



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

June 29, 2026

BY EMAIL (OCR@ed.gov)

Kimberly Richey, Assistant Secretary
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 Southern California and Loyola Marymount University Regarding Discriminatory Youth Leadership Institute and Request for DOJ Referral

Dear Assistant Secretary Richey and OCR Staff:

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

We bring this civil rights complaint against the University of Southern California ("USC") and Loyola Marymount University ("LMU"), both private institutions, for their sponsorship and facilitation of the Youth Leadership Institute ("YLI") program for Hispanic students which discriminates based on national origin in violation of Title VI and Title II. We

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

request that this case – or at least the Title II violation – be referred to the Department of Justice for investigation, pursuant to statutory authority and the June 2026 Interagency Agreement between the Department of Education and DOJ.²

YLI is run by an outside non-profit but USC and LMU materially support and participate in YLI. The universities host program events, provide on-campus housing and other facilities, promote the program, furnish speakers and university personnel, make classroom and meeting space available, and provide other institutional resources that facilitate the program's operation. Accordingly, USC and LMU are legally liable for the discrimination that takes place on their campuses with their support through YLI.

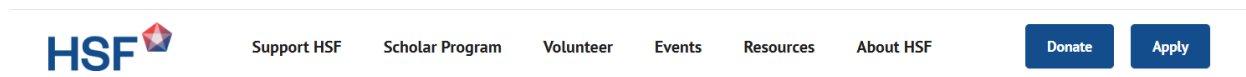
USC AND LMU PARTICIPATION IN THE YOUTH LEADERSHIP INSTITUTE VIOLATES TITLE VI

YLI limits participation to students who identify as Hispanic.

Link: <https://www.hsf.net/youth-leadership-institute>

Archived Link: <https://archive.is/wip/jR812>

Discriminatory Requirement: “The Youth Leadership Institute is open to students of all races that identify as being of Hispanic Heritage”



Student Eligibility:

- The Youth Leadership Institute is open to students of all races that identify as being of Hispanic Heritage
- Current high school junior at the time of application (Class of 2027)
- Must have an unweighted cumulative GPA above a 3.0 on a 4.0 (or equivalent)
- Currently attends high school in the United States or a US Territory
- Must be a U.S. Citizen, Permanent Legal Resident, or DACA
- Plan to enroll full-time in an accredited, public or not-for-profit, four-year university in the US after high school graduation

² <https://www.ed.gov/media/document/ed-and-doj-interagency-agreement-ocr-partnership-61526-114243.pdf>

According to YLI, the program is a college-access and leadership-development program for Latino students. YLI describes itself as “a free, college empowerment program for high-achieving Latino high school juniors, held virtually and at two top universities across the U.S.”³ YLI is a program of the Hispanic Scholarship Fund (“HSF”), which administers and operates the program.⁴

The Hispanic Scholarship Fund is a nonprofit organization founded in 1975 that provides scholarships, educational programs, and support services for Hispanic students.⁵ HSF describes its mission as empowering Hispanic students and parents to successfully complete higher education and its vision as fostering a highly educated and influential Hispanic community. YLI is a creation of HSF and was first offered in 2004.⁶

Participants in YLI receive a variety of educational, leadership, and career-development benefits. According to YLI, students participate in college-preparation programming, leadership training, mentorship opportunities, and career exploration activities. The program also provides participants with opportunities to engage with university faculty, professionals, and peers from across the country, helping students develop academic, professional, and leadership skills while preparing for college and future careers.⁷

Youth Leadership Institute (YLI)

The YLI Phase I application closed on February 9, 2026. Submissions for the 2026 YLI are no longer being accepted.

YLI is a free, college empowerment program for high achieving Latino high school juniors, held virtually and at two top universities across the US. This highly selective program is designed to give young leaders the practical tools they need to successfully apply to top universities, have full access to scholarship and financial aid opportunities, and set a course for academic and career success. Attendees will enhance their leadership abilities and expand their professional networks by participating in college and career workshops and interacting with college students and professionals who serve as their mentors.

³ <https://www.hsf.net/youth-leadership-institute> [<https://archive.is/wip/jR8l2>] (accessed June 22, 2026).

⁴ <https://www.hsf.net/event-calendar> [<https://archive.is/YA5xk>] Accessed June 26, 2026).

⁵ <https://www.hsf.net/about-hsf> [<https://archive.is/wip/Hjfiy>] (accessed June 22, 2026).

⁶ https://s3-us-west-2.amazonaws.com/hsf-public-assets-new/YLI_2020_FAQ_Students.pdf

⁷ Id.

For 2026, the on-campus in-person YLI programs are being held at USC and Loyola Marymount.

IN-PERSON COMPONENT DATES & LOCATIONS (required)

HSF will be hosting the in-person component of YLI 2026 at:

-YLI #1 (Loyola Marymount University): Wednesday, June 24, 2026 – Sunday, June 28, 2026

-YLI #2 (University of Southern California): Wednesday, July 15, 2026 – Sunday, July 19, 2026

UNIVERSITY OF SOUTHERN CALIFORNIA

USC is hosting one of the two in-person components of YLI. This event runs at the USC campus from July 15, 2026, through July 19, 2026.⁸ USC hosts YLI on its campus annually,⁹ including also in 2024 and 2025.¹⁰

In a 2019 post published by the Office of the Provost, USC stated: "We are proud to be educational partners with the Hispanic Scholarship Fund to help provide a primer on college admissions for Hispanic students." USC further reported that it previously hosted the third annual HSF YLI in 2019 on its campus and described the program as one in which "high-achieving students learn the ins and outs of applying to top-tier universities that may have been considered unattainable."¹¹

⁸ <https://www.hsf.net/youth-leadership-institute> [<https://archive.is/wip/jR8l2>] (accessed June 22, 2026).

⁹ See

<https://www.facebook.com/HispanicScholarshipFund/posts/pfbid02ricPYY5cPyZVfPiNDiyMSUykeMwuCqxjtiHCkars7c8zSZB9gKQ7G8cZSWFmf6msl> [<https://archive.is/zd47a>];
<https://www.facebook.com/HispanicScholarshipFund/posts/pfbid02Ru19QyAUdS4WPGAsb6Ca6iXgB1mXPiEmTAcYUHzuF9xfUoZfrNj6pXvWEjEoHxbpl> [<https://archive.is/wip/v4kBZ>]
(accessed June 28, 2026).

¹⁰ <https://www.hsf.net/yli-usc-2024> [<https://archive.is/Tuyh2>] (accessed June 28, 2026);
<https://www.hsf.net/yli-usc-2025> [<https://archive.is/zFY4R>] (accessed June 28, 2026).

¹¹ <https://www.provost.usc.edu/we-are-proud-to-be-educational-partners-with-the-hispanic-scholarship-fund/> [<https://archive.is/wip/kRqRt>] (accessed June 22, 2026).

We are Proud to be Educational Partners with the Hispanic Scholarship Fund

Published August 6, 2019

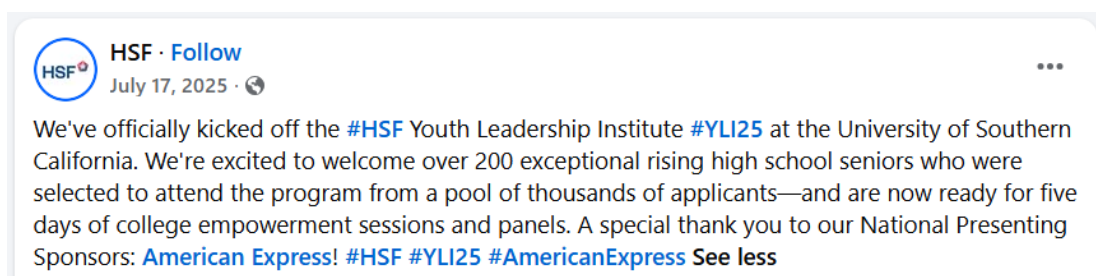


HSF · Follow

June 27, 2024 · 🌐

Thank you, David Glasgow, Assistant Vice Provost for Academic Affairs, [University of Southern California](#) and Salvador Enriquez, Chief of Staff for Diversity, Equity and Inclusion Strategy and Employee Affairs, [Wells Fargo](#) for delivering the opening remarks during the [#HSF 2024 Youth Leadership Institute #YLI24](#) at the [University of Southern California #HSF #WellsFargo #AmericanExpress #USC](#) See less





USC's involvement extends beyond merely providing a venue. USC has hosted the YLI on multiple occasions and continues to serve as an in-person host site, including for the 2026 program.¹²



Youth Leadership Institute - USC (In-Person)

University of Southern California

Jul 15-19, 2026

08:00am - 10:00pm PDT

YLI is a free, college empowerment program for high achieving Latino high school juniors, held virtually and at two top universities across the US. This highly selective program is designed to give young leaders the practical tools they need to successfully apply to top universities, have full access to scholarship and financial aid opportunities, and set a course for academic and career success. Attendees will enhance their leadership abilities and expand their professional networks by participating in college and career workshops, and interacting with college students and professionals who serve as their mentors.

In describing the 2019 YLI held on its campus, USC stated that approximately 200 students participated in the four-day overnight conference. During their time at USC, participants attended college and career workshops designed to help them navigate the college admissions process and prepare for higher education. USC also highlighted that its Vice President of Government Relations, Martha Escutia, participated in welcoming students to the program that year.

USC's Provost Office has described the university as an "educational partner" of the Hispanic Scholarship Fund and, in an official university publication, highlighted the program's objective of increasing the number of Hispanic high school students who attend college.¹³ As an

¹² <https://www.provost.usc.edu/we-are-proud-to-be-educational-partners-with-the-hispanic-scholarship-fund/> [<https://archive.is/wip/kRqRt>] (accessed June 22, 2026).

¹³ <https://highschool.latimes.com/features/lifestyle/finishing-the-youth-leadership-institute-the-hispanic-scholarship-fund-sends-students-off-with-a-purpose/> [<https://archive.is/wip/6Yla0>] (accessed June 22, 2026).

in-person host site, USC provides campus facilities, housing accommodations, speakers, and other institutional resources that support the operation of the YLI.¹⁴

LOYOLA MARYMOUNT UNIVERSITY

LMU is hosting¹⁵ one of the two in-person components of the YLI, from June 24, 2026, through June 28, 2026.¹⁶ As with the USC program, the LMU YLI program is a college-access and leadership-development program for Latino students that provides participants with educational, leadership, and career-development opportunities.

Hispanic Scholarship Fund's Youth Leadership Institute Returns to LMU

FEBRUARY 11, 2025



¹⁴ <https://www.provost.usc.edu/we-are-proud-to-be-educational-partners-with-the-hispanic-scholarship-fund/> [<https://archive.is/wip/kRqRt>] (accessed June 22, 2026).

¹⁵ https://www.instagram.com/p/DaDhhI0mjqN/?img_index=1 [<https://archive.is/wip/t1IpX>] (accessed June 26, 2026).

¹⁶ <https://www.hsf.net/youth-leadership-institute> [<https://archive.is/wip/jR8l2>] (accessed June 22, 2026).



LMU describes itself as a sponsor and host of the program. In announcing the partnership, the Hispanic Scholarship Fund (“HSF”) stated: “HSF has enjoyed a long-standing partnership with LMU, which has generously hosted HSF programs that equip students and parents with essential knowledge on preparing, planning, and paying for college. We are proud and grateful for this collaboration.”¹⁷

LMU likewise highlighted its role in the program. Ashley Okimoto, LMU’s Early Outreach Director, stated: “It is an incredible opportunity to work alongside HSF to provide impactful programming like the Youth Leadership Institute.”¹⁸ LMU hosts the event annually.¹⁹

¹⁷ <https://newsroom.lmu.edu/campusnews/hispanic-scholarship-funds-youth-leadership-institute-returns-to-lmu/> [archive.is/wip/fvD0n] (accessed June 22, 2026).

¹⁸ *Id.*

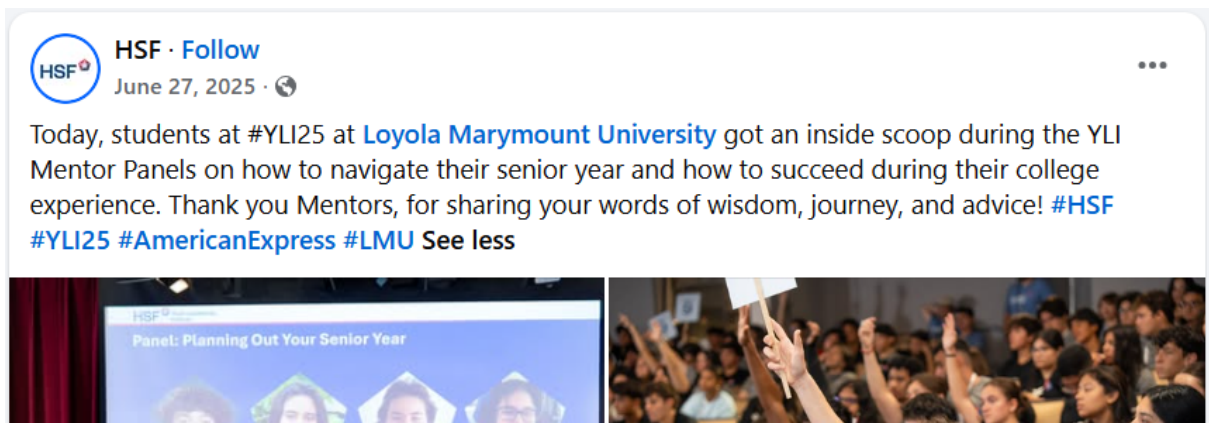
¹⁹ *See*

<https://www.facebook.com/HispanicScholarshipFund/posts/pfbid028dKzL6jbdCQgrst5uGCD8vbv3eMY4qpghBGTvFnwhMFSVS8A7u7vWRhcdirq6fyAl> [<https://archive.ph/wip/yh8q0>]

(accessed June 28, 2026); *See also*

<https://www.facebook.com/HispanicScholarshipFund/posts/pfbid09qsxXUqGcu8P15Ds2kT1z2Ha8s1sgi3vcdXzHX8r2P25MAb5sg2rR9Vi7Fmsxh5Tl> [<https://archive.ph/wip/KN4zk>]

(accessed June 28, 2026).



YLI participants receive direct access to LMU facilities, personnel, and programming. According to LMU, participants stay in LMU residence halls during the program and attend campus tours, networking dinners, and panel discussions featuring representatives from LMU's undergraduate admission, graduate admission, financial aid, and career and professional development offices.²⁰ These activities provide participants with information regarding college

²⁰ Id.

admissions, financial aid, academic opportunities, and career preparation while receiving lodging on LMU's campus for the duration of the in-person program.

LMU's involvement with HSF extends beyond the YLI. Since 2014, LMU has hosted multiple HSF-sponsored college and career readiness programs, including College Camp and Career Connections events. In 2021, HSF recognized LMU as its Educational Partner of the Year.²¹



Youth Leadership Institute - LMU (In Person)

Loyola Marymount University

Jun 24-28, 2026

08:00am - 10:00pm PDT

YLI is a free, college empowerment program for high achieving Latino high school juniors, held virtually and at two top universities across the US. This highly selective program is designed to give young leaders the practical tools they need to successfully apply to top universities, have full access to scholarship and financial aid opportunities, and set a course for academic and career success. Attendees will enhance their leadership abilities and expand their professional networks by participating in college and career workshops, and interacting with college students and professionals who serve as their mentors.

USC AND LMU PARTICIPATION IN THE YLI VIOLATES TITLE VI

USC and LMU participation in the YLI program violates Title VI by discriminating on the basis of national origin. Moreover, this participation violates California's²² own discrimination statutes and the nondiscrimination policies of USC²³ and LMU.²⁴

Title VI of the Civil Rights Act prohibits intentional discrimination on the basis of race, color or national origin in any "program or activity" that receives federal financial assistance. *See* 42 U.S.C. § 2000d. The term "program or activity" means "all of the operations ... of a college, university, or other postsecondary institution, or a public system of higher education." *See* 42 U.S.C. § 2000d-4a(2)(A); *Rowles v. Curators of the Univ. of Mo.*, 983 F.3d 345, 355 (8th Cir. 2020) ("Title VI prohibits discrimination on the basis of race in federally funded programs,"

²¹ *Id.*

²² Cal. Education Code § 66268 (2025).

²³ *Notice of Non-Discrimination – Office of Civil Rights Compliance*, <https://ocrc.usc.edu/policies-and-processes/notice-of-non-discrimination> [<https://archive.is/LcJE2>] (accessed June 28, 2026).

²⁴ (Aug. 27, 2021), <https://www.fire.org/sites/default/files/2021/10/28151934/2021-22-Statement-of-Non-Discrimination.pdf>.

and thus applies to universities receiving federal financial assistance). As both USC and LMU receive federal funds,²⁵ they are subject to Title VI.

In *Students for Fair Admissions, Inc. v. President & Fellows of Harvard College*, 600 U.S. 181 (2023), the Supreme Court declared that “[e]liminating racial discrimination means eliminating all of it The guarantee of equal protection cannot mean one thing when applied to one individual and something else when applied to a person of another color. If both are not accorded the same protection, then it is not equal.” *Id.* at 206 (cleaned up). “Distinctions between citizens solely because of their ancestry [including race] are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.” *Id.* at 208.

Regardless of USC and LMU’s reasons for offering, promoting, and administering such a discriminatory program, 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*, 600 U.S. at 289 (Gorsuch, J., concurring).

YLI is facially discriminatory because it expressly limits participation to students who identify as being of Hispanic heritage. Title VI prohibits discrimination on the basis of race, color, and national origin, and institutions may not avoid those prohibitions through semantic distinctions or alternative terminology, such as “identify as” Here, YLI excludes students who do not satisfy the Hispanic-heritage requirement from the program’s educational, leadership, career-development, and housing benefits.

USC’s and LMU’s involvement in the discriminatory YLI program are presumptively invalid; therefore, their offering, promotion, and administration of this program violates federal civil rights laws.

²⁵ See https://www.usaspending.gov/award/ASST_NON_P063P241192_091 [<https://archive.ph/wip/eGpEK>]; https://www.usaspending.gov/award/ASST_NON_P063P253457_091 [<https://archive.ph/wip/0Xze0>] (accessed June 22, 2026).

**THE PROVISION OF ON-CAMPUS LODGING ALSO VIOLATES TITLE II –
REQUEST FOR REFERRAL TO DOJ**

YLI participants are provided with overnight lodging in university residence halls during the in-person components hosted by USC and LMU.²⁶ Participants stay in campus residence halls while attending the multi-day institute. Because participation in the YLI is expressly limited to students who identify as being of Hispanic heritage, access to those lodging accommodations is likewise conditioned on national origin.

Title II of the Civil Rights Act of 1964 provides that "[a]ll persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation" without discrimination on the ground of race, color, religion, or national origin. 42 U.S.C. § 2000a(a). Title II specifically includes "any inn, hotel, motel, or other establishment which provides lodging to transient guests." *Id.* § 2000a(b)(1). Here, LMU and USC are providing temporary overnight lodging in university residence halls to participants in a short-term program. Access to those lodging accommodations is expressly restricted to students who satisfy the program's Hispanic-heritage requirement. Accordingly, the universities' provision of transient lodging on a discriminatory basis violates Title II independently of their violations of Title VI.

Although OCR does not enforce Title II, the Attorney General is authorized to bring civil actions to enforce that statute. See 42 U.S.C. § 2000a-5. OCR therefore should refer this entire case – or at least the Title II violations -- to the United States Department of Justice for any appropriate investigation and enforcement action pursuant to statutory authority and the June 2026 Interagency Agreement.

OCR HAS JURISDICTION

OCR enforces Title VI of the Civil Rights Act of 1964²⁷ and its implementing regulation,²⁸ which prohibit discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. As recipients of federal financial assistance, including from the Department of Education,²⁹ USC and LMU are subject to Title VI and OCR has jurisdiction over this case.

²⁶ <https://www.hsf.net/youth-leadership-institute> [<https://archive.is/wip/jR812>] (accessed June 22, 2026).

²⁷ 42 U.S.C. §§ 2000d-2000d-7.

²⁸ 34 C.F.R. Part 100.

²⁹ See https://www.usaspending.gov/award/ASST_NON_P063P241192_091 [<https://archive.ph/wip/eGpEK>]; https://www.usaspending.gov/award/ASST_NON_P063P253457_091 [<https://archive.ph/wip/0Xze0>] (accessed June 22, 2026).

THE COMPLAINT IS TIMELY

This complaint is timely brought because it includes allegations of discrimination based on race, color, or national origin that occurred within 180 days and that appears to be ongoing.³⁰

REQUEST FOR INVESTIGATION AND REFERRAL TO DOJ

In *Richmond v. J. A. Croson Co.*, Justice Scalia aptly noted that “discrimination on the basis of race is illegal, immoral, unconstitutional, inherently wrong and destructive of a democratic society.” 488 U.S. 469, 505 (1989) (citation omitted). This is true regardless of which race suffers – discrimination against white applicants is just as unlawful as discrimination against black or other non-white applicants. As Justice Thomas correctly noted in *Students for Fair Admissions*, race-based admissions preferences “fly in the face of our colorblind Constitution and our Nation’s equality ideal” and “are plainly – and boldly – unconstitutional.” 600 U.S. at 287 (Thomas, J., concurring).

USC’s and LMU’s sponsorship, promotion and administration of this program that conditions eligibility on national origin violates Title VI.

The Office for Civil Rights has the power and obligation to investigate USC and LMU’s role in promoting and administering this program and to discern whether USC and LMU are engaging in such discrimination in its other activities – as well as the duty to impose whatever remedial relief is necessary to hold it accountable for this unlawful conduct. This includes, if necessary, imposing fines, initiating administrative proceedings to suspend or terminate federal financial assistance and referring the case to the Department of Justice for judicial proceedings to enforce the rights of the United States under federal law. After all, “[t]he way to stop discrimination ... is to stop discriminating[.]” *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 748 (2007).

Because the Title VI violations are intertwined with the Title II violations, we request that the entire case – or at least the Title II violations – be referred to the U.S. Department of Justice for investigation and any appropriate enforcement action.³¹

³⁰ <https://www.hsf.net/youth-leadership-institute> [<https://archive.is/wip/jR8l2>] (accessed June 22, 2026).

³¹ See Department of Education–DOJ Interagency Agreement <https://www.ed.gov/media/document/ed-and-doj-interagency-agreement-ocr-partnership-61526-114243.pdf>

U.S. Dept. of Education, Office for Civil Rights
Civil Rights Complaint – University of Southern California and Loyola Marymount University
June 29, 2026
Page 14 of 14

Respectfully submitted,

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

/Maureen S. Riordan/
Chief Counsel
Legal Insurrection Foundation
m.riordan@legalinsurrection.com

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