



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

December 29, 2025

BY EMAIL

Hon. Harmeet K. Dhillon, Esq.
Assistant Attorney General for Civil Rights
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington DC 20530

Re: Civil Rights Complaint Against Massachusetts Institute of Technology
Regarding “Womxn” Only Programs

Dear Assistant Attorney General Dhillon:

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

We write to request that the Department of Justice open an investigation into Massachusetts Institute of Technology (“MIT”) regarding two of its officially sponsored student organizations and programs for “womxn”¹ — Graduate Womxn in Physics (“GWIP”) and Graduate Womxn in Biology (“gwiBio”)(collectively the “Womxn Programs”), for sex-based

¹ “Womxn” is a term that denotes “a woman (used, especially in [intersectional](https://www.dictionary.com/browse/womxn) feminism, as an alternative spelling to avoid the suggestion of sexism perceived in the spelling sequences *m-a-n* and *m-e-n* , and to be inclusive of trans women and nonbinary people).” Dictionary.com, <https://www.dictionary.com/browse/womxn> [<https://archive.is/awkDF>] (accessed December 12, 2025).

discrimination in violation of Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations.²

As set forth below, both “womxn” programs discriminate against males. Females automatically are included, but males are included only if they demonstrate additional factors, such as being “transgender” or nonbinary. Female students who identify as female are included, but male students who identify as male are not included. Such differing eligibility standards based on whether one is female or male constitute sex-based discrimination in clear violation of Title IX. Additionally, the way in which the programs are titled and promoted signals that the programs are not for males, which itself is a violation of Title IX.

DISCRIMINATORY GRADUATE WOMXN ONLY PROGRAMS

The “womxn” programs challenged in this complaint are part of and promoted by MIT departments and offer extremely valuable benefits including, but not limited to, career development and mentoring, and travel funding.

1. GRADUATE WOMXN IN PHYSICS PROGRAM

GWIP is a department-recognized student organization that provides programming for womxn and womxn-identifying members of the MIT Physics community. MIT describes the group by stating that “Graduate Womxn in Physics (GWIP) aims to build community and support gender diversity among physics graduate students at MIT.”³ The group primarily serves graduate students but “...also connect[s] with womxn faculty, postdocs, and undergraduates in the Physics Department.”

GWIP is an official, department-affiliated student organization.⁴ It is listed among the MIT Physics Department’s student groups and operates with the department’s oversight and funding support.

² EPP previously filed a Title VI and Title IX complaint with the U.S. Department of Education Office for Civil Rights against MIT on May 20, 2024, regarding a program open only to women of color (Case Number 01-24-2259). See <https://legalinsurrection.com/wp-content/uploads/2024/05/OCR-Complaint-Massachusetts-Institute-of-Technology.pdf> [<https://archive.ph/wip/Fi3uL>]. The present complaint is unrelated to the program challenged in Case Number 01-24-2259.

³ <https://web.mit.edu/physics/wphys/who.html> [<https://archive.is/wip/bLNft>] (accessed December 28, 2025).

⁴ <https://physics.mit.edu/academic-programs/physics-student-groups/#:~:text=,UWIP> [<https://archive.ph/wip/DJiGw>] (accessed December 28, 2025).



Graduate Womxn in Physics

A group for transgender women, cisgender women, non-binary people, and gender diverse physics graduate students at MIT

[Home](#) [About GWIP](#) [For current students ▼](#) [For prospective students ▼](#) [Alumni](#) [Photos](#)

About GWIP

Graduate Womxn in Physics (GWIP) aims to build community and support gender diversity among physics graduate students at MIT. We use the umbrella term “womxn” (pronounced wi-muhn) to indicate that transgender women, cisgender women, non-binary people, and gender diverse physics graduate students are all welcome in GWIP.

GWIP hosts a number of social, academic, and outreach events throughout the year. We share casual meals every two weeks. Our faculty advisor, Prof. Anna Frebel, leads a series of [career development workshops](#). We also run a [mentoring program](#) with the MIT Undergraduate Womxn in Physics ([UWIP](#)).

Each semester, GWIP invites and hosts one or two speakers for the [Physics department Colloquium](#). Here are some of our recent colloquium speakers:

Spring 2025: Merav Opher (Boston University)

Fall 2024: Monika Aidelsburger (Max Planck Quantum Optics/LMU)

Spring 2024: Saori Pastore (WUSTL)

Fall 2023: Stefania Gori (UC Santa Cruz), Tracy Northup (Innsbruck)



Physics colloquium by Tracy Northup, November 2023

A. Program Benefits

GWIP offers a range of social, academic, and professional-development programming for its members, including recurring meals, faculty-led workshops, and structured mentoring opportunities. MIT describes these activities as follows: “GWIP hosts a number of social, academic, and outreach events throughout the year. We share casual meals every two weeks. Our faculty advisor, Prof. Anna Frebel, leads a series of career development workshops. We also run a mentoring program with the MIT Undergraduate Womxn in Physics (UWIP).”

[Home](#) [About GWIP](#) [For current students ▼](#) [For prospective students ▼](#) [Alumni](#) [Photos](#)

[Events Schedule](#) [Research](#) [General Exams](#) [Life at MIT](#) [Womxn in Science](#) [Career Development](#) [Mentoring Program](#) [Travel Grant](#) [Organize an Event](#) [Reimbursements](#) [Endorsing](#)

Career Development Workshops

GWIP provides career development workshops led by a faculty advisor, structured around informal discussions with participants. According to MIT: “Our faculty advisor, Prof. Anna Frebel, leads a series of career development workshops. We meet over lunch informally

(and confidentially, if necessary) to discuss topics related to professional development and life as a womxn in physics.”⁵

Career Development Workshops

Our faculty advisor, Prof. Anna Frebel, leads a series of career development workshops. We meet over lunch informally (and confidentially, if necessary) to discuss topics related to professional development and life as a womxn in physics.

Topics:

- Public speaking & communication
- Scientific writing, for different audiences
- How to give great presentations
- Work-life balance (time management, career & family)
- Navigating funding & grant proposals
- Networking & conferences
- Job & postdoc applications
- Communicating with your advisor
- Conflict management & communication with co-workers
- Navigating difficult situations at work
- Imposter syndrome
- Developing outreach projects
- How to find a good advisor
- CV boot camp
- Anything else that comes up!

Mentoring Program

The GWIP mentoring program is described as an informal mentoring opportunity for undergraduate womxn in the MIT Physics Department to connect with graduate student mentors in casual settings such as lunch, coffee, or ice cream. According to the program, it “will pair up one or two interested undergrads with each grad student mentor and provide funding each month to take them to lunch.”⁶

⁵ <https://web.mit.edu/physics/wphys/careerdevelopment.html> [<https://archive.ph/wip/vPy0O>] (accessed December 28, 2025).

⁶ <https://web.mit.edu/physics/wphys/mentoring.html> [<https://archive.ph/wip/R8TEg>] (accessed December 28, 2025).

GWIP-UWIP Mentoring Program

The GWIP-UWIP mentoring program is a friendly, casual, supportive, and fun way for undergrad womxn in the Physics Department at MIT to spend time chatting over lunch, coffee, or ice cream with someone who has survived being a physics major too!

We will pair up one or two interested undergrads with each grad student mentor, and provide funding each month to take them to lunch. It's that simple! If you've ever wished you had someone to give you a little advice about finding a good UROP, answer your questions about what grad school is like, or just assure you that you'll make it through even though you feel overwhelmed with one too many problem sets to finish -- all over an ice cream sundae -- then this program is for you.

For mentees (undergrads):

If you are an undergraduate (or a first year who intends to declare physics) and interested in seeking a mentor for the current year, please apply when we send out the application to UWIP (about once a term).

For mentors (grads):

Mentors should meet with their mentee(s) approximately three times per semester. At least initially, the grad student should take the initiative to set up the meetings. UWIP and GWIP will cover \$15 per person per meeting for up to three meetings per semester. The reimbursement procedure is outlined in an email to mentors at the beginning of each year.

Travel Grant

GWIP's travel grant covers "...travel for womxn MIT graduate students in physics to go to conferences (at which the student is presenting their research) or schools." MIT provides up to \$1,150 for an international conference and \$800 for a US or Canadian conference.⁷

⁷ <https://web.mit.edu/physics/wphys/travel.html> [<https://archive.ph/wip/Swzz3>] (accessed December 28, 2025).

Travel Grant

There is money in the GWIP budget to cover travel for womxn MIT graduate students in physics to go to conferences (at which the student is presenting their research) or schools. This is not to take the place of standard forms of support, but rather is meant to support a student who otherwise would be expected to cover expenses out of their own pocket. GWIP conference funding will only be awarded in cases where the student has exhausted all other funding resources (i.e. advisor or research group, division support, conference grant, [GSC funding](#), etc.). The GWIP conference funding can also be supplementary, in cases where the student can get some but not all funding from other sources. The funding can cover conference fees, lodging at the conference, and transportation to the conference. We will not award food or per diem money. The maximum limits are \$1,150 for an international conference and \$800 for a US or Canadian conference. Reimbursement can only be awarded with valid receipts. In all but extreme cases only one travel grant award will be made per student per year, regardless of amount awarded. Students are limited to up to three travel grants total during their time in grad school.

Cycles for GSC conference grants

Conference period	Application deadline	Notification
July 1 - September 30	May 15	June 1
October 1 - December 31	August 15	September 1
January 1 - March 31	November 15	December 1
April 1 - June 30	February 15	March 1

Procedure for GWIP funding

1. Contact the budget/travel grant committee by emailing gwip-org [at] mit [dot] edu with the subject line "Attention Travel Committee." Briefly explain the situation, and the amount of money requested. Include an explanation of why money is not available from other sources (e.g., this might be something like: "The CTP's policy is to cover only \$500 and the conference I am going to will cost a total of \$800. My advisor does not have any money to help cover this, and there isn't any student support from the conference itself."). Also, tell us what you will be presenting (if attending a conference) and explain how the conference/school will benefit your research goals. Apply well in advance of the proposed travel, preferably at least a month, to receive full consideration. As long as two committee members agree, the application will be considered approved.
2. If approved, the GWIP Travel Committee will forward the application to Sydney Miller and Karma Yangzom along with their comments and instructions for reimbursement.
3. Every effort must be made by the student to minimize the cost of the trip (i.e. booking travel well in advance to ensure the lowest rate, sharing a hotel room with another student if possible, etc.).

Travel grant applications will also be considered for non-conference physics travel (i.e. to work with a collaborator or to give a talk). In nearly all cases we expect this sort of travel would be covered by the MIT research group or the host institution, but in rare cases with sufficient justification, GWIP support may be made available. This sort of funding application will require a more detailed explanation of the situation.

B. Discriminatory GWIP Requirements

GWIP makes clear that the program discriminates against males. Females automatically are included, but males are included only if they demonstrate additional factors, such as being “transgender” or nonbinary.

The program first signals this discrimination through its name, “Graduate Womxn in Physics.” That signal alone is likely to scare away males. The group also codifies this discrimination by defining what it means by “womxn”: “We use the umbrella term 'womxn' (pronounced wi-muhn) to indicate that transgender women, cisgender women, non-binary people, and gender diverse physics graduate students are all welcome in GWIP.”

Throughout this program, MIT specifies that the benefits are for “womxn.” For example, the Mentoring program is “...for undergrad womxn in the Physics Department.”⁸

GWIP-UWIP Mentoring Program

The GWIP-UWIP mentoring program is a friendly, casual, supportive, and fun way for undergrad womxn in the Physics Department at MIT to spend time chatting over lunch, coffee, or ice cream with someone who has survived being a physics major too!

At every level, from promotion to planned implementation, the Graduate Womxn in Physics discriminates against males.

2. GRADUATE WOMXN IN BIOLOGY PROGRAM

MIT describes gwiBio as “...an inclusive group for individuals interested in supporting womxn-identifying, transgender, and non-binary individuals in Biology-related fields at MIT. We are **a safe space for graduate womxn** to develop a sense of belonging and visibility, and to build meaningful connections with staff and faculty in the Biology, Biomedical Engineering, and Brain and Cognitive Sciences departments as well as the surrounding community” (emphasis added).⁹

⁸ <https://web.mit.edu/physics/wphys/mentoring.html> [<https://archive.is/R8TEg>] (accessed December 28, 2025) (Yellow highlighting added throughout).

⁹

<https://sites.mit.edu/gwibio/#:~:text=Graduate%20Womxn%20in%20Biology%20,well%20as%20the%20surrounding%20community> [<https://archive.ph/wip/P53Vv>] (accessed December 28, 2025).



[Who we are](#) [Executive Board](#) [Gallery](#) [Upcoming Events](#) [Contact us](#)

Who we are

Graduate Womxn in Biology (gwiBio) is an inclusive group for individuals interested in supporting womxn-identifying, transgender, and non-binary individuals in Biology-related fields at MIT. We are a safe space for graduate womxn to develop a sense of belonging and visibility, and to build meaningful connections with staff and faculty in the Biology, Biomedical Engineering, and Brain and Cognitive Sciences departments as well as the surrounding community.

A. Program Benefits

MIT states that gwiBio administers several structured programs for “womxn” intended to provide professional development, outreach, and community-building opportunities for participants. According to MIT, “gwiBio runs 3 programs to enhance the experience of MIT womxn in Biology-related programs – the Glass Shards speaker series, an outreach program, and a community building/mentorship program.” While the gwiBio program asserts that “events” are open to everyone, the programs are intended for “MIT womxn in Biology.”

gwiBio runs 3 programs to enhance the experience of MIT womxn in Biology-related programs – the Glass Shards speaker series, an outreach program, and a community building/mentorship program. **All GwiBio events are open and welcoming to everyone – you do not need to be a graduate student or womxn-identifying to attend and participate!**

Glass Shards speaker series

One component of gwiBio’s programming is a speaker series focused on professional development and career guidance. MIT describes the Glass Shards speaker series as one that “...provides professional development and career guidance opportunities to Biology graduate students by inviting womxn speakers to share their personal experiences in different science-related fields, and has so far included conversations with Biology faculty members, science writers, and a public speaking and presentation skills workshop from the MIT Communication Lab.”

The Glass Shards speaker series provides professional development and career guidance opportunities to Biology graduate students by inviting womxn speakers to share their personal experiences in different science-related fields, and has so far included conversations with Biology faculty members, science writers, and a public speaking and presentation skills workshop from the MIT Communication Lab.

Outreach program

gwiBio also operates an outreach program that expressly targets “womxn-identifying” students and limits its encouragement and mentoring efforts to that group. MIT describes this outreach program as follows: “The outreach program is focused on encouraging womxn-identifying students at local high schools and colleges to pursue futures in science as well as creating opportunities in the broader community to make science more accessible. This program provides an outlet for Biology graduate students to practice science communication and serve as mentors outside the MIT community. Our main outreach activity is a DNA Extraction booth at the Cambridge Science Festival each fall.”

The outreach program is focused on encouraging womxn-identifying students at local high schools and colleges to pursue futures in science as well as creating opportunities in the broader community to make science more accessible. This program provides an outlet for Biology graduate students to practice science communication and serve as mentors outside the MIT community. Our main outreach activity is a DNA Extraction booth at the Cambridge Science Festival each fall.

Community building/mentorship program

The community-building and mentorship program hosts events that bring together womxn-identifying undergraduates, graduate students, postdoctoral researchers, and faculty in biology-related departments for networking, mentorship, and peer support. According to MIT, the program is designed “to develop communities in which participants can meet and foster lasting relationships with new colleagues, benefit from varied forms of guidance and mentorship, and share personal experiences and promote transparency about pursuing different paths in biology.” Examples of recent events include “Speed Friending” and a semester-long book club.

The community building/mentorship program hosts events that bring together womxn-identifying undergraduates, graduate students, post-docs and faculty in biology-related departments to develop communities in which participants can meet and foster lasting relationships with new colleagues, benefit from varied forms of guidance and mentorship, and share personal experiences and promote transparency about pursuing different paths in biology. Examples of recent events include “Speed Friending” and a Semester-long Book Club.

B. Discriminatory Requirements

gwiBio discriminates against males in much the same way as the Graduate Womxn In Physics program, because females are automatically eligible, but males need to show an additional factor such as being “transgender” or nonbinary. The program also signals that it is an exclusive club for non-male students. Its name—“Graduate Womxn in Biology”—signals this restriction, defining “womxn” to include “womxn-identifying, transgender, and non-binary individuals.” Although gwiBio states that its events are “open and welcome to everyone,” the promotion, structure and operation of the program signals and implements discrimination against males and in favor of womxn.

Who we are

Graduate Womxn in Biology (gwiBio) is an inclusive group for individuals interested in supporting womxn-identifying, transgender, and non-binary individuals in Biology-related fields at MIT. We are a safe space for graduate womxn to develop a sense of belonging and visibility, and to build meaningful connections with staff and faculty in the Biology, Biomedical Engineering, and Brain and Cognitive Sciences departments as well as the surrounding community.

Although gwiBio says its events are “open and welcome to everyone...” this does not appear to be the case, and the club and its affiliated programs remain targeted exclusively to womxn. For example, the Glass Shards speaker series “provides professional development” by inviting “womxn speakers” to present—there is no indication that male speakers who identify as male are promoted.

The Glass Shards speaker series provides professional development and career guidance opportunities to Biology graduate students by inviting womxn speakers to share their personal experiences in different science-related fields, and has so far included conversations with Biology faculty members, science writers, and a public speaking and presentation skills workshop from the MIT Communication Lab.

Similarly, the outreach program is “focused on encouraging womxn-identifying students at local high schools and colleges to pursue futures in science,” again showing no effort to include males who identify as male.

The outreach program is focused on encouraging womxn-identifying students at local high schools and colleges to pursue futures in science as well as creating opportunities in the broader community to make science more accessible. This program provides an outlet for Biology graduate students to practice science communication and serve as mentors outside the MIT community. Our main outreach activity is a DNA Extraction booth at the Cambridge Science Festival each fall.

Further, the community-building and mentorship program “hosts events that bring together womxn-identifying undergraduates, graduate students, post-docs, and faculty,” confirming that participation is limited to “womxn.”

The community building/mentorship program hosts events that bring together womxn-identifying undergraduates, graduate students, post-docs and faculty in biology-related departments to develop communities in which participants can meet and foster lasting relationships with new colleagues, benefit from varied forms of guidance and mentorship, and share personal experiences and promote transparency about pursuing different paths in biology. Examples of recent events include “Speed Friending” and a Semester-long Book Club.

Taken together, these programs demonstrate that gwiBio discriminates against males both in the way in which they are promoted and in substance.

The Womxn Programs Violate The Law

The Womxn programs identified above violate Title IX, by discriminating on the basis of sex.

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 like MIT receiving federal funding,¹⁰ including from the Department of Justice,¹¹ 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).¹²

The Womxn Programs discriminate on the basis of sex because eligibility is conditioned on whether an individual is male or female, notwithstanding the use of gender-identity terminology. Under the programs’ own definitions, females are automatically eligible for

¹⁰ <https://www.usaspending.gov/recipient/959819d4-fcbb-189c-44a9-a2fc0644251a-C/latest> [<https://archive.is/wip/CCf4q>] (accessed December 18, 2025).

¹¹ https://www.usaspending.gov/award/CONT_AWD_15F06718P0006714_1549_-NONE_-NONE- [<https://archive.is/wip/vCI3V>] (accessed December 18, 2025).

¹² These programs also violate Massachusetts State law. Mass. Gen. Laws ch. 151C (2024). Further, they also violate MIT’s own nondiscrimination policy. *See* <https://policies.mit.edu/policies-procedures/90-relations-and-responsibilities-within-mit-community/94-nondiscrimination> [<https://archive.is/wip/gO2WZ>] (accessed December 11, 2025).

participation, while males are excluded unless they disclaim or redefine their sex. This structure necessarily conditions access to educational benefits on sex, because eligibility turns on whether an individual is male or female. Title IX does not permit federally funded institutions to discriminate against males while granting automatic inclusion to females under the guise of “gender-inclusive” language. Discrimination that operates against males as a class—regardless of the labels used—constitutes sex-based discrimination prohibited by Title IX.¹³

It makes no difference that MIT attempts to cover its tracks by inserting that events for gwiBio are open to all. In its July 2025 guidance, the Department of Justice made clear that recipients of federal funds may not engage in discrimination based on protected characteristics while attempting to insulate such conduct through facially neutral claims that a program is “open to all.” DOJ explained that programs whose structure, eligibility criteria, or implementation segregate or exclude individuals based on protected traits remain unlawful notwithstanding inclusive labels.¹⁴

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 Womxn 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

¹³ Cf., *Bostock v. Clayton County*, 590 U.S. 644, 659–60 (2020) (holding under Title VII that discrimination is “because of sex” where sex is a but-for cause of the challenged action, and explaining that a statutory violation occurs whenever changing an individual’s sex would change the outcome). Here, participation in the Programs turns on whether an individual is male or female—either through automatic inclusion of biological females or exclusion of biological males unless they redefine their sex—making sex a but-for cause of eligibility.

¹⁴ See, <https://www.justice.gov/ag/media/1409486/dl?> [<https://archive.is/wip/UxSv0>] (accessed December 28, 2025).

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).

Recent federal guidance underscores the illegality of the sex-based preferences like those challenged here. On July 29, 2025, the U.S. 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.”¹⁵ The memorandum states that “entities receiving federal funds ... must ensure that their programs and activities comply with federal law and do not discriminate on the basis of race, color, national origin, sex, religion, or other protected characteristics—no matter the program’s labels, objectives, or intentions,” and that the use of terms such as “DEI,” “equity,” or other euphemistic terms “does not excuse unlawful discrimination or absolve parties from scrutiny regarding potential violations.”

The MIT Womxn programs fall squarely within these prohibited practices, as they promote and condition eligibility and participation on sex and distribute educational and career benefits on a discriminatory basis. DOJ therefore has both the authority and obligation to enforce federal nondiscrimination law, particularly in light of this updated guidance.

Request For Investigation And Enforcement

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

The DOJ therefore has both the power and the obligation to investigate MIT’s role in creating, funding, and administering the Womxn programs, and to determine whether similar practices exist elsewhere at the university. Where violations are found, the DOJ may seek 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 Justice’s Civil Rights Division promptly open a formal investigation, seek such remedial relief as the law permits for the benefit of those who have been illegally excluded from MIT’s womxn programs based on discriminatory criteria, and ensure that all ongoing and future programming at MIT comport with federal civil rights laws.

¹⁵ See, <https://www.justice.gov/ag/media/1409486/dl> <https://archive.is/hsmXI>] (accessed December 28, 2025).

U.S. Dept. of Justice, Civil Rights Division
Civil Rights Complaint – Massachusetts Institute of Technology “Womxn” Only Programs
December 29, 2025
Page 14 of 14

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