



March 3, 2025

VIA EMAIL

Chicago Office
Office for Civil Rights
U.S. Department of Education
John C. Kluczynski Federal Building
230 S. Dearborn Street, 37th Floor
Chicago, IL 60604
OCR.Chicago@ed.gov

Re: Civil Rights Complaint Against the University of Iowa for Violations of Title VI, Title IX, and Recent Trump Administration Directives

Dear Office for Civil Rights,

Young America's Foundation writes to alert you to significant and ongoing civil rights violations against conservative students at the University of Iowa.

Introduction and Basic Principles

Young America's Foundation is a national, conservative nonprofit dedicated to championing traditional values and free speech on college campuses. Students associate with YAF by becoming members and forming YAF chapters. This association enables students to exercise their civil rights in unique ways on campus by conducting activism such as the "Detransitioners Day of Visibility," a YAF project that warns of the dangers of transgenderism and the psychological consequences of "transitioning."¹ YAF activists also host speakers on current issues, such as Matt Walsh for his "What is a Woman" tour. YAF activism spans topics from the sanctity of human life to YAF's "9/11 Never Forget" project, which honors the lives lost in that horrific terror attack. All of this association and expression is protected by the First Amendment, and all of it draws the ire of the campus left.

YAF activists face significant discrimination on campus, where extremist administrators and faculty use so-called and often self-appointed authority to block conservative speech. YAF

¹ <https://yaf.org/detrans/>



provides logistical and legal support to vindicate student speech rights, including filing lawsuits when necessary.²

YAF applauds the Trump Administration's dedication to championing the rights of all students. For too long, leftist administrators have bullied students who challenge evil ideas such as affirmative action and gender transitions. As the leading conservative student organization in America, YAF and our campus activists are in the best position to assist the administration in its efforts to dismantle racist and gender ideology and to rid schools of DEI bullies who set out to harm the very students they are supposed to be serving.

The University of Iowa

On behalf of our YAF members at the University of Iowa (UI) and all truth-seeking students on that campus, YAF requests that you open a formal investigation into UI for its promotion of DEI, racism, and gender ideology in violation of the First Amendment, civil rights laws, and President Trump's executive orders. As specific bases for investigation, YAF submits the following facts:

"Every registered student organization is required to have the UI Human Rights Clause...listed in their constitution." The clause reads as follows (emphasis added):

*In no aspect of its programs shall there be any difference in the treatment of persons on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, **sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual.** The organization will guarantee that equal opportunity and equal access to membership, programming, facilities, and benefits shall be open to all persons. One hundred percent (100%) of this organization's membership must be composed of UI students.*

² See, e.g., *YAF v. University of Utah* (YAF sent a demand letter when University police shut down the YAF Chapter's screening of "Damaged," a documentary about the dangers of transgenderism, to please leftist hecklers who had taken over the chapter's reserved screening room, shouting down the film); *YAF v. University of California, Los Angeles*, Cen. Cal. Dist. Ct., No. 2:24-cv-08507 (complaint filed Oct. 3, 2024) (UCLA administrators blocked the YAF chapter from hosting a peaceful pro-Israel event, supposedly "security" reasons but provided significant security to protect violent anti-Israel encampments); and *Johnson v. University of Colorado, Boulder*, Col. Dist. Ct., No. 1:25-cv-00390 (complaint filed Feb. 5, 2025) (A leftist professor conspired with the DEI office to punish a student for stating opinions on "pride month" with which they disagreed).



UI demands this clause “be written EXACTLY” as stated above (emphasis by UI). The UI YAF chapter was forced to include this clause in their constitution as a condition of recognition and continues to be forced to operate under this constitution to maintain recognition.

Benefits of registration include³:

- Establishment of an account in the Student Organization Business Office (SOBO), or Recreational Services and appropriate purchasing privileges in accordance with University policies;
- Eligibility to apply for funds from mandatory Student Activity fees (i.e., for student organizations) or Recreational Services fees (i.e., for sports clubs);
- Inclusion in appropriate University publications;
- Utilization of the University of Iowa student organization platform (funded by USG & GPSG)
- Utilization of the University’s trademarks in accordance with the UI Trademark Licensing Department’s program and policies;
- Eligibility for use of campus meeting facilities and outdoor spaces;
- Eligibility, but not the right, to utilize UI Fleet Services vehicles in accordance with state and University policies, procedures, guidelines, and insurance requirements;
- Eligibility, but not the right, to utilize University staff and programming resources;
- Eligibility, but not the right, to utilize Information Technology Services Mass Mail twice each semester;
- Eligibility to apply for awards and honors presented to University registered organizations and members; and
- Eligibility to apply for Student Organization Office Suite (SOOS) or Student Activity Center (SAC) office space and/or storage space.

Without recognition, student organizations lose access to these important benefits, all of which support the club’s ability to effectively communicate their message, including on issues such as DEI and gender ideology.

The UI YAF chapter has actively engaged in expression on these ideas. For example, in February 2024, the chapter hosted Vince Everett Ellison for an event entitled “Diversity Equity and Inclusion: The Real Slavery.” The YAF chapter and plans to continue to conduct activism on these topics.

³ <https://dos.uiowa.edu/policies/registration-student-organizations>



Additionally, forcing students to include this clause constitutes compelled speech because it forces students to profess agreement with ideological premises with which they disagree. This violates both the First Amendment. It also violated Title IX because the compelled speech at issue here recognizes sex-based distinctions that are not permitted by law, and it discriminates against student who hold traditional and biological views on sex by relegating their beliefs to second-class status while elevating pro-gender ideology views. Thus, UI conditions important resources and privileges on civil rights violations.

Request for Investigation and Enforcement.

Trump Administration Directives

President Trump has armed and directed the Office of Civil Rights to investigate and defund schools that violate civil rights laws.

1. Executive Order No. 14151.

President Trump has determined to **End Radical and Wasteful Government DEI Programs and Preferencing**. To accomplish this goal, President Trump has empowered ED to “terminate....all DEI...offices and positions” as well as “all ‘equity action plans,’ ‘equity’ actions, initiatives, or programs, ‘equity-related’ grants of contracts.”

UI accepts federal funds. These funds enable UI to violate civil rights by forcing conservative students to acknowledge tenets of gender ideology as a condition of access to resources that are available to leftist groups. In doing so, UI violates this directive.

2. Executive Order No. 14173.

President Trump has determined to **End Illegal Discrimination and Restore Merit-Based Opportunity**. The Trump Administration has acknowledged that American “institutions of higher education have adopted and actively used dangerous, demeaning, and immoral race- and sex-based preferences under the guise of so-called ‘diversity, equity, and inclusion’ (DEI) or ‘diversity, equity, inclusion, and accessibility’ (DEIA) that can violate the civil rights laws of this Nation.” The administration has further acknowledged that “Illegal DEI and DEIA policies not only violate the text and spirit of our longstanding Federal civil-rights laws, they also undermine our national unity, as they deny, discredit, and undermine the traditional American values of hard work, excellence, and individual achievement in favor of an unlawful, corrosive, and pernicious identity-based spoils system. Hardworking Americans who deserve a shot at the American Dream should not be stigmatized, demeaned, or shut out of opportunities because of their race or sex.” The Trump Administration furthered ordered the Attorney General to “[t]erminate all...‘equitable deployment of financial...assistance.’”



UI's DEI- and gender-based programs violate a basic premise of the college experience: that hard work and equal treatment, not identity-based opportunity or divisive programs, define student success. In doing so, UI violates this directive.

3. **Executive Order No. 14168.**

President Trump has determined to **Defend Women from Gender Ideology Extremism and Restore Biological Truth to the Federal Government**. The Trump Administration has ordered that “Federal funds shall not be used to promote gender ideology. [ED] shall assess grant conditions and grantee preferences and ensure grant funds do not promote gender ideology.”

UI uses outlandish, Orwellian terms such as “gender identity,” and forces students to communicate that message, even when it violates the student’s beliefs, in violation of this directive. Further, because of the free speech concerns implicated by gender ideology, ED should prioritize investigation into and sanctions for this matter.

The Trump Administration has specifically acknowledged the campus left’s barrage on free speech on gender issues by ordering the Attorney General to “ensure the freedom to express the binary nature of sex and the right to single-sex spaces in...federally funded entities covered by the Civil Rights Act of 1964,” and has ordered ED to prioritize investigations and litigation to enforce the rights and freedoms identified.”

4. **Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.**

ED has stated that “[a]ll students are entitled to a school environment free from discrimination.” ED therefore has advised schools to “ensure that their policies and actions comply with existing civil rights law” and “cease all efforts to circumvent prohibitions on the use of race by relying on proxies or other indirect means to accomplish such ends.” ED has stated that DEI programs violate this directive because they “frequently preference certain racial groups and teach students that certain racial groups bear unique moral burdens that others do not. Such programs stigmatize students who belong to particular racial groups based on crude racial stereotypes. Consequently, they deny students the ability to participate fully in the life of a school.”

UI has proven its dedication to DEI and division by obscuring their real DEI-based objectives behind vague wording. In doing so, UI violates this directive.

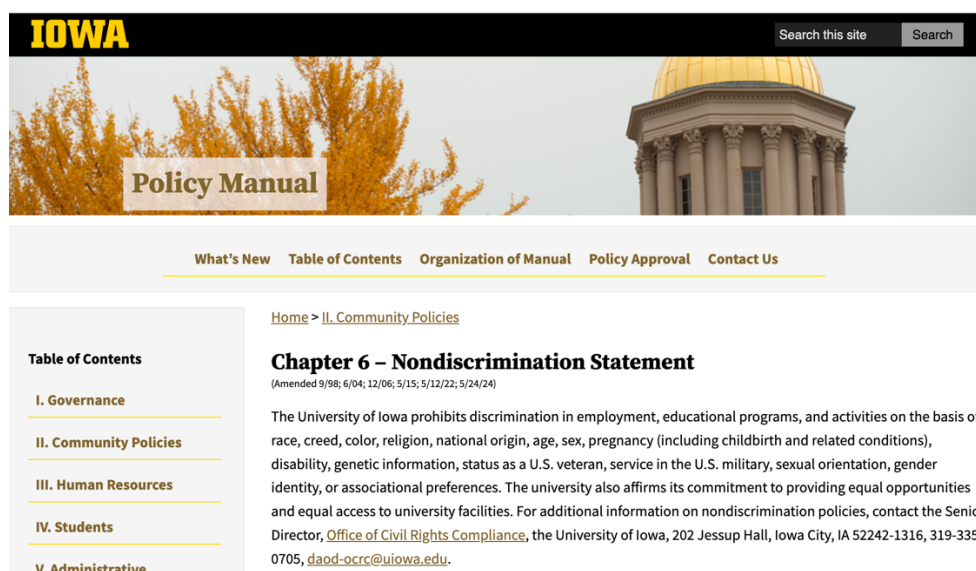
Allegations against the University of Iowa

1. UI forces students to express and agree to a “human rights” clause that recognizes “sexual orientation, gender identity, associational preferences, or any other classification which would deprive the person of consideration as an individual.” In doing so, UI



recognizes sex-based distinctions that are not legitimate under law. This violates Title IX, Executive Order No. 14151, and Executive Order No. 14168.

2. UI's official Policy Manual⁴ includes a Nondiscrimination Statement that affirms "sexual orientation" and "gender identity."



This violates Title IX, Executive Order No. 14151, and Executive Order No. 14168.

3. UI exerts authority to punish students who discriminate against someone based on "sexual orientation, gender identity, or associational preferences."⁵ This violates Title VI, Title IX, Executive Order No. 14151, and Executive Order No. 14168.
4. UI's Policy Manual affirms the school's commitment to affirmative action. This policy is based in the school's "Statement on Diversity":

8.2 Statement on Diversity

The University of Iowa values diversity among students, faculty, and staff, and regards equal employment opportunity and affirmative action as tools to achieve diversity. The university believes that a rich diversity of people and the many points of view they bring serve to enhance the quality of the educational experience at the University of Iowa.

This violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

⁴ <https://opsmanual.uiowa.edu/community-policies>

⁵ <https://opsmanual.uiowa.edu/community-policies/human-rights#3.1>



5. UI's Division of Division of Access, Opportunity, and Diversity is a DEI office.
 - a. UI renamed this division from "Division of Diversity, Equity, and Inclusion" just last year.
 - b. UI's Student Code of Conduct that its "Office for Intuitional Equity" has disciplinary authority over students:

2. Discipline Based on Office of Institutional Equity Findings

As required, the Office of Student Accountability will consult with the Title IX Coordinator to determine and impose appropriate sanctions for any student found responsible for violating the [Sexual Harassment and Sexual Misconduct Policy](#).

The Office of Student Accountability will consult with the Director of Equity Investigations and ADA Coordinator to determine and impose appropriate sanctions for any student found responsible for violating university policies related to bias, harassment, discrimination, equity, or free speech by the Office for Institutional Equity.

This Office for Institutional Equity page⁶ invites users to visit a specified link to "visit the OIE website." That link redirects to the Office of Civil Rights Compliance,⁷ a subsection of the Division of Access, Opportunity, and Diversity. Another official UI page⁸ shows that the Office of Institutional Equity is or was responsible for affirmative action:

UI Office of Institutional Equity

- [Affirmative Action Plan Data](#)

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter. ED should investigate what authority the Office of Institutional Equity holds and how they are wielding that authority.

- c. Personnel seemingly remain the same, just with different titles. For example, "Dr. Liz Tovar's title is now the Executive Officer and Associate Vice President of the Division of Access, Opportunity, and Diversity."⁹

⁶ <https://offcampus.uiowa.edu/guide/the-office-of-institutional-equity>

⁷ <https://diversity.uiowa.edu/daod/ocrc>

⁸ <https://fmb.fo.uiowa.edu/administrative-units/ui-office-equal-opportunity-diversity>

⁹ <https://diversity.uiowa.edu/path-forward-task-force-report#:~:text=Change%20the%20name%20of%20the,to%20all%20eligible%20campus%20constituents.>

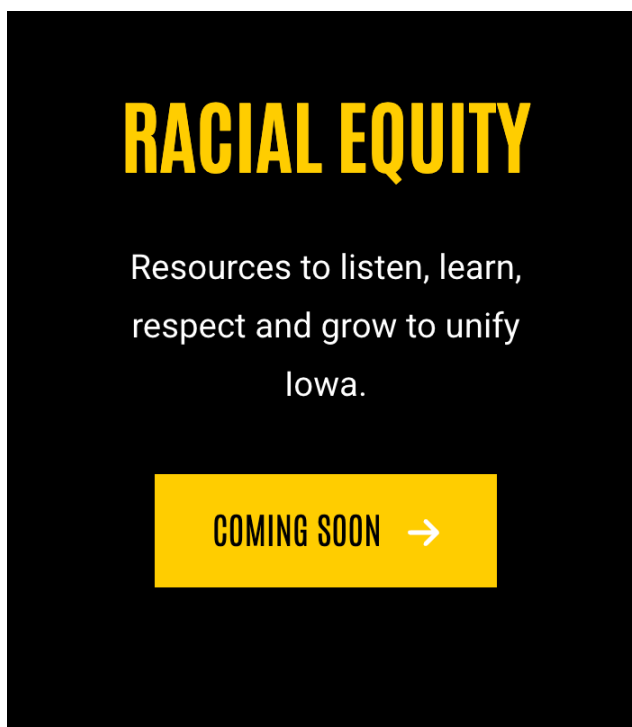


- d. According to Charlie Taylor, communications director of the Division of Diversity, Equity and Inclusion, some name change were expressly intended to further UI's DEI efforts¹⁰:

"She identified a need to more clearly communicate the institutions' DEI efforts," he said. "The new names better convey the specific services of each unit, leading to better understanding and increased engagement with our students, faculty, and staff."

In other words, more DEI, not less.

- e. UI intends to further its racialism and is advertising a new, upcoming resource:



- f. This division promotes the "Pride Alliance Center" which offers "social justice education and change."¹¹ This center honors LGBTQ+ History Month, "a month-long celebration that occurs in **October** to observe lesbian, gay, bisexual, transgender, and queer history. It also honors the ongoing history of queer and trans rights." This division also hosts a "Pride House":

¹⁰ <https://dailyiowan.com/2022/02/07/university-of-iowa-division-of-diversity-equity-and-inclusion-changes-the-name-of-two-popular-centers/>

¹¹ <https://multicultural.uiowa.edu/culturalcenters/pridehouse>



The Pride House offers a supportive environment where students interact with others and experience diversity while serving their community. In Spring 2005, The Executive Board of the UI Gay, Lesbian, Transgender & Allied Union (GLBTAU) met with University administration to discuss the possibility of securing a Center for the LGBTQ community. The Pride House (then named Lesbian Gay Bisexual Transgender Resource Center) opened its doors in Fall 2006 as a space to interact with other LGBTQ students and enhance student educational experience at the University of Iowa.

and a “QT Closet”¹²:

Our mission is to provide gender-affirming clothing that is both free and sustainable to the University of Iowa and Iowa City communities. While we seek to center to queer and trans folx, and provide a safe space to explore one's gender expression, we know that access to clothing can be a barrier for anyone. Thus, we welcome those of all identities to utilize our service.



- g. This division also promotes a Robert D. Dockendorf Scholarship that is available only to Pride Center affiliates.¹³

This violates Title VI, Title IX, Executive Order No. 14151, Executive Order No. 14173, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.

Based on the above, YAF urges the OCR to open a formal investigation into the University of Iowa and to apply appropriate remedial actions. To the extent that any of this information falls outside the OCR’s subject-matter jurisdiction, we request that you refer that portion of the complaint to the Attorney General for further action.

¹² <https://multicultural.uiowa.edu/culturalcenters/pridehouse/qt-closet>

¹³ <https://multicultural.uiowa.edu/robert-d-dockendorff-scholarship>



Conclusion.

YAF looks forward to seeing American colleges truly become the “marketplace of ideas,” where speech is free in both policy and fact, and the only identity that matters is each student’s dignity as a human being. Please contact me if I can provide further assistance or information.

Sincerely,

A handwritten signature in black ink, appearing to read "MH", with a long horizontal flourish extending to the right.

Madison Hahn
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CC:
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