

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

February 26, 2026

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.Denver@ed.gov)

Denver Office
Office for Civil Rights
U.S. Department of Education
Cesar E. Chavez Memorial Building
1244 Speer Boulevard, Suite 310
Denver, CO 80204-3582

Re: Civil Rights Complaint Against University of Missouri - St. Louis

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 Missouri - St. Louis (UMSL) for offering, administering, and promoting twelve (12) 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.

UMSL offers a wide range of scholarships for both admitted and current students with many only requiring a student to fill out the general admissions application.²

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

Other scholarships require students to complete additional requirements.³ Regardless of the scholarship type, students must meet all requirements to be eligible.



Student Financial Services » Scholarships & Grants

Merit Scholarships and Grants are for Degree Seeking Students enrolled at the University of Missouri-St. Louis. Scholarships may have their own individual additional requirements but all Merit Scholarships are for Degree Seeking Students.

Scholarships and grants are funds that are awarded to students to help them with the costs of their educations. These awards do not have to be repaid. A student may receive a scholarship or grant because of academic merits, financial need, artistic or athletic talents, or for other criteria set forth by scholarship donors. Please advise, the University of Missouri-St Louis does not offer refunds on institutional awards. Scholarships and Grants are an excellent way to fund your education, but you will need to be proactive in locating and applying for them.

The scholarships listed below are currently offered to UMSL students and applicants for admission, according to the UMSL website, and violate Title VI of the Civil Rights Act of 1964 (“Title VI”) and its implementing regulations⁴ by discriminating against students based on their race and skin color, Title IX of the Education Amendments of 1972 (“Title IX”) and its implementing regulations⁵ by discriminating against students based on their sex, or both.⁶ Because UMSL is a public university, these discriminatory scholarships also violate the Equal Protection Clause of the Fourteenth Amendment of the U.S. Constitution.

I. SCHOLARSHIPS THAT VIOLATE TITLE VI (5)

1. Rhonda Knehans-Drake Memorial Scholarship in Data Analytics:

Link: <https://umsl.academicworks.com/opportunities/21166>

Archived Link: <http://archive.today/lorJF>

² <https://umsl.academicworks.com/opportunities/21166> [<http://archive.today/lorJF>] (accessed February 22, 2026).

³ <https://www.umsl.edu/sfs/scholarships-grants/index.html> [<https://archive.is/wip/fb42v>] (accessed February 22, 2026).

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

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

⁶ Discriminatory criteria highlighted below.

Discriminatory Requirement: “In order to achieve the benefits of a diverse student body, preference will be given to students from **underrepresented minority groups.**”⁷

▼ Opportunities	Donors
<p>Rhonda Knehans-Drake Memorial Scholarship in Data Analytics</p> <p>Requirements:</p> <ol style="list-style-type: none">1. Recipients shall be undergraduate or graduate students enrolled full- or part-time in the College of Business Administration at the Campus with an interest in a career in data analytics. <p>Preferences:</p> <ol style="list-style-type: none">1. Preference will be given to students in the last year of their degree program.2. Preference will be given to students who have completed an internship in data analytics or who have taken significant coursework in quantitative data analytics methods.3. In order to achieve the benefits of a diverse student body, preference will be given to students from underrepresented minority groups.4. Preference will be given to students who demonstrate financial need as determined by the Office of Student Financial Aid and the Free Application for Federal Student Aid (FAFSA). <p>Should the University be unable to identify a student who meets the criteria stated herein, an award will be made to a student who most closely fits the above criteria.</p> <hr/> <p>Award Varies</p> <p>Deadline 04/03/2026</p> <p>You will be automatically considered based on your completed General Application. To complete the General Application, please sign in.</p>	

2. Sauter, Vicki Endowed Scholarship in Information Systems and Technology:

Link: <https://umsl.academicworks.com/opportunities/20702>

Archived Link: <http://archive.today/poQvI>

Discriminatory Requirement: “Preference will be given to students from **underrepresented minority groups.**”

⁷ Courts understand the term “minority” to mean non-white racial and ethnic groups. See *Boston Chapter, NAACP, Inc. v. Beecher*, 295 F. Supp. 3d 26, 28 (D. Mass. 2018); see also *Kirkland v. N.Y. State Dep’t of Corr. Servs.*, 552 F. Supp. 667, 674, 677 (S.D.N.Y. 1982); *Arbor Hill Concerned Citizens Neighborhood Ass’n v. Cnty. of Albany*, 281 F. Supp. 2d 436, 455 (N.D.N.Y. 2003); *Coalition to Defend Affirmative Action, Integration and Immigrant Rights and Fight for Equality by Any Means Necessary v. Regents of Univ. of Mich.*, 701 F.3d 466, 493 (6th Cir. 2012).

The screenshot shows a web interface with a red navigation bar at the top containing 'Opportunities' and 'Donors'. The main content area displays the following information:

Sauter, Vicki Endowed Scholarship in Information Systems and Technology
"Scholarship Criteria"
#Undergraduate or Graduate enrolled Full Time (12 Credits) or part time (6 Credit Hours) in the Information Systems and Technology program at The University of Missouri St. Louis.
#Preference will be given to students from underrepresented minority groups.
#Preference will be given to transfer students or incoming freshman.
#Scholarship is renewable as long as the above criteria is met.

Award
Varies

Deadline
04/03/2026

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

3. Swain O'Leary Family Accounting Scholarship

Link: <https://umsl.academicworks.com/opportunities/20328>

Archived Link: archive.is/wip/6ls0m

Discriminatory Requirement: "Second preference given to students who are from an underrepresented minority group."

This screenshot is identical to the one above, showing the same scholarship details for the Sauter, Vicki Endowed Scholarship in Information Systems and Technology.

4. John Works Memorial Scholarship in History

Link: <https://umsl.academicworks.com/opportunities/20906>

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

Discriminatory Requirement: "Recipient will be a member of an under-represented minority. (Current student who identifies as African or African American)"

▼ Opportunities Donors

John Works Memorial Scholarship in History

Scholarship Criteria

1. Enrollment in History B.A., M.A., or minor; African and African Diaspora Studies Certificate; or related degree program.
2. Recipient will be a member of an under-represented minority. (Current student who identifies as African or African American)
3. Good Academic Standing with a minimum 2.5 GPA in the major.

Award
Varies

Deadline
04/03/2026

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

5. **Randy Sanderson Scholarship**

Link: <https://umsl.academicworks.com/opportunities/21040>

Archived Link: <http://archive.today/oq8ms>

Discriminatory Requirement: “Preference will be given to **African American students** who are residents of Saint Louis, Missouri or East Saint Louis, Illinois.”

▼ Opportunities Donors

Randy Sanderson Scholarship

Scholarship Criteria

1. Recipients of this scholarship will be enrolled full time at UMSL (12 credit hours each semester)
2. Candidates will be pursuing a degree in the College of Business Administration.
3. Preference will be given to African American students who are residents of Saint Louis, Missouri or East Saint Louis, Illinois.
4. Preference will be given to students who were participants in the INROADS/St. Louis, Inc. program.
5. Consideration will be given to candidates who complete the Free Application for Federal Student Aid (FAFSA) and demonstrate financial need.
6. Recipients must have a cumulative GPA of 2.5 or better.

Award
\$1,500

Deadline
04/03/2026

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

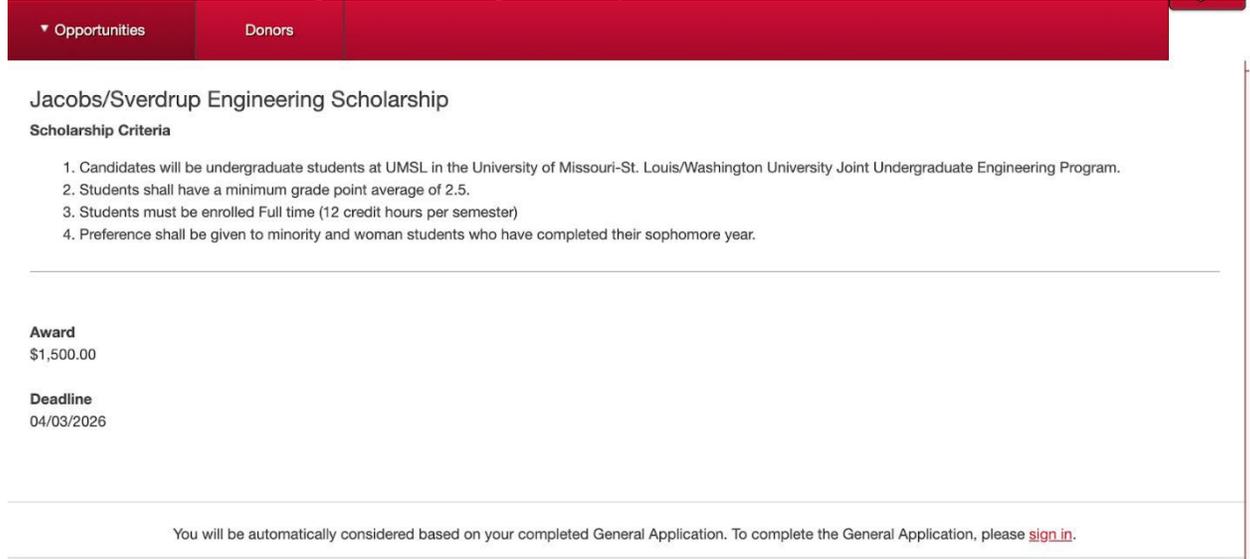
II. **SCHOLARSHIPS THAT VIOLATE BOTH TITLE VI AND IX (1)**

6. **Jacobs/Sverdrup Engineering Scholarship**

Link: <https://umsl.academicworks.com/opportunities/21098>

Archived Link: <http://archive.today/54FyR>

Discriminatory Requirement: “Preference shall be given to **minority and woman students** who have completed their sophomore year.”



▼ Opportunities Donors

Jacobs/Sverdrup Engineering Scholarship

Scholarship Criteria

1. Candidates will be undergraduate students at UMSL in the University of Missouri-St. Louis/Washington University Joint Undergraduate Engineering Program.
2. Students shall have a minimum grade point average of 2.5.
3. Students must be enrolled Full time (12 credit hours per semester)
4. Preference shall be given to minority and woman students who have completed their sophomore year.

Award
\$1,500.00

Deadline
04/03/2026

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 (6)

7. Harriett Woods Leadership Scholarship

Link: <https://umsl.academicworks.com/opportunities/21607>

Archived Link: <https://archive.is/uHPV8>

Discriminatory Requirement: “Preference shall be given to **female students**.”

▼ Opportunities Donors

Harriett Woods Leadership Scholarship

This fund was established by a generous gift from the Honorable Harriett Woods, the first woman to be elected Lt. Governor of Missouri. The fund supports female students who demonstrate academic promise and leadership potential. This scholarship lives on to remember Harriet Woods and to remind all of us of her strong commitment to leadership, particularly in the St. Louis community.

Scholarship Criteria

1. Recipients shall be undergraduates who are enrolled full-time at UMSL (12 hours per semester).
2. Recipients shall be members in good standing with the Pierre Laclède Honors College.
3. Preference shall be given to female students.
4. Recipients shall possess and demonstrate leadership ability and shall have evidence of significant contributions to the community.

Award
\$1,500

Deadline
04/03/2026

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

8. The Hazel L. Kohring Scholarship for Women in Transition

Link: <https://umsl.academicworks.com/opportunities/21820>

Archived Link: <http://archive.today/uNtdi>

Discriminatory Requirement: “Candidates will be displaced **female students** who are 25 years of age or older, who are in transition, and who need to enter or return to the workplace.”

▼ Opportunities Donors

The Hazel L. Kohring Scholarship for Women in Transition

Scholarship Criteria

1. Candidates will be displaced female students who are 25 years of age or older, who are in transition, and who need to enter or return to the workplace.
2. Candidates will be residents of Saint Louis City or County who demonstrate academic promise.

Award
Varies

Deadline
04/03/2026

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

9. University of Missouri - St. Louis Women Scholarship Fund

Link: <https://umsl.academicworks.com/opportunities/21386>

Archived Link: <http://archive.today/o7bOK>

Discriminatory Requirement: “The preferred candidate is a **female student** returning to or continuing in formal education.”

▼ Opportunities Donors

University of Missouri - St. Louis Women Scholarship Fund

Scholarship Criteria

1. Applicants must complete the Free Application for Federal Student Aid (FAFSA) and demonstrate financial need.
2. Candidates must be undergraduate students who enroll at least half-time at UMSL (6 hours per semester).
3. Candidates must have a minimum cumulative 2.5 GPA.
4. The preferred candidate is a female student returning to or continuing in formal education. The scholarship is intended to assist the candidate in successfully undergoing significant life style or career change.

Award
Varies

Deadline
04/03/2026

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

10. **Women in Chemistry Scholarship**

Link: <https://umsl.academicworks.com/opportunities/21522>

Archived Link: <http://archive.today/mRCwD>

Discriminatory Requirement: “Preference will be given to **female students** who are 25 years of age or older who are in transition and need to enter or return to the work place.”

▼ Opportunities Donors

Women in Chemistry Scholarship

Scholarship Criteria

1. Candidates will be undergraduate chemistry majors at UMSL.
2. Candidates will have completed a minimum of 60 credit hours.
3. Preference will be given to female students who are 25 years of age or older who are in transition and need to enter or return to the work place.
4. Preference will be given to candidates who agree to undertake an undergraduate research project under the auspices of a member of the chemistry faculty.

Award
\$500

Deadline
04/03/2026

Supplemental Questions

1. Have you been accepted by a faculty member in Chemistry for work on an undergraduate research project?

11. **Elisabeth Horkits Scholarship Fund**

Link: <https://umsl.academicworks.com/opportunities/21104>

Archived Link: <http://archive.today/G7oBN>

Discriminatory Requirement: “**Women** will receive primary consideration whenever possible.”

▼ Opportunities Donors

Elisabeth Horkits Scholarship Fund

Scholarship Criteria

1. Recipients will be full-time undergraduates at UMSL (12 hours each semester).
2. Women will receive primary consideration whenever possible.
3. Preference will be given to Lindbergh High School graduates.
4. Applicants must complete the Free Application for Federal Student Aid (FAFSA) and demonstrate financial need.

Award
Varies

Deadline
01/09/2026

12. **The Women of AT&T Foundation Endowed Scholarship**

Link: <https://umsl.academicworks.com/opportunities/21419>

Archived Link: <http://archive.today/YY7Bd>

Discriminatory Requirement: “Preference will be given to **female students.**”

▼ Opportunities Donors

The Women of AT&T Foundation Endowed Scholarship

Scholarship Criteria

1. Recipients shall be enrolled as undergraduate students at UMSL.
2. Preference will be given to female students.
3. Candidates must complete the Free Application for Federal Student Aid (FAFSA) and demonstrate financial need.
4. Preference will be given to students who have graduated in the top 20% of their school class or who rank in the top 20% of national scoring tests (e.g., ACT or SAT).
5. Recipient must maintain a minimum GPA of 3.0.
6. Preference will be given to students who reside in the St. Louis metropolitan area.

Award
Varies. Minimum \$400

Deadline
01/09/2026

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 UMSL 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 UMSL receives and administers federal funds through numerous programs and is a public institution, it is subject to Title VI.⁹

Regardless of UMSL’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 UMSL 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

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 UMSL. 42 U.S.C. § 2000a(a). These scholarships also violate Missouri state law. Mo. Rev. Stat. § 213.065 (2024). Finally, these scholarships violate UMSL’s own nondiscrimination policy. See <https://www.umsl.edu/oiec/title-ix/nondiscrimination-statement.html> [<https://archive.is/wip/Jb4es>] (accessed February 22, 2026).

⁹ See https://www.usaspending.gov/award/ASST_NON_U423A180058_091 [<https://archive.is/wip/OfXN1>] (accessed February 22, 2026).

(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, UMSL 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, UMSL 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 UMSL’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

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

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 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.

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

OCR Has Jurisdiction

UMSL 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.

¹¹ *See* https://www.usaspending.gov/award/ASST_NON_U423A180058_091 [<https://archive.is/wip/OfXN1>] (accessed February 22, 2026).

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 UMSL 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.

The Office for Civil Rights has the power and obligation to investigate UMSL’s role in creating, funding, promoting and administering these scholarships – and, given how many there are, to discern whether UMSL 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 UMSL’s various scholarships based on discriminatory criteria, and ensure that all ongoing and future scholarships and programming at UMSL comports with the Constitution and federal civil rights laws.

¹² <https://umsl.academicworks.com/opportunities/21166> [<http://archive.today/lorJF>] (accessed February 22, 2026).

Respectfully submitted,

/William A. Jacobson/

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

/Maureen Riordan/

Maureen Riordan, Esq.
Chief Counsel
Legal Insurrection Foundation
m.riordan@legalinsurrection.com

/Robert J. Fox/

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