



THE EQUAL PROTECTION PROJECT
A Project of the Legal Insurrection Foundation
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BARRINGTON, RI 02806
www.EqualProtect.org

November 7, 2025

BY EMAIL (OCR@ed.gov)

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

BY EMAIL (OCR.Seattle@ed.gov)

Seattle Office
Office for Civil Rights
U.S. Department of Education
915 Second Avenue Room 3310
Seattle, WA 98174-1099

Re: Civil Rights Complaint Against University of California, Los Angeles

Dear Ms. Richey and OCR Staff:

This is a federal civil rights complaint pursuant to the U.S. Department of Education's Office for Civil Rights ("OCR") discrimination complaint resolution procedures.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 the University of California, Los Angeles ("UCLA"), for offering, administering, and promoting thirteen (13) scholarships that discriminate on the basis of 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.

UCLA offers a wide range of scholarships for both admitted and current students.² All applicants must sign in using their “MyUCLA” login credentials. Most scholarships use a single application that allows students to be considered for multiple awards.



[Sign In](#)

▼ Opportunities

Our Opportunities

Show Filters

Welcome to the UCLA Scholarship Application!

Please click the “SIGN IN” button to begin or update your application! Required questions take only 15-30 minutes to complete, which will allow a variety of UCLA schools and departments to consider you for more than 2000 scholarships in the portal!

This website provides UCLA students the opportunity to apply for UCLA merit-based and need-based gift aid. These include, but are not limited to, scholarships, fellowships, stipends, grants, and prizes.

- All students in good academic standing should submit an application, as most scholarships have no GPA requirement.
- Award recipients are expected to maintain [Satisfactory Academic Progress](#) in order to continue to receive renewable awards.
- For those awards that take financial need into consideration, please maximize your opportunities by submitting your FAFSA or Dream Act application by the priority deadline (usually March 2) each year.
- College and department awards open at different times throughout the year, so check back frequently to look for new opportunities, update your profile, etc.
- **Prospective students cannot begin an application until after they received notice they have been admitted.**

Note: UCLA administers all *Identity-Conscious Financial Aid* in compliance with federal, state, and university regulations by using “Pool and Match” applications for unrestricted awards, identity conscious awards, and other restricted awards (major, need, community service, etc.). *Identity conscious awards may include a preference for a student’s race, sex (including gender identity and sexual orientation for purposes of this policy), color, ethnicity, or national origin.* These pooled applications allow students to submit a single application to be considered for multiple scholarships, and are used in determining the source of a recipient’s aid, but not their eligibility, receipt, and amount of financial aid. For full details, please visit the UC Office of the President website [Presidential Policies on Student Matters](#).

In spring, most current award applications are for the upcoming summer or academic year, but you may also receive award offers for the current academic year (Commencement awards, etc.). Your Bruin Financial Aid Letter (BFAL) will identify *when* the award will be applied to your BruinBill as well as any award *adjustments* made to older awards “locked” in this portal. Your BFAL will always be the final authority on your award amount and disbursement schedule.

Search by Keyword

The scholarships listed below are currently offered to UCLA students and applicants for admission, according to the UCLA website, and violate Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations³ by discriminating against students based on their race and skin color, Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations⁴ by discriminating against students based on their sex, or both.⁵ Because UCLA is a public university, these discriminatory scholarships also violate the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution.

² <https://ucla.academicworks.com/> [<https://archive.is/wip/YpV1Z>] (accessed November 5, 2025).

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

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

⁵ Discriminatory criteria highlighted below.

I. SCHOLARSHIPS THAT VIOLATE TITLE VI (8)

1. Dr. Bertram L. Ashe UBAA Alumni Scholarship

Link:

<https://ucla.academicworks.com/opportunities/114528#:~:text=UCLA%20Alumni%20Scholarships%20Program%20in,Financial%20Aid%20%26%20Scholarships%20Office>

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

Discriminatory Requirement: “Preference shall be given to students who self- identify as part of the **African American** community...”

▼ Opportunities			
Dr. Bertram L. Ashe UBAA Alumni Scholarship The <i>Dr. Bertram L. Ashe UBAA Alumni Scholarship</i> was established in 2018 by Bertram L. Ashe to support scholarships for undergraduate students through the UCLA Alumni Scholarships Program in partnership with the UCLA Black Alumni Association. Preference shall be given to students who self- identify as part of the African American community, and/or who are pursuing a degree in African American-related studies, and/or have demonstrated leadership and involvement in African American related community service . Preference shall also be given to students who are first generation to attend college, and have demonstrated financial need as determined by the UCLA Financial Aid & Scholarships Office. This leadership and merit award is under the Alumni Scholarships Program. A full list of benefits and responsibilities can be found on the program website. <i>Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a “pool and match” application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student’s race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit an Alumni Scholarship application on the prospective student portal to be considered for multiple scholarships, and are used in determining the source of a recipient’s aid, but NOT their eligibility, receipt, or amount of financial aid.</i> <table><tbody><tr><td>Award</td></tr><tr><td>Varies</td></tr><tr><td>Deadline</td></tr></tbody></table> You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.	Award	Varies	Deadline
Award			
Varies			
Deadline			

2. UCLA Latino Alumni Association Endowed Alumni Scholarship

Link:

<https://ucla.academicworks.com/opportunities/114608#:~:text=The%20UCLA%20Latino%20Alumni%20Association,LatinX%20freshmen%20and%20transfer%20students>

Archived Link: <https://archive.ph/wip/7MfcG>

Discriminatory Requirement: “The UCLA Latino Alumni Association Endowed Alumni Scholarship was established in 1999 by the UCLA Latino Alumni Association for incoming **LatinX freshmen and transfer students.**”

▼ Opportunities

UCLA Latino Alumni Association Endowed Alumni Scholarship

The UCLA Latino Alumni Association Endowed Alumni Scholarship was established in 1999 by the UCLA Latino Alumni Association for incoming LatinX freshmen and transfer students.

This leadership and merit award is under the Alumni Scholarships Program. A full list of benefits and responsibilities can be found on the [program website](#).

Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a "pool and match" application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student's race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit an Alumni Scholarship application on the prospective student portal to be considered for multiple scholarships, and are used in determining the source of a recipient's aid, but NOT their eligibility, receipt, or amount of financial aid.

Award
Varies
Deadline

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

3. Asia Pacific Alumni Network Alumni Scholarship: Sam Law Leadership Award

Link:

<https://ucla.academicworks.com/opportunities/115179#:~:text=The%20Asia%20Pacific%20Alumni%20Network,welfare%20of%20the%20API%20community>

Archived Link: <https://archive.ph/wip/Pfw8m>

Discriminatory Requirement: “The Asia Pacific Alumni Network Alumni Scholarship: Sam Law’83 Leadership Award was established in 2002 by the Asian Pacific Alumni of UCLA for **incoming Asian Pacific freshmen** with proven leadership and vision, ethics, community service and coalition building skills concerning the welfare of the API community.”

▼ Opportunities
Asia Pacific Alumni Network Alumni Scholarship: Sam Law Leadership Award The Asia Pacific Alumni Network Alumni Scholarship: Sam Law⁸³ Leadership Award was established in 2002 by the Asian Pacific Alumni of UCLA for incoming Asian Pacific freshmen with proven leadership and vision, ethics, community service and coalition building skills concerning the welfare of the API community. This leadership and merit award is under the Alumni Scholarships Program. A full list of benefits and responsibilities can be found on the program website. <i>Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a "pool and match" application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student's race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit an Alumni Scholarship application on the prospective student portal to be considered for multiple scholarships, and are used in determining the source of a recipient's aid, but NOT their eligibility, receipt, or amount of financial aid.</i> Award Varies Deadline
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.

4. **Pilipino Alumni Association Alumni Scholarship**

Link:

<https://ucla.academicworks.com/opportunities/117538#:~:text=The%20Pilipino%20Alumni%20Association%20Scholarship,membership%20in%20the%20Pilipinx%20community>

Archived Link: <https://archive.ph/wip/VDYZ9>

Discriminatory Requirement: “The Pilipino Alumni Association Scholarship Endowment was established in 2005 by The UCLA Pilipino Alumni Network for incoming transfer students who indicate their support, involvement, self-identification, or **membership in the Pilipinx community**.”⁶

⁶ This scholarship and certain others violate Title VI because members of a racial or ethnic group automatically are eligible, whereas members of other racial or ethnic groups have to prove additional factors.

▼ Opportunities	
Pilipino Alumni Association Alumni Scholarship	
The Pilipino Alumni Association Scholarship Endowment was established in 2005 by The UCLA Pilipino Alumni Network for incoming transfer students who indicate their support, involvement, self-identification, or membership in the Pilipinx community. This leadership and merit award is under the Alumni Scholarships Program. A full list of benefits and responsibilities can be found on the program website.	
Award	Varies
Deadline	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.	

5. **UCLA Mixed Alumni Association Alumni Scholarship**

Link:

<https://ucla.academicworks.com/opportunities/116810#:~:text=The%20UCLA%20Mixed%20Alumni%20Association,studies%20regarding%20the%20multiracial%20community>

Archived Link: <https://archive.ph/jc3Lv>

Discriminatory Requirement: “The UCLA Mixed Alumni Association Alumni Scholarship was established in 2016 by the UCLA Mixed Alumni Association to award undergraduate scholarships to students who self -identify as part of the **mixed heritage community (e.g. mixed race/multiracial/multicultural/etc.)** or anyone that is interested in pursuing studies regarding the multiracial community.”

▼ Opportunities	
UCLA Mixed Alumni Association Alumni Scholarship	
The UCLA Mixed Alumni Association Alumni Scholarship was established in 2016 by the UCLA Mixed Alumni Association to award undergraduate scholarships to students who self -identify as part of the mixed heritage community (e.g. mixed race/multiracial/multicultural/etc.) or anyone that is interested in pursuing studies regarding the multiracial community. This leadership and merit award is under the Alumni Scholarships Program. A full list of benefits and responsibilities can be found on the program website. <i>Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a “pool and match” application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student’s race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit an Alumni Scholarship application on the prospective student portal to be considered for multiple scholarships, and are used in determining the source of a recipient’s aid, but NOT their eligibility, receipt, or amount of financial aid.</i>	
Award	Varies
Deadline	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.	

6. **UCLA Undocumented Alumni Association Scholarship**

Link:

<https://ucla.academicworks.com/opportunities/119883#:~:text=The%20UCLA%20Undocumented%20Alumni%20Association,through%20the%20Alumni%20Scholarships%20Program>

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

Discriminatory Requirement: “The UCLA Undocumented Alumni Association Scholarship fund was established in May 2019 to award scholarships through the UCLA Office of Financial Aid to **undocumented undergraduate students** under current law through the Alumni Scholarships Program.”⁷

▼ Opportunities
UCLA UNDOCUMENTED ALUMNI SCHOLARSHIP The UCLA Undocumented Alumni Association Scholarship fund was established in May 2019 to award scholarships through the UCLA Office of Financial Aid to undocumented undergraduate students under current law through the Alumni Scholarships Program. Award \$6K over 2 or 4 years. Deadline You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.

7. **Mangasarian Scholarship Fund**

Link:

<https://ucla.academicworks.com/opportunities/119108#:~:text=The%20Mangasarian%20Scholarship%20Fund%20was,www.familysearch.org>

Archived Link: <https://archive.ph/wip/oaO8X>

Discriminatory Requirement: “The Mangasarian Scholarship Fund was established in 1978 to provide undergraduate scholarships and graduate fellowships to needy students who are of **Armenian descent**. Applicants may provide evidence that one parent is Armenian (e.g., copy of a parent’s birth certificate, copy of a parent’s passport, a notarized letter from the parent stating that he/she is Armenian, religious documents [certificate of baptism, confirmation, marriage] or letter from church official, confirmation of Armenian heritage from an Armenian association, documentation of heritage through published Armenian Genocide books, family tree [www.familysearch.org]).”

⁷ Scholarships open only to “undocumented” students discriminate against American-born students, a form of national origin discrimination. <https://www.ed.gov/about/news/press-release/us-department-of-education-opens-investigations-five-universities-alleged-exclusionary-scholarships-benefitting-illegal-alien-students>.

▼ Opportunities

Mangasarian Scholarship Fund

The *Mangasarian Scholarship Fund* was established in 1978 to provide undergraduate scholarships and graduate fellowships to needy students who are of Armenian descent. Applicants may provide evidence that one parent is Armenian (e.g., copy of a parent's birth certificate, copy of a parent's passport, a notarized letter from the parent stating that he/she is Armenian, religious documents [certificate of baptism, confirmation, marriage] or letter from church official, confirmation of Armenian heritage from an Armenian association, documentation of heritage through published Armenian Genocide books, family tree [www.familysearch.org]).

Award
Varies

Deadline
06/03/2025

Supplemental Questions

1. Armenian Descent
 - o a. Applicants may provide evidence that at least one parent is Armenian
 - o b. Armenian Documentation

8. **Stepan Azirian Scholarship in Armenian Studies**

Link:

<https://ucla.academicworks.com/opportunities/116468#:~:text=Preference%20should%20be%20given%20to,to%20those%20of%20Armenian%20descent>

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

Discriminatory Requirement: “Preference should be given to undergraduates of Armenian descent.”

▼ Opportunities

Stepan Azirian Scholarship in Armenian Studies

The **Stepan Azirian Scholarship in Armenian Studies** was established in 2017 by Anni Azarian Davison to support scholarships up to the cost of attendance for UCLA undergraduate students. Students must have a minimum G.P.A. of 3.0 and are either minoring in Armenian Studies or majoring in Near Eastern Languages and Cultures with a specialization in Armenian Studies in the UCLA Department of Near Eastern Languages and Cultures .

Preference should be given to undergraduates of Armenian descent. If for any reason, students cannot be identified with the above criteria and preferences, it is the donor’s wish that the funds be used to support students in the departments of Linguistics and /or Computer Science with a preference to those of Armenian descent.

Award
Varies

Deadline

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

II. SCHOLARSHIPS THAT VIOLATE BOTH TITLE VI AND TITLE IX (2)

1. UCLA Raza Women's Alumni Scholarship

Link:

<https://ucla.academicworks.com/opportunities/117870#:~:text=UCLA%20Raza%20Women%27s%20Alumni%20Scholarship>

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

Discriminatory Requirement: “The UCLA Raza Women’s Scholarship was established in 1981, with preference for **incoming Latina freshmen and transfer students**.”

▼ Opportunities

UCLA Raza Women's Alumni Scholarship

The **UCLA Raza Women's Scholarship** was established in 1981, with preference for incoming Latina freshmen and transfer students.

This leadership and merit award is under the Alumni Scholarships Program. A full list of benefits and responsibilities can be found on the [program website](#).

Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a “pool and match” application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student's race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit an Alumni Scholarship application on the prospective student portal to be considered for multiple scholarships, and are used in determining the source of a recipient's aid, but NOT their eligibility, receipt, or amount of financial aid.

Award
Varies
Deadline

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

2. Isidore, Rose and Jeannette Bredin Scholarship Fund

Link:

<https://ucla.academicworks.com/opportunities/115432#:~:text=to%20benefit%20under,aland%20For%20first%20generation%20college%20students>

Archived Link: <https://archive.ph/wip/I146E>

Discriminatory Requirement: “The donor has expressed a **preference for female students, particularly underrepresented minorities** and/or first generation college students.”

▼ Opportunities
Isidore, Rose and Jeannette Bredin Scholarship Fund The Isidore, Rose and Jeannette Bredin Scholarship Fund was established in 2018 by the Estate of Jeannette Bredin '67 to support one, or several, scholarships to benefit under-privileged undergraduate students so they can attend UCLA and complete their program under favorable circumstances. The donor has expressed a preference for female students, particularly underrepresented minorities and/or first generation college students. <i>Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a "pool and match" application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student's race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit a single "general" application to be considered for multiple scholarships, and are used in determining the source of a recipient's aid, but NOT their eligibility, receipt, or amount of financial aid.</i> Award Varies Deadline
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.

III. SCHOLARSHIPS THAT VIOLATE TITLE IX (3)

1. Michelle Alyssa Go/Deloitte Foundation Women's Leadership Scholarship

Link:

<https://ucla.academicworks.com/opportunities/118819#:~:text=The%20Michelle%20Alyssa%20Go%2FDeloitte%20Foundation,to%20support%20meritorious%20female%20students>

Archived Link: <https://archive.ph/wip/h94WM>

Discriminatory Requirement: "It is the donor's wish to support meritorious **female students**."

▼ Opportunities
Michelle Alyssa Go/Deloitte Foundation Women's Leadership Scholarship The Michelle Alyssa Go/Deloitte Foundation Women's Leadership Scholarship was established in 2022 to support scholarships for undergraduate students studying Economics with a demonstrated record of leadership or community service. It is the donor's wish to support meritorious female students. <i>Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a "pool and match" application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student's race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit a single "general" application to be considered for multiple scholarships, and are used in determining the source of a recipient's aid, but NOT their eligibility, receipt, or amount of financial aid.</i> Award Varies Deadline
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.

2. **Sera Aintablian Scholarship**

Link:

<https://ucla.academicworks.com/opportunities/118905#:~:text=It%20is%20the%20wish%20of,awarded%20in%20the%20following%20order>

Archived Link: <https://archive.ph/wip/rZeU0>

Discriminatory Requirement: “Highly meritorious female students.”

▼ Opportunities

Sera Aintablian Scholarship

The ***Sera Aintablian Scholarship*** was established in October 2022 to support highly meritorious undergraduate students.

It is the wish of the family that the Sera Aintablian Scholarship be awarded in the following order:

1. Highly meritorious female students.
2. Students with a demonstrated record of leadership or community service, including but not limited to, religious service.
3. Students who matriculate from the following high schools: Holy Martyrs Ferrahian High School, Mesrobian Armenian School, Rose and Alex Pilibos Armenian School and AGBU Manoogian-Demirdjian School.

Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a “pool and match” application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student’s race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit a single “general” application to be considered for multiple scholarships, and are used in determining the source of a recipient’s aid, but NOT their eligibility, receipt, or amount of financial aid.

Award
Varies
Deadline

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

3. **Los Angeles City Panhellenic Association Scholarship Fund**

Link:

<https://ucla.academicworks.com/opportunities/115575#:~:text=The%20Los%20Angeles%20City%20Panhellenic,plan%20on%20entering%20graduate%20work>

Archived Link: <https://archive.ph/wip/K16IK>

Discriminatory Requirement: “The scholarship has since been awarded as a scholarship, to be awarded **preferably to women** who plan on entering graduate work.”

▼ Opportunities	
Los Angeles City Panhellenic Association Scholarship Fund	
The Los Angeles City Panhellenic Association Scholarship Fund (originally as a loan in January 1927) was established in 1940 to assist female students with their education. The scholarship has since been awarded as a scholarship, to be awarded preferably to women who plan on entering graduate work. <i>Note: UCLA administers all identity-conscious financial aid and scholarships in compliance with federal, state, and university regulations by using a "pool and match" application process for unrestricted awards, identity-conscious awards, and other restricted awards (major, need, community service, etc.). Identity-conscious awards may include a preference for a student's race, sex, gender identity, sexual orientation, color, ethnicity, or national origin. The pooled application process allows students to submit a single "general" application to be considered for multiple scholarships, and are used in determining the source of a recipient's aid, but NOT their eligibility, receipt, or amount of financial aid.</i>	
Award	Varies
Deadline	
You will be automatically considered based on your completed General Application. To complete the General Application, please sign in .	

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; Title IX, by discriminating on the basis of sex; or both.⁸ Furthermore, because UCLA 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 UCLA receives and administers federal funds through numerous programs and is a public institution, it is subject to Title VI.⁹

⁸ 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 UCLA. 42 U.S.C. § 2000(a)(a). These scholarships also violate California state law. Cal. Educ. Code § 220 (2024). Finally, these scholarships violate UCLA's own nondiscrimination policy. *See* <https://equity.ucla.edu/bruin-safety-well-being/discrimination-and-harassment/> [<https://archive.is/wip/SdFVd>] (accessed October 29, 2025).

⁹ *See* https://www.usaspending.gov/award/ASST_NON_P015B180161_091 [<https://archive.is/wip/WX0DB>] (accessed October 29, 2025).

Regardless of UCLA's reasons for offering, promoting, and administering such discriminatory scholarships, they are violating Title VI by doing so. It does not matter if the recipient of federal funding discriminates in order to advance a benign "intention" or "motivation." *Bostock v. Clayton Cnty.*, 590 U.S. 644, 661 (2020) ("Intentionally burning down a neighbor's house is arson, even if the perpetrator's ultimate intention (or motivation) is only to improve the view."); accord *Automobile Workers v. Johnson Controls, Inc.*, 499 U.S. 187, 199 (1991) ("the absence of a malevolent motive does not convert a facially discriminatory policy into a neutral policy with a discriminatory effect" or "alter [its] intentionally discriminatory character"). "Nor does it matter if the recipient discriminates against an individual member of a protected class with the idea that doing so might favor the interests of that class as a whole or otherwise promote equality at the group level." *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181, 289 (2023) (Gorsuch, J., concurring).

As UCLA 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, UCLA 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, UCLA 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 UCLA’s scholarships were “imprecise,” “plainly overbroad,” “arbitrary,” “undefined” and “opaque,” 600 U.S. at 216-17,¹⁰ 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

¹⁰ In his concurrence, Justice Thomas criticizes these categories as being “artificial.” *Students for Fair Admissions*, 600 U.S. at 276 (Thomas, J., concurring).

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.

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

OCR Has Jurisdiction

UCLA is a public entity and a recipient of federal funds, including from the U.S. Department of Education.¹¹ 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 sex that occurred within 180 days and that appear to be ongoing. The scholarships are running during the 2025-2026 academic year, and applications are currently active.¹²

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 UCLA 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.

¹¹ See https://www.usaspending.gov/award/ASST_NON_P015B180161_091 [<https://archive.is/wip/WX0DB>] (accessed October 29, 2025).

¹² <https://ucla.academicworks.com/> [<https://archive.is/wip/YpV1Z>] (accessed November 4, 2025).

The Office for Civil Rights has the power and obligation to investigate UCLA's role in creating, funding, promoting and administering these scholarships – and, given how many there are, to discern whether UCLA 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.

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 UCLA's various scholarships based on discriminatory criteria, and ensure that all ongoing and future scholarships and programming at UCLA comports with the Constitution and federal civil rights laws.

Respectfully submitted,

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