



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

September 9, 2026

BY EMAIL (OCR@ed.gov)

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

BY EMAIL (OCR.DC@ed.gov)

Office for Civil Rights
U.S. Department of Education
400 Maryland Avenue, SW
Room 4E230,
Washington, DC 20202

**Re: Civil Rights Complaint Against Cornell College
Regarding Racially Discriminatory “Each One Teach One Program”**

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 Cornell College (“Cornell”), a private institution, regarding the Each One Teach One Program (“EOTOP” or “the program”) which racially discriminates in violation of Title VI.

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

According to Cornell's website, Each One Teach One Program's goal is to "provide new students of color with an informative introduction to Cornell College that meets their specific needs not covered in New Student Orientation." By its terms the Program is limited based on race, color, and national origin. The Program's stated purpose is to ease student transition from home to the rigors of living and adjusting to a demanding residential community. The Program, through the college's Office of Intercultural Life provides strategies to navigate highly demanding course curriculum and extracurricular activities during the EOTOP orientation. This orientation program is structured to assist in the academic and social development of new students of color, by exposing them to the Cornell College community and many programs and opportunities available to them."²

Each One, Teach One



The mission of the Each One Teach One orientation is to provide new students of color with an informative introduction to Cornell College that meets their specific needs not covered in New Student Orientation.

Program dates

August 14-18, 2026

8 a.m. - 8 p.m. daily (activities and breaks vary)

On and off-campus activities

This free program is capped at 15 qualifying students

² <https://www.cornellcollege.edu/intercultural-life/icl-programs.shtml> [<https://archive.is/uHRCa>] (accessed August 26, 2026).

The EOTOP, described below,³ is currently active according to Cornell’s website⁴, and violates Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations⁵ by discriminating against students based on race, color, or national origin.

EACH ONE TEACH ONE PROGRAM VIOLATES TITLE VI

The EOTOP clearly discriminates on the basis of race, color, or national origin, as it is limited to students “classified as a student of color by the college” including some specified identities such as “African American, Latinx, and American Indian.”⁶

Link: <https://www.cornellcollege.edu/intercultural-life/icl-programs.shtml>
(accessed August 25, 2026).

Archived Link: <https://archive.is/uJcZV>

Discriminatory Requirement: “Any first year student who is **classified as a student of color by the college. Identities included, but not limited to African American, Latinx, and American Indian.**”

The Program is run out of Cornell’s Office of Cultural Life. It is an orientation program limited to students of color that is provided in addition to the orientation program offered to all new students. “The goal of Each One Teach One is to acquaint new students of color with the resources available to them at Cornell and connect them with other students and organizations”. According to the Office of Cultural Affairs the desired outcome for the orientation is to assist in the academic and social development of new students of color, by exposing them to Cornell College community and the programs and opportunities available to them.”⁷

³ Discriminatory criteria are highlighted.

⁴ <https://news.cornellcollege.edu/2026/08/Students-arrive-for-2026-27-academic-year%20.html> [<https://archive.is/6SX3K>](Last accessed September 8, 2026.)

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

⁶ Unless a distinction favoring Indigenous individuals is based on tribal membership, citizenship, or a similar affiliation in a federally recognized tribe, and the preference involves “uniquely Indian interests,” such as Native American lands or treaties, *Doe v. Kamehameha Schs./Bernice Pauahi Bishop Est.*, 470 F.3d 827, 880 (9th Cir. 2006) (en banc), allocating preferences to Indigenous Peoples “as a discrete racial group” is subject to the same legal scrutiny as any other racial classification, *Morton v. Mancari*, 417 U.S. 535, 554 (1974). These exceptions do not apply to this program.

⁷ <https://www.cornellcollege.edu/intercultural-life/icl-programs.shtml> [<https://archive.is/uHRCa>] (Last accessed on August 26, 2026)

The racial discrimination is not subtle: “Eligibility is limited to any first-year student who is classified as a student of color by the college and includes but is not limited to African American, Latinx, and American Indian.”⁸

The foundation of this program is built on mentorship, role modeling, and authentic dialogue. It is in this vein the program took its name after the African proverb Each One Teach One... Each One Reach One.

Who's eligible

Any first year student who is classified as a student of color by the college. Identities included, but not limited to African American, Latinx, and American Indian.

The Each One Teach One Program Violates The Law

The EOTOP violates Title VI by discriminating on the basis of race, color, or national origin.⁹ The EOTOP Program limits eligibility to students from “students of color” As noted above, Cornell states that the program is available to students who have been identified as students of color, including but not limited to African American, Latinx, and American Indian. This language limits eligibility to the program for students from racial and ethnic categories, such that students who do not fall within them—particularly non-minority students are excluded from eligibility.

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,” and thus applies to universities receiving federal financial assistance). As Cornell receives federal funds,¹⁰ it is subject to Title VI.

⁸ <https://www.cornellcollege.edu/intercultural-life/icl-programs.shtml> [<https://archive.is/uHRCa>] (Last accessed on August 26, 2026)

⁹ Although OCR does not enforce Title II of the Civil Rights Act of 1964, that statute makes it unlawful to discriminate on the basis of race or color in a place of “public accommodation,” such as Cornell. 42 U.S.C. § 2000(a). This program also violates Iowa state law. IA Code § 216.1 (2025). Finally, this program violates Cornell’s own nondiscrimination policy. See <https://policy.cornell.edu/policy-library/prohibited-bias-discrimination-harassment-and-sexual-and-related-misconduct> [<https://archive.is/gdjMZ>] (accessed on August 26, 2026).

¹⁰ See https://www.usaspending.gov/award/ASST_NON_P063P251431_091 [(accessed on August 25, 2026)]

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 Cornell’s reasons for offering, promoting, and administering such a discriminatory program, Cornell is violating Title VI by doing so. It does not matter if the recipient of federal funding discriminates in order to advance a benign “intention” or “motivation.” *Bostock v. Clayton Cnty.*, 590 U.S. 644, 661 (2020) (“Intentionally burning down a neighbor’s house is arson, even if the perpetrator’s ultimate intention (or motivation) is only to improve the view.”); *accord Automobile Workers v. Johnson Controls, Inc.*, 499 U.S. 187, 199 (1991) (“the absence of a malevolent motive does not convert a facially discriminatory policy into a neutral policy with a discriminatory effect” or “alter [its] intentionally discriminatory character”). “Nor does it matter if the recipient discriminates against an individual member of a protected class 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).

Cornell’s discriminatory program is presumptively invalid; therefore, its offering, promotion, and administration of this program violates federal civil rights laws.

OCR Has Jurisdiction

OCR enforces Title VI of the Civil Rights Act of 1964¹¹ and its implementing regulation,¹² which prohibit discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, including from the Department of Education,¹³ Cornell is subject to Title VI and OCR has jurisdiction over this case.

¹¹ 42 U.S.C. §§ 2000d-2000d-7.

¹² 34 C.F.R. Part 100.

¹³ See https://www.usaspending.gov/award/ASST_NON_P063P251431_091 (accessed on August 25, 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. This program appears to have been active as of August 2026.¹⁴

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. 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).

Because the discrimination outlined above is presumptively illegal, the fact that it targets eligibility for this program on race, color, and/or national origin violates Title VI.

The Office for Civil Rights has the power and obligation to investigate Cornell’s role in creating, funding, promoting and administering this program and to discern whether Cornell is 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).

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 programming at Cornell based on discriminatory criteria, and ensure that all ongoing and future programs at Cornell comports with the federal civil rights laws.

¹⁴ <https://www.cornellcollege.edu/intercultural-life/icl-programs.shtml> [<https://archive.is/uHRCa>]
(Last accessed on August 26, 2026)

U.S. Dept. of Education, Office for Civil Rights
Civil Rights Complaint – Cornell College
September 9, 2026
Page 7 of 7

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