



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

September 26, 2025

BY EMAIL (OCR@ed.gov)

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 Fordham University Regarding Undergraduate and Graduate “Girl Boss” Programs

Dear OCR Staff:

This is a federal civil rights complaint pursuant to the U.S. Department of Education’s Office for Civil Rights (“OCR”) discrimination complaint resolution procedures.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 opposes unlawful discrimination in any form.

We bring this civil rights complaint against Fordham University regarding two of its officially sponsored student organizations and programs — Girl Boss (Fordham Undergraduate Women in Business) (“Undergraduate Girl Boss”) and Fordham Women in Business (“Graduate

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

Girl Boss”), for sex-based discrimination in violation of Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations.²

DISCRIMINATORY UNDERGRADUATE AND GRADUATE “GIRL BOSS” PROGRAMS

As set forth below, Fordham’s Gabelli School of Business operates undergraduate and graduate programs/clubs that, by design and promotion, are intended for women and signal that men are not welcome as full and equal participants including as to leading the programs. These programs provide valuable educational and career benefits on a sex-based discriminatory basis.

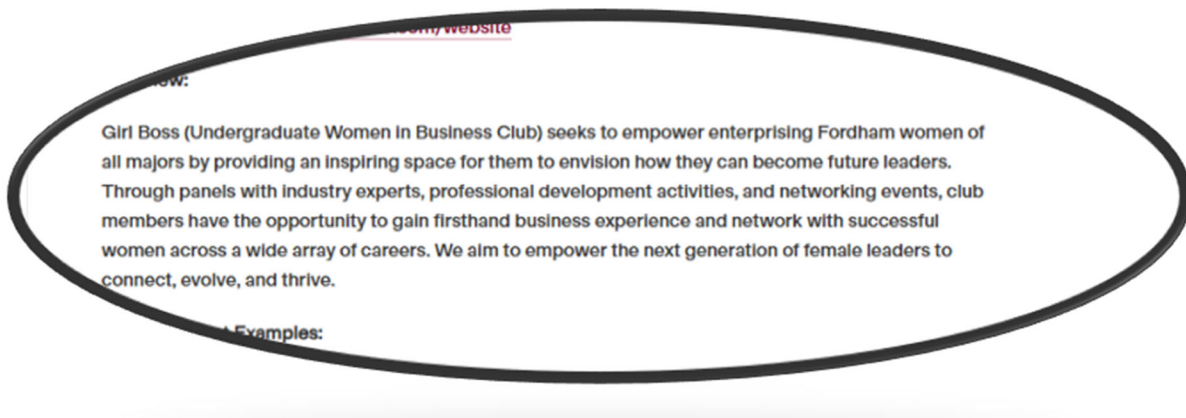
1. UNDERGRADUATE GIRL BOSS

Fordham’s Undergraduate Girl Boss seeks to “empower enterprising Fordham women of all majors by providing an inspiring space for them to envision how they can become future leaders.”³ The program provides academic and career benefits. “Through panels with industry experts, professional development activities, and networking events, club members have the opportunity to gain firsthand business experience and network with successful women across a wide array of careers.”

The screenshot shows the Fordham University website header with the Fordham logo and a "NAVIGATE FORDHAM" button. Below the header is a dark red banner for the "GABELLI SCHOOL OF BUSINESS". Underneath the banner is a navigation menu with links: About, Academic Programs and Admissions, Faculty, Alumni, Student and Career Resources, Veterans, News and Events, Industry Collaborations, and GIVE. A search icon is also present. On the left side, there is a list of links under the "Student and Career Resources" category, including: GSB Dean's Council, Blockchain at Fordham, Information Systems, Fordham Fintech Network (FIN), Investment Banking Society at Fordham, Finance Society, Fordham Marketing Association, Compass Fellowship, Membership requirements, Smart Woman Securities, Students for Fair Trade, Digital Business Society, Beta Alpha Psi, International Business Association, EDGE Program, and Ascend. The main content area features the title "GIRL BOSS (FORDHAM UNDERGRADUATE WOMEN IN BUSINESS)" in large, bold, dark red letters. Below the title, contact information is provided: Email: girlboss@fordham.edu, Instagram: https://www.instagram.com/fordhamgirlboss/, LinkedIn: https://www.linkedin.com/company/fordhamgirlboss, and Website: https://girlboss.wixsite.com/website. An "Overview:" section follows, containing a paragraph about the program's mission to empower Fordham women of all majors by providing an inspiring space for them to envision how they can become future leaders, through panels with industry experts, professional development activities, and networking events, club members have the opportunity to gain firsthand business experience and network with successful women across a wide array of careers. The text is partially cut off at the bottom.

² EPP previously filed a Title VI OCR complaint against Fordham on August 4, 2024 (Case Number 02-24-2501). See <https://equalprotect.org/case/equal-protection-project-v-fordham-university/>. The present complaint is unrelated to the programs challenged in Case No. 02-24-2501.

³ <https://www.fordham.edu/gabelli-school-of-business/student-and-career-resources/undergraduate-student-resources/student-organizations/girl-boss-fordham-undergraduate-women-in-business/> [<https://archive.ph/n5MUv>] (accessed September 25, 2025).



A. Requirements

The Undergraduate Girl Boss makes clear—both explicitly and through its signaling—that it is a program for women.

Undergraduate Girl Boss’s founding mission statement reinforces this exclusivity, stating: “Girl Boss: Fordham Undergraduate Women in Business Club seeks to empower ambitious Fordham women by providing an inspiring and supportive community.”⁴

⁴ <https://girlbosslc.wixsite.com/website/about> [<https://archive.is/wip/Rch4P>] (accessed September 25, 2025).



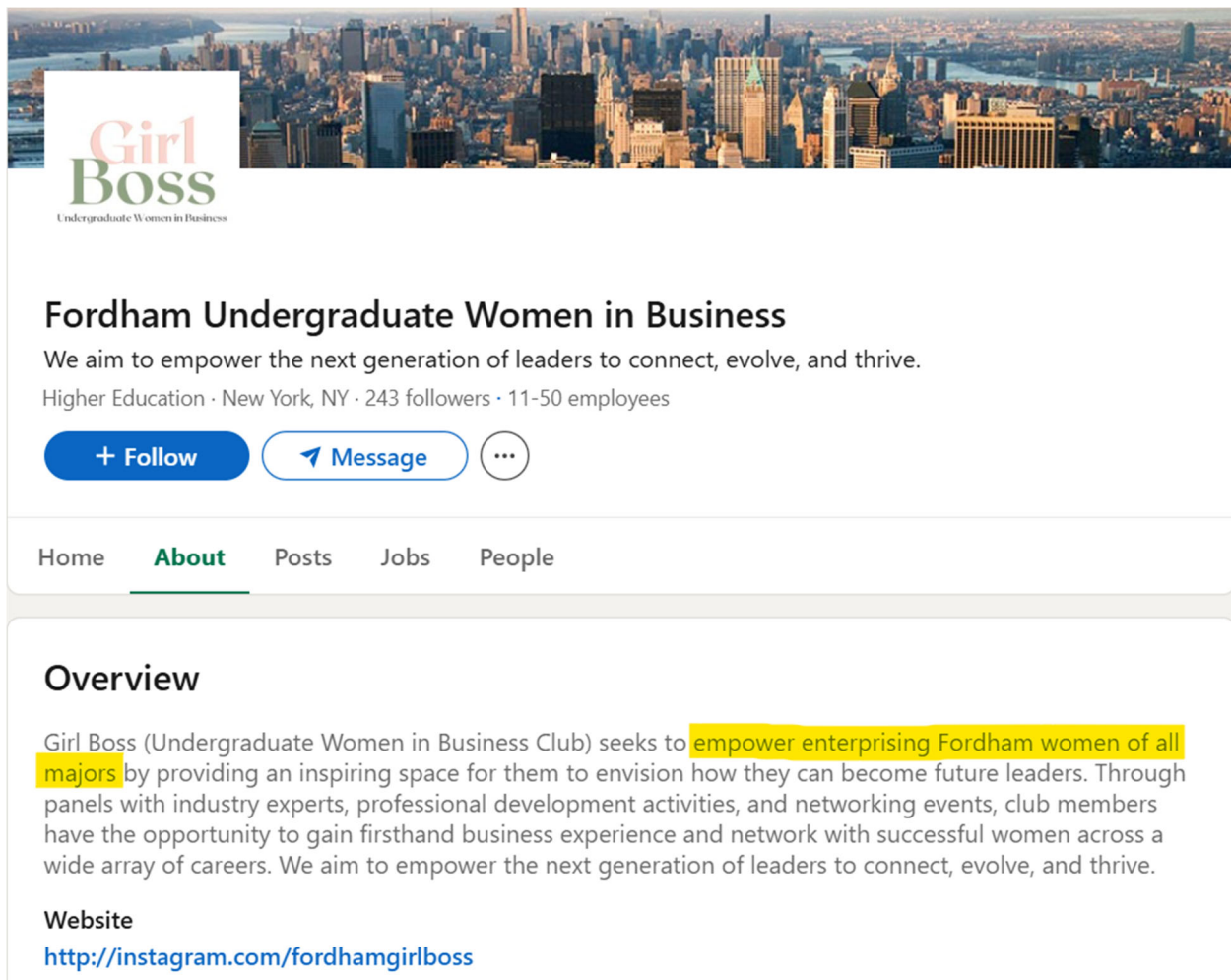
Further, the official Fordham Undergraduate Girl Boss website also demonstrates that the program is targeted at women.⁵ The Fordham website says that Undergraduate Girl Boss “... seeks to empower enterprising Fordham women of all majors...”⁶

⁵ <https://www.fordham.edu/gabelli-school-of-business/student-and-career-resources/undergraduate-student-resources/student-organizations/girl-boss-fordham-undergraduate-women-in-business/> [<https://archive.ph/n5MUv>] (accessed September 25, 2025).

⁶ Discriminatory signaling highlighted below.

Girl Boss (Undergraduate Women in Business Club) seeks to empower enterprising Fordham women of all majors by providing an inspiring space for them to envision how they can become future leaders. Through panels with industry experts, professional development activities, and networking events, club members have the opportunity to gain firsthand business experience and network with successful women across a wide array of careers. We aim to empower the next generation of female leaders to connect, evolve, and thrive.

The Undergraduate Girl Boss LinkedIn page mirrors this language.⁷



Girl Boss
Undergraduate Women in Business

Fordham Undergraduate Women in Business

We aim to empower the next generation of leaders to connect, evolve, and thrive.
Higher Education · New York, NY · 243 followers · 11-50 employees

[+ Follow](#) [Message](#) [...](#)

[Home](#) [About](#) [Posts](#) [Jobs](#) [People](#)

Overview

Girl Boss (Undergraduate Women in Business Club) seeks to empower enterprising Fordham women of all majors by providing an inspiring space for them to envision how they can become future leaders. Through panels with industry experts, professional development activities, and networking events, club members have the opportunity to gain firsthand business experience and network with successful women across a wide array of careers. We aim to empower the next generation of leaders to connect, evolve, and thrive.

Website
<http://instagram.com/fordhamgirlboss>

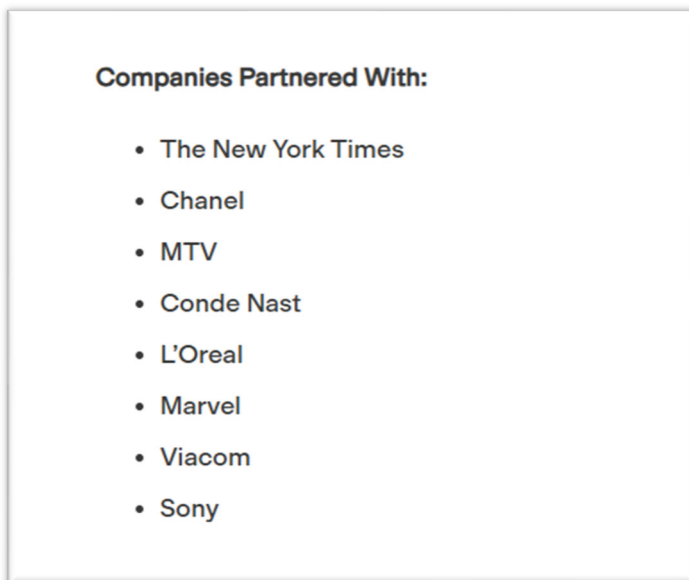
⁷ <https://www.linkedin.com/company/fordhamgirlboss/> [<https://archive.ph/wip/RvSFP>] (accessed September 25, 2025).

B. Benefits

Undergraduate Girl Boss hosts professional and educational opportunities that are targeted for female undergraduate students.⁸ Undergraduate Girl Boss hosts exclusive networking events, leadership panels, and professional-development workshops designed to help members envision and achieve future leadership roles.⁹

Moreover, Undergraduate Girl Boss advertises exclusive partnerships with major companies that provide valuable career opportunities, including:

- The New York Times
- Chanel
- MTV
- Condé Nast
- L'Oréal
- Marvel
- Viacom
- Sony



⁸ <https://girlbosslc.wixsite.com/website/about> [<https://archive.is/wip/Rch4P>] (accessed September 25, 2025).

⁹ <https://www.instagram.com/fordhamgirlboss/> [<https://archive.is/US9lF>] (accessed September 25, 2025).



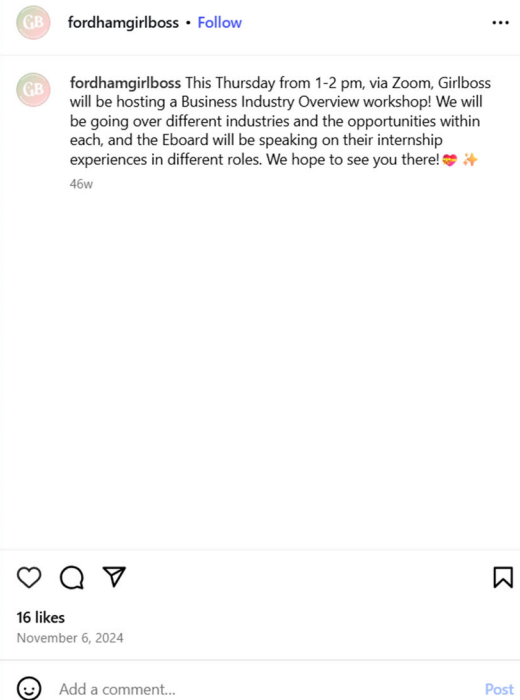
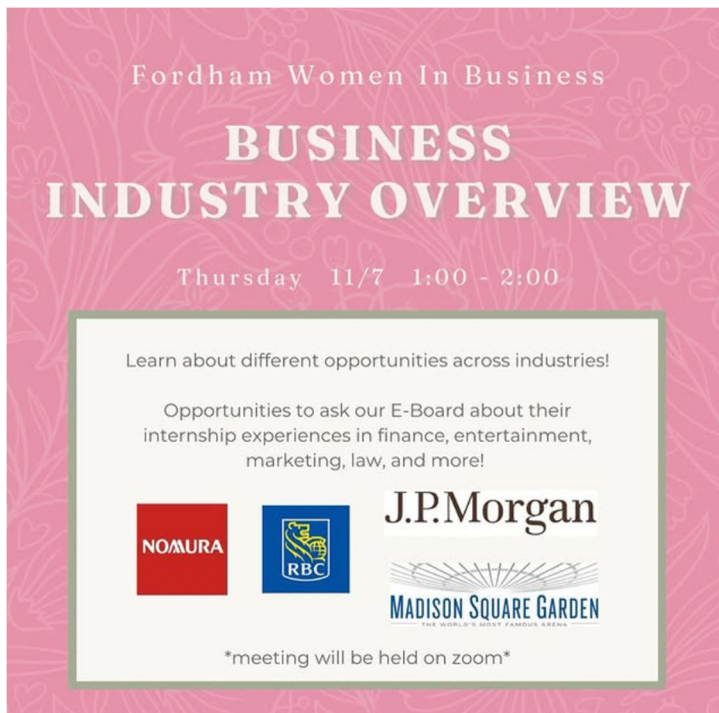
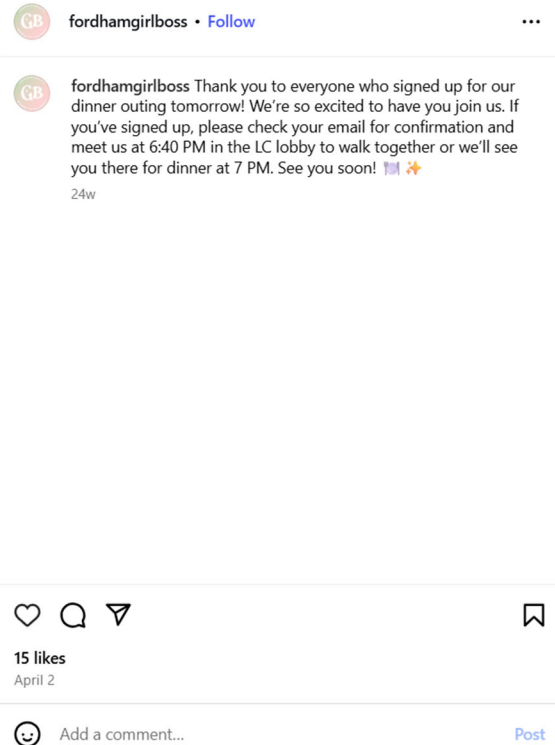
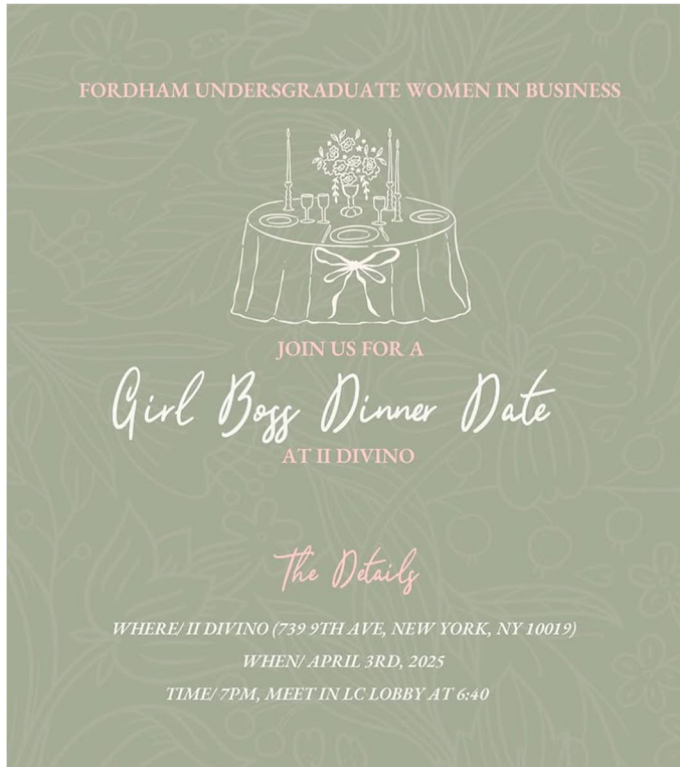
 **fordhamgirlboss** • Follow
Fordham University-Lincoln Center

 **fordhamgirlboss** The villa is officially open! 🌴💖 Kick off the semester with us at our first meeting—come meet the e-board, connect with new Girl Bosses, and hear what's planned for the semester. We can't wait to see you there!
2w

23 likes
September 3

 Add a comment... Post



C. Fordham Affiliation

Undergraduate Girl Boss is a Fordham-sponsored and officially recognized academic club at the University's Lincoln Center campus.¹⁰ Fordham clubs must be "formally approved and recognized by the University in order to become active including recruiting, organizing events, advertising activities, reserving space, and receiving funding, among other functions."¹¹

Academic Clubs

Alexander Hamilton Society

Students interested in international relations, foreign policy, economic statecraft, and national security create an environment of scholarly discussion and debate where they can exchange ideas.

Blockchain & Fintech

Participants aim to form social bonds while closing the knowledge gap between the complex fintech industry and the student body.

Consulting Club

Students learn about and prepare for a future career in the consulting field while making valuable connections.

Digital Media & Technology Club

In this club, students will gain practical knowledge and hands-on experience by learning different facets of digital media.

Economics Society

Participants will engage in conversations surrounding the economy, current events, and related topics in a social environment.

Forensic Psychology Society

Students receive exposure to the processes and functions of forensic psychology.

Girl Boss: Undergraduate Women in Business

Women interested in the various facets of business and entrepreneurship are empowered to exchange ideas, build mentorship, and create community.

¹⁰ <https://www.fordham.edu/student-life/student-organizations/lincoln-center-student-organizations/> [<https://web.archive.org/web/20250924110749/https://www.fordham.edu/student-life/student-organizations/lincoln-center-student-organizations/>] (accessed September 25, 2025).

¹¹ <https://www.fordham.edu/student-life/deans-of-students-and-student-life/student-handbook/university-regulations/a---z-listing/clubs-and-student-organizations/> [<https://archive.is/wip/USGyo>] (accessed September 25, 2025).

Girl Boss: Undergraduate Women in Business

Women interested in the various facets of business and entrepreneurship are empowered to exchange ideas, build mentorship, and create community.

ing Club

STUDENT HANDBOOK: CLUBS AND STUDENT ORGANIZATIONS

Students are encouraged to form student clubs and organizations, an important part of the educational experience of co- and extracurricular participation, service, and activity related to various interests, cultures, and causes. All student organizations must be formally approved and recognized by the University in order to become active including recruiting, organizing events, advertising activities, reserving space, and receiving funding, among other functions. Undergraduate student clubs and organizations must follow the process for club approval published and managed by the Offices for Student Involvement, United Student Government, and the Dean of Students. Graduate and professional school student organizations must follow the process for club approval published and managed by the appropriate student government (if applicable) with the additional approval of the graduate or professional school dean's office.

Students at Fordham's Lincoln Center campus, where Undergraduate Girl Boss is officially recognized, pay a \$105 fee as part of their tuition.¹² These fees are "appropriated by the Student Activities Budget Committee (SABC) to student-run organizations throughout the year...."

¹² <https://fordhamobserver.com/7621/recent/news/student-activities-fee-increase-passes-student-referendum/> [<https://archive.ph/wip/y1YIa>] (accessed September 25, 2025).

Student Activities Fee Increase Passes Student Referendum

The \$105,000 in additional funds will be used to increase club budgets for events, according to USGLC

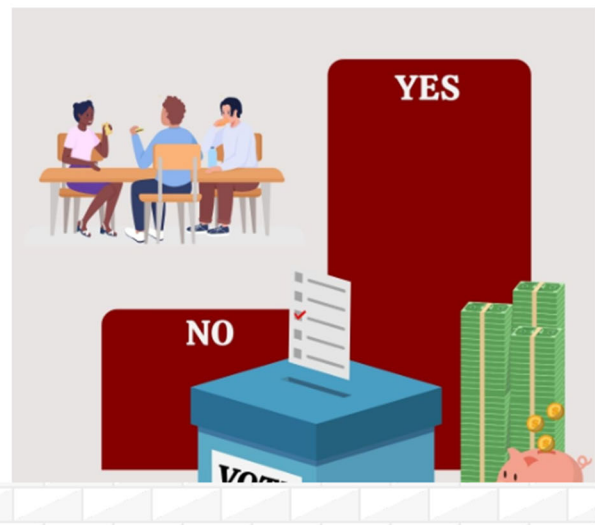
By **ANA KEVORKIAN**

April 19, 2024

The student activities fee, which funds the activities of clubs at Fordham's Lincoln Center campus, will increase by \$35 for the first time in 20 years following a referendum held by the United Student Government at Lincoln Center (USGLC). The voting process took place over email and the measure passed 383-150, according to USGLC.

All undergraduate students at Fordham's Lincoln Center campus pay the student activities fee, which is currently \$105 each year, as a part of their tuition bill. The funds raised from the fee are appropriated by the Student Activities Budget Committee (SABC) to student-run organizations throughout the year, which now total \$105,000 allocated specifically to student clubs and their activities.

Bianca Ortega, Gabelli School of Business at Lincoln Center (GSBLC) '25 and former chair of SABC, said that the committee has struggled to allocate funding to the ever-growing number of student organizations on campus in recent years due to budget cuts and inflation.



2. GRADUATE GIRL BOSS

Graduate Girl Boss is a graduate-level student organization operating primarily within Fordham's graduate business programs and largely mirrors Undergraduate Girl Boss.¹³ According to Fordham's GradLink directory and GabelliConnect materials, Graduate Girl Boss's mission is to “nurture and empower female-identifying students to become successful leaders by cultivating a positive, supportive, and well-informed community.”

¹³ <https://fordhamgsb.campuslabs.com/engage/organization/fordham-women-in-business>
[<https://archive.is/tsoes>] (accessed September 25, 2025).

GSB GradLink

Search...



Fordham Women in Business

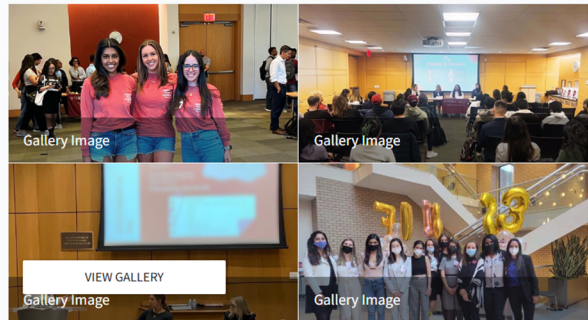
Contact

Fordham Women In Business (FWIB) was founded in 1998 at the Lincoln Center campus of Fordham University's Graduate School of Business. The organization has grown into one of the strongest and most influential communities of student leadership in New York City. We embody Fordham's spirit of community, opportunity, and development. We passionately support the confluence of students, alumni, and area professionals in an open forum of mentoring and teamwork.

FWIB's mission is to nurture and empower female-identifying students to become successful leaders by cultivating a positive, supportive, and well-informed community. We believe that our responsibilities extend beyond business school and that our role is to foster a strong community of humans who believe in achieving true gender equality. Through collaborations, panel discussions, workshops, and networking events, FWIB provides students with the tools and resources to create a more equitable world.

Contact Information

E: gsbfwb@fordham.edu



A. Requirements

Based on information we have obtained, it appears that male students are excluded from certain aspects of Graduate Girl Boss membership, including membership on the Junior Board.¹⁴ This is confirmed by the club's publicly available information, which states on Fordham's official website that its mission is "to nurture and empower female-identifying students..."¹⁵

mentoring and teamwork.

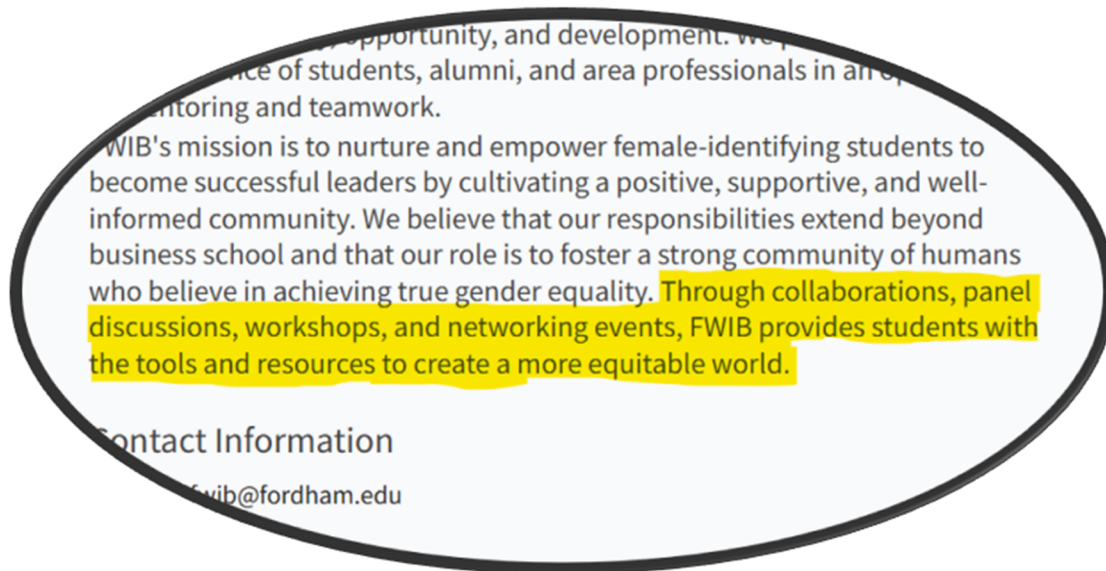
FWIB's mission is to nurture and empower female-identifying students to become successful leaders by cultivating a positive, supportive, and well-informed community. We believe that our responsibilities extend beyond business school and that our role is to foster a strong community of humans who believe in achieving true gender equality. Through collaborations, panel discussions, workshops, and networking events, FWIB provides students with the tools and resources to create a more equitable world.

¹⁴ The Graduate Girl Boss "female-identifying" verbiage does not change the sex discrimination, since the title of the program and promotion focus on females signaling that males are not welcome as full and equal participants, and would preclude the vast majority of males (who identify as male) from participating.

¹⁵ <https://fordhamgsb.campuslabs.com/engage/organization/fordham-women-in-business> [<https://archive.is/tsoes>] (accessed September 25, 2025).

B. Benefits

Graduate Girl Boss offers valuable educational and career opportunities, including “...collaborations, panel discussions, workshops, and networking events...”¹⁶



¹⁶ <https://fordhamgsb.campuslabs.com/engage/organization/fordham-women-in-business>
[<https://archive.is/tsoes>] (accessed September 25, 2025).



26TH ANNUAL CONFERENCE
PIONEERING THE PATH
Join leading women in the industry for thought-provoking panel discussions, workshops, and more!

Time	Activity
9:30 - 10:00 am	Coffee & Breakfast
10:15 - 10:30 am	FWIB - 26 years Pioneering the Path
10:30 - 11:15 am	Fireside Chat with Global CEO of Ogilvy
11:30 - 12:30 pm	Panel Discussion: Women Who Paved the Path
12:30 - 1:30 pm	Networking Lunch
1:45 - 2:30 pm	Workshop: Personal Branding
2:45 - 3:30 pm	Panel: Championing equity in Buissness and Beyond
3:30 - 4:15 pm	Workshop: Hard Conversations Workshop
4:15pm-Onward	Networking Reception

McNally Amphitheater, Platt Court
Tuesday, March 11th, 2025
9:30am - 4:15pm

Scan me to RSVP!

fwib_gsb and fordham_sac

fwib_gsb Mark your calendars! 📅 ✨

A power-packed day of inspiring panels, insightful workshops, and meaningful connections awaits. 🌟

Join us at the 26th Annual FWIB Conference as we celebrate, learn, and lead together! 💡 ❤️

[#WomenInLeadership](#) [#EmpowerElevate](#) [#HardConversations](#) [#CareerGrowth](#)

28w

22 likes
March 6

Add a comment...

Post



HARD CONVERSATIONS MADE EASY
WORKSHOP
ANIBEL SAULS, VP MORGAN STANLEY

11 MARCH 2025
3:30 PM - 4:15 PM
MCNALLY AMPHITHEATER
REGISTER NOW

LINK IN BIO! LIMITED SPOTS

fwib_gsb • Follow

fwib_gsb Introducing our host for a workshop on Hard Conversations - Anibel Sauls, VP at Morgan Stanley

Join us as she gives you her tips from years of experience to help you navigate the current job market and improve your communication skills

Tuesday, March 11
3:30 pm to 4:15 pm
McNally Amphitheater
RSVP Link in bio

Limited spots! Register ASAP to experience the biggest conference on campus and win exciting prizes and more.

[#FWIBConference2025](#)

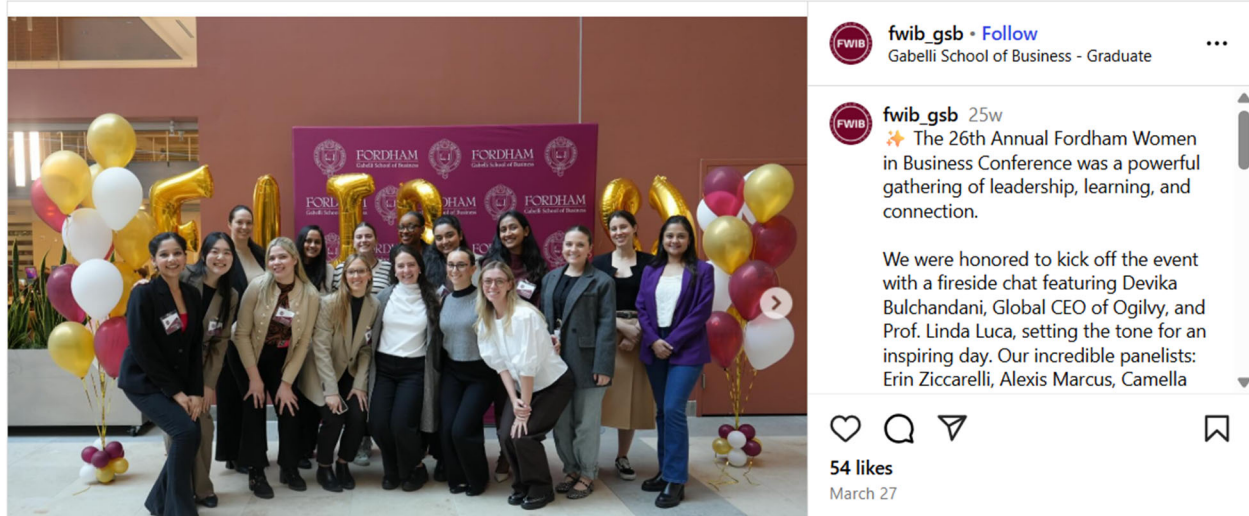
28w

8 likes
March 5

Add a comment...

Post

Graduate Girl Boss also organizes events such as the *Fordham Women in Business Conference*, designed to provide mentorship, leadership training, and networking for “female-identifying graduate students.”¹⁷



C. Fordham Affiliation

Graduate Girl Boss is a Fordham sponsored and endorsed graduate student group.¹⁸ Graduate student groups receive a \$1,000 allocation from the university, may reserve campus rooms, and enjoy other institutional benefits.¹⁹

¹⁷ <https://www.fordham.edu/gabelli-school-of-business/student-and-career-resources/graduate-student-success-center/graduate-student-engagement/graduate-student-events/> [<https://archive.ph/wip/rXADv>] (accessed September 25, 2025).

¹⁸ <https://www.fordham.edu/gabelli-school-of-business/student-and-career-resources/graduate-student-success-center/graduate-student-engagement/graduate-student-clubs/> [<https://archive.ph/wip/SI8u6>] (accessed September 25, 2025).

¹⁹ <https://www.fordham.edu/graduate-school-of-arts-and-sciences/student-resources/graduate-student-council/charter-groups/> [<https://archive.ph/wip/FGG5v>] (accessed September 25, 2025).

GRADUATE STUDENT CLUBS

Belong to Something Bigger

While you will be deeply immersed in your studies at the Gabelli School of Business, you should always make time to be with others, engage outside of the classroom, and pursue the sense of camaraderie that our student clubs provide. There are so many from which to choose and each offers the opportunity to explore shared interests while making connections that will last you a lifetime.

To join a student club, attend student hosted events, and track and show your involvement, [visit GSB GradLink](#).

2025-2026 Student Clubs

- Business in Fashion and Luxury (BIFL)
- Capital Markets Club
- Chinese Business Society
- Fordham Accounting and Tax Society (FACTS)
- Fordham Automotive Network
- Fordham Black and Latinx Graduate Club
- Fordham Blockchain Club
- Fordham Business Analytics Society (FBAS)
- Fordham Finance Society (FFS)
- Fordham International Club (FIC)
- Fordham Investments Club
- Fordham Management Consulting Association (FMCA)
- Fordham Real Estate Club
- Fordham Women in Business (FWiB)
- Gabelli Executive Leadership (GEL)



Fordham-endorsed graduate student groups are required to meet the following qualifications:²⁰

- Statement of the group's mission, purpose, and scope;
- Nomination of one or two spokespersons to coordinate the group's activities with the GSA;

²⁰ <https://www.fordham.edu/graduate-school-of-arts-and-sciences/student-resources/graduate-student-council/charter-groups/> [<https://archive.ph/wip/FGG5v>] (accessed September 25, 2025).

- Roster of members (must be primarily GSAS students);
- Presents a budget breakdown to the Council for their plans during the academic year (Note: The GSC allocates \$1000 per academic year for Charter Groups. If a Group wants more, they can present to the Council at a council meeting);
- Meets on a regular basis (at least twice a semester)

GSAS GRADUATE STUDENT COUNCIL CHARTER GROUPS

The GSC is pleased to provide funding and support to groups looking to implement programming around specific interdisciplinary interests and issues. GSC Charter Groups organize a range of social, academic, or professional events available to all GSAS students (e.g. field trips, lectures, workshops). Please see individual GSC Charter Group pages or contact us if you are interested in becoming involved with any of these groups.

The GSC is always eager to add new charter groups to our roster. Any GSAS student who is interested in creating and organizing a new charter group is welcome to submit a proposal to the GSC Representatives. Programming should include an event series that is diverse, budget-conscious, and highly inclusive.

To qualify as a GSC Charter Group, the following qualifications must be met:

- Statement of the group's mission, purpose, and scope;
- Nomination of one or two spokespersons to coordinate the group's activities with the GSA;
- Roster of members (must be primarily GSAS students);
- Presents a budget breakdown to the Council for their plans during the academic year (Note: The GSC allocates \$1000 per academic year for Charter Groups. If a Group wants more, they can present to the Council at a council meeting);
- Meets on a regular basis (at least twice a semester)

A charter group must renew its status with the GSC once a year at the first GSC representatives meeting of the academic year.

Please contact gscouncil@fordham.edu for more information.

The Girl Boss Programs Violate The Law

The Undergraduate and Graduate Girl Boss programs identified above violate Title IX, by discriminating on the basis of sex.²¹

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 programs, scholarships, fellowships, or other educational opportunities 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 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 school 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).

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

²¹ These clubs also violate New York State law. N.Y. Exec. Law § 296. Further, they also violate Fordham’s own nondiscrimination policy. *See* <https://www.fordham.edu/about/leadership-and-administration/administrative-offices/title-ix-office/non-discrimination-policy/> [<https://archive.is/wip/ygi2y>] (accessed September 25, 2025).

Recent federal guidance underscores the illegality of the sex-based preferences like those challenged here. On July 29, 2025, the Attorney General issued a memorandum to all federal agencies clarifying that recipients of federal funds must not engage in discriminatory practices based on race, sex, or other protected characteristics, regardless of labels such as “Diversity, Equity, and Inclusion.”²² The memorandum specifically identifies as unlawful the creation of race- or sex-exclusive scholarships, internships, mentorships, leadership initiatives, or affinity groups, as well as the segregation of facilities or resources based on protected traits.

Fordham’s Girl Boss programs fall squarely within these prohibited practices, as they condition eligibility and participation on sex and distribute educational and career benefits on a discriminatory basis. OCR therefore has both the authority and obligation to enforce federal nondiscrimination law, particularly in light of this updated guidance.

OCR Has Jurisdiction

Fordham is a private university that receives federal funds, including from the U.S. Department of Education.²³ It is therefore liable for violating Title IX, and OCR has jurisdiction over this complaint.

The Complaint Is Timely

This complaint is timely brought because it includes allegations of discrimination based on sex that occurred within 180 days and that is ongoing. These programs are currently active.²⁴

Request For Investigation And Enforcement

The discrimination outlined above is presumptively illegal because it imposes sex-based restrictions on educational opportunities at an institution funded with federal dollars. Such restrictions directly violate Title IX by denying students the chance to compete on equal terms without individualized consideration or lawful justification.

OCR therefore has both the power and the obligation to investigate Fordham’s role in creating, funding, and administering the Girl Boss programs, and to determine whether similar practices exist elsewhere at the university. Where violations are found, OCR may impose fines, suspend or terminate federal financial assistance, or refer the matter to the Department of Justice

²² https://www.justice.gov/ag/media/1409486/dl_https://archive.is/hsmXI] (accessed September 25, 2025).

²³ See https://www.usaspending.gov/award/ASST_NON_P063P241847_091 [<https://archive.is/o24L1>] (accessed September 25, 2025).

²⁴ <https://www.fordham.edu/gabelli-school-of-business/student-and-career-resources/undergraduate-student-resources/student-organizations/girl-boss-fordham-undergraduate-women-in-business/> [<https://archive.ph/n5MUv>] (Accessed September 25, 2025).

for judicial enforcement. As the Supreme Court has made clear, “[t]he way to stop discrimination ... is to stop discriminating.” *Parents Involved in Cmty. Sch.*, 551 U.S. at 748.

Accordingly, we respectfully ask that the Department of Education’s Office for Civil Rights promptly open a formal investigation, impose such remedial relief as the law permits for the benefit of those who have been illegally excluded from Fordham’s various programs based on discriminatory criteria, and ensure that all ongoing and future programming at Fordham comports with 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
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