/>	
Donor	
ERS Group	
Award	
Varies	
Academic College/Unit	
College of Social Sciences and Public Policy	
Deadline	
08/13/2024	

6. **Junior Service League Endowed Scholarship Fund**

Link: <https://fsu.academicworks.com/opportunities/32470>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female.**”

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

Junior Service League Endowed Scholarship Fund

Recipient must be a student at Florida State University Panama City who is enrolled for a minimum of 6 credit hours. Recipient must possess and maintain a 3.0 GPA and exhibit financial need, high academic achievement, and civic involvement through participation in community or student organizations.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female.

Donor
[Junior League Of Panama City, Inc.](#)

Award
Varies

Academic College/Unit
Panama City Campus

Deadline
10/01/2025

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

7. **Linda Arnold Christoff Memorial Scholarship Fund**

Link: <https://fsu.academicworks.com/opportunities/31361>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **female**.”

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

Linda Arnold Christoff Memorial Scholarship Fund

Recipient must be a student at Florida State University Panama City who is enrolled for a minimum of 6 credit hours. Recipient must possess and maintain a 2.5 GPA and demonstrate academic ability and a need of financial assistance to complete their degree.

Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be female.

Donor
[Ms. Frances J. Arnold](#)

Award
Varies

Academic College/Unit
Panama City Campus

Deadline
10/01/2025

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

8. **Mary Dunn Baker Scholarship Fund for Economics**

Link: <https://fsu.academicworks.com/opportunities/32633>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **female.**”

▼ Opportunities	Donors
<p>Mary Dunn Baker Scholarship Fund for Economics</p> <p>Recipient must be a student in the College of Social Sciences and Public Policy within the Department of Economics.</p> <p>Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student.</p> <hr/> <p>Donor Jay Baker, Ph.D. and Dr. Mary D. Baker</p> <p>Award Varies</p> <p>Academic College/Unit College of Social Sciences and Public Policy</p> <p>Deadline 10/15/2025</p> <p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

9. **Mollie Walker Prescott Endowment**

Link: <https://fsu.academicworks.com/opportunities/33065>

Archived Link: archive.is/wip/QHgWe

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student.**”

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

Mollie Walker Prescott Endowment

Recipient must be a student in the College of Business who has financial need.
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student.

Donor
Ms. Emory Prescott

Award
Varies

Academic College/Unit
College of Business

Deadline
03/05/2025

10. **Marylou Kuhn and Ernestine Kuhn Endowed Scholarship Fund**

Link: <https://fsu.academicworks.com/opportunities/32589>

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

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student.**”

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

Marylou Kuhn and Ernestine Kuhn Endowed Scholarship Fund

Recipient must be a graduate student in the College of Fine Arts within the Department of Art Education.
Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student.

Donor
[Scholarship Committee](#)

Award
Varies

Academic College/Unit
College of Fine Arts

Deadline
03/17/2025

Supplemental Questions

1. Please briefly describe how you meet the award qualifications. This description should connect your qualifications to specific criteria provided in the award information.
2. If awarded, how do you plan to use the scholarship funds?
3. Are you currently receiving funding, scholarships, or grants from any other sources?
4. If you answered **Yes** to the previous question, please disclose any funding, scholarships, or grants from other sources here. This does not impact your eligibility to apply for funding.

11. **O'Brien-Seidman Scholarship in Psychology**

Link: <https://fsu.academicworks.com/opportunities/34623>

Archived Link: <https://archive.ph/wip/LS1ZY>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient **be female** and a single mother.”

▼ Opportunities	Donors
O'Brien-Seidman Scholarship in Psychology Recipient must be enrolled in the Department of Psychology within the College of Arts and Sciences. Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be female and a single mother.	
Donor Mrs. Mary Denise O'Brien and Mr. Francis Seidman	
Award Varies	
Academic College/Unit College of Arts & Sciences	
Deadline 10/15/2025	
Supplemental Questions 1. Are you a single mother? 2. Please write a short essay about your path to the Psychology major, and your goals or plans for after graduation (if you know yet).	

12. **Panama City Junior Womens Club Endowed Scholarship Fund**

Link: <https://fsu.academicworks.com/opportunities/33334>

Archived Link: <https://archive.ph/wip/0r7E5>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be **female**.”

▼ Opportunities	Donors
Panama City Junior Womens Club Endowed Scholarship Fund Recipient must be enrolled at Panama City Campus in a minimum of 6 credit hours with at least a 2.5 GPA. Recipient must be a present or past member of the Panama City Junior Women's Club. Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be female.	
Donor Scholarship Committee	
Award Varies	
Academic College/Unit Panama City Campus	
Deadline 10/01/2025	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

13. **Allison Elizabeth Overholt Memorial Scholarship**

Link: <https://fsu.academicworks.com/opportunities/31565>

Archived Link: <https://archive.ph/01OkH>

Discriminatory Requirement: “Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a **female student.**”

▼ Opportunities	Donors
Allison Elizabeth Overholt Memorial Scholarship Recipient must be a student studying Religion in the Department of Humanities within the College of Arts and Sciences. Any student may apply to be considered for the award; however, it is the preference of the donor that the recipient be a female student student in their junior or senior year.	
Donor Mr. David S. Overholt and Mrs. Beth L. Overholt	
Award Varies	
Academic College/Unit College of Arts & Sciences	
Deadline 10/15/2025	
Supplemental Questions 1. In 500 words or less, explain how you learn best in your religion courses at FSU and what you most enjoy about taking them. 2. In 500 words or less, explain why the study of religion matters in today's world and how religious studies will contribute to your future.	

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, or both.⁹ Furthermore, because FSU 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,” and therefore applies to universities receiving federal financial assistance. Because FSU receives and administers federal funds through numerous programs, it is subject to Title VI.¹⁰

Racial criteria and preferences serve as “signals” of racial and sex-based preferences. As the Second Circuit recognized in *Ragin v. New York Times Co.*, 923 F.2d 995, 999–1000 (2d Cir. 1991), even subtle messaging can convey discriminatory preferences: “Ordinary readers may reasonably infer a racial message from advertisements that are more subtle than the hypothetical swastika or burning cross, and we read the word ‘preference’ to describe any ad that would discourage an ordinary reader of a particular race from answering it.” It is no defense, accordingly, that FSU expresses the discrimination as a “preference of the donor” in many instances. Such word games cannot evade the civil rights laws and equal protection constitutional guarantee.

Regardless of FSU’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

⁹ 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 FSU. 42 U.S.C. § 2000(a)(a). These scholarships also violate Florida state law. Fla. Stat. § 1000.05 (2024). Finally, these scholarships violate FSU’s own nondiscrimination policy. *See* https://dsst.fsu.edu/sites/g/files/upcbnu1476/files/pictures/Non-Discrimination-Grievance_0910.pdf [<https://archive.is/wip/g8LjP>] (accessed July 16, 2025).

¹⁰ *See* https://www.usaspending.gov/award/ASST_NON_R305A160166_091 [<https://archive.ph/wip/k0kKo>] (accessed on July 16, 2025).

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 FSU 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.

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, FSU 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, FSU 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 FSU’s scholarships were “imprecise,” “plainly overbroad,” “arbitrary,” “undefined” and “opaque,” 600 U.S. at 216-17,¹¹ 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.

FSU’s explicit race, ethnicity, national origin, and/or sex-based scholarships are presumptively invalid, and since there is no compelling government justification for such

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

invidious discrimination, FSU's offering, promotion, and administration of these programs violates state and federal civil rights statutes and constitutional equal protection guarantees.

OCR Has Jurisdiction

FSU is a public entity and a recipient of federal funds, including from the U.S. Department of Education.¹² 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. These scholarships are currently active.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. 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 FSU 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 FSU's role in creating, funding, promoting and administering these scholarships – and, given how many there are, to discern whether FSU is engaging in such discrimination in its other activities –and to impose whatever remedial relief is necessary to hold it accountable for that unlawful conduct. This includes, if necessary, imposing fines, initiating administrative proceedings to suspend or terminate federal financial assistance and referring the case to the Department of Justice for judicial proceedings to enforce the rights of the United States under federal law. After all, “[t]he way to stop discrimination ... is to stop discriminating[.]” *Parents Involved in Cmty. Sch.*, 551 U.S. at 748.

¹² See https://www.usaspending.gov/award/ASST_NON_R305A160166_091 [<https://archive.ph/wip/k0kKo>] (accessed on July 16, 2025).

¹³ <https://fsu.academicworks.com/> [<https://archive.is/wip/d8r2n>] (accessed July 16, 2025).

Accordingly, we respectfully ask that the Department of Education's Office for Civil Rights prioritize and expedite this complaint given the sheer number of discriminatory scholarships at FSU reflecting a systematic disregard for Titles VI and IX, promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from FSU's various scholarships based on discriminatory criteria, and ensure that all ongoing and future scholarships and programming at FSU comports with the Constitution and federal civil rights laws.

Respectfully submitted,

/William A. Jacobson/

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

/Robert J. Fox/

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