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March 3, 2025

VIA EMAIL

Atlanta Office
Office for Civil Rights
U.S. Department of Education
61 Forsyth St. S.W., Suite 19T10
Atlanta, GA 30303-8927
OCR.Atlanta@ed.gov

Re: Civil Rights Complaint Against the University of Tennessee, Knoxville 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 Tennessee, Knoxville.

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

¹ <https://yaf.org/detrans/>

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



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 racialist and gender ideology and to rid schools of DEI bullies who set out to harm the very students they are supposed to be serving.

University of Tennessee, Knoxville

On behalf of our YAF members at the University of Tennessee, Knoxville (UTK) and all truth-seeking students on that campus, YAF requests that you open a formal investigation into UTK for its promotion of DEI, racialism, 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:

UTK institutionally prioritizes DEI and gender ideology. UTK boasts a Campus Climate Impact Committee which deals with "bias incidents" and "climate concerns."³ A campus climate concern includes "Conscious exclusion," "hate messages," or "racial, ethnic, or other slur in a joke to refer to or identify someone."⁴ UTK encourages anyone who has "who has experienced **or witnessed** a campus climate concern" (emphasis added) to report it to the CCIC. The ICC's presentation request form includes an entry for chosen pronouns.⁵ Non-disciplinary bodies like the CCIC are a common leftist tool. Career-DEI administrators are permitted to bully and intimidate students who disagree with DEI and gender ideology dogma. Conservative students are "invited" to reeducation meetings under express or implied threat. True to form, "Members of CCIC develop plans to initiate restorative practices and educational conversations with students."

UTK's "Policy on Sexual Harassment, Sexual Assault, Dating and Domestic Violence, and Stalking" protects "sexual orientation, gender identity, [and] **gender expression**" (emphasis added) and contains Orwellian statements such as "relationship status and can occur between

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).

³ <https://studentlife.utk.edu/campusclimate/report-an-incident/>

⁴ <https://studentlife.utk.edu/campusclimate/campus-climate-concerns/>

⁵ <https://studentlife.utk.edu/campusclimate/request-a-presentation/>



people of the same or of different sexes, sexual orientations, gender identities, or gender expressions.”⁶ This policy is in blatant violation of a federal court order.⁷

UTK’s office of Mattering and Belonging is a guise for DEI. Mattering and Belonging promotes “Multicultural Student Life,” a division dedicated to “advocating for traditionally marginalized students.”⁸ This division “promotes diversity and inclusion to empower all university students in order to impact societal equity throughout the state of Tennessee and across the world.” This division offers two scholarships, one of which UTK expressly makes available to all students. UTK does not, however, state clear criteria for the “Dr. Jane S. Redmond Scholarship”⁹; ED should therefore investigate whether this scholarship has racial criteria in violation of Title VI.

Mattering and Belonging also promotes the “Pride Center.” In UTK’s own words (emphasis added):

*The mission of the Pride Center is to provide academic and social support for the LGBTQ+ community at the University of Tennessee, Knoxville (UT). We strive to be a space for all members of the UT community to engage with and explore issues relating to gender and sexuality. **Our mission is accomplished through our educational programming focusing on gender identity, gender expression, and sexual orientation; our contributions to and maintenance of a campus LGBTQ+ community; and advocating for equitable access for LGBTQ+ students, faculty, and staff on campus.***

UTK’s Pride Center violates Title IX because it offers resources and advocacy that are not available to students who hold traditional and biological views on sex.

UTK forces students to go along with their radical ideology. To become a recognized student organization, UTK mandates that “[t]he following statement must appear verbatim in organization constitutions: “Membership is open to all students, regardless of race, color, national origin, religion, sex, pregnancy, marital status, **sexual orientation, gender identity**, age, physical or mental disability, or covered veteran status.” (emphasis added) The UTK YAF

⁶ <https://titleix.utk.edu/wp-content/uploads/sites/96/2024/08/Title-IX-Policy-2024-25.pdf>

⁷ In *Kansas v. Dept. of Educ.*, Kan. Dist. Ct., No. 5:24-cv-04041, Young America’s Foundation obtained the first nation-spanning injunction against the Biden-Harris administration’s wrongheaded rewrite of Title IX. That injunction enjoined Kansas State from “taking any action to enforce the Final Rule promulgated by the Department of Education titled ‘Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance.’” (Preliminary injunction entered Jul 2, 2024)

⁸ <https://studentlife.utk.edu/multicultural/about/mission-vision-and-values/>

⁹ <https://studentlife.utk.edu/multicultural/scholarships/dr-jane-s-redmond-scholarship/>



chapter submitted their club constitution with this clause but noted their objection to it. The chapter continues to be forced to operate under this constitution to maintain recognition.

Without recognition, student organizations lose access to important benefits, including access to club funding,¹⁰ which affects a club's ability to effectively communicate their message, including on issues such as DEI and gender ideology.

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, UTK conditions important resources and privileges on civil rights violations.

Request for Investigation and Enforcement

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

Trump Administration Directives

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.”

UTK accepts federal funds. These funds enable UTK to violate civil rights by forcing conservative students to acknowledge and even repeat tenets of gender ideology as a condition of access to resources that are available to leftists. In doing so, UTK 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,

¹⁰ <https://go.utk.edu/funding-your-organization/>



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 further ordered the Attorney General to “[t]erminate all...‘equitable deployment of financial...assistance.’”

UTK’s DEI-, race-, 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, UTK 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.”

UTK uses outlandish, Orwellian terms such as “gender expression,” 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 these 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.”

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

Allegations against UTK

1. UTK forces students to agree with and promote gender ideology as a condition of access to club recognition and benefits. UTK also forces conservative students who want to gather with friends who believe in traditional, biological sex to associate with students who believe in harmful and extreme gender ideology as a condition of access to club recognition and benefits. This violates Title IX, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.
2. UTK funds “sex week.” Sex Week is organized by a student club, not by UTK. Sex Week is nominally about sexual health, but is really about sexual deviance, including gender ideology. In the words of UTK’s Sex Week leader, its mission includes “topics like gender identity, sexuality as a spectrum, BDSM and kink subjects that many people may never have a safe place to explore anywhere else.”¹¹ Sex Week 2024 started off with a “series about gender, queer sex safety and navigating transness” and concluded with an “iconic annual drag show.”¹²

YAF supports free speech. Student clubs have the right to express their ideas within the bounds of the law, even if those ideas are terrible. However, Sex Week is partially funded by university departments through gift funds.¹³ “Gift funds are allocated by the senior leader of each department ... [sex week] has received unrestricted gift funds (i.e., donations made to the university without a specific purpose indicated by the donor).” These funds differ from the regular student club benefits available to all registered student organizations. For example, UTK departments have supported Sex Week as shown in this chart¹⁴:

¹¹ https://www.utdailybeacon.com/opinion/columns/opinion-we-re-so-back-a-re-introduction-to-seat-and-sex-week/article_71c91d18-7c22-11ef-ba0b-2bc5e0ef8844.html#:~:text=We%20aim%20to%20give%20students,unapologetic%20academic%20and%20social%20necessity.

¹² https://www.utdailybeacon.com/campus_news/campus_life/sex-week-prevails-with-events-education-empowerment/article_be32dff6-fb56-11ee-a91c-336381eab841.html

¹³ https://comptroller.tn.gov/content/dam/cot/orea/advanced-search/2019/SexWeek_ExecutiveSummaryFNL.pdf

¹⁴ https://comptroller.tn.gov/content/dam/cot/orea/advanced-search/2019/SexWeek_FullReport.pdf



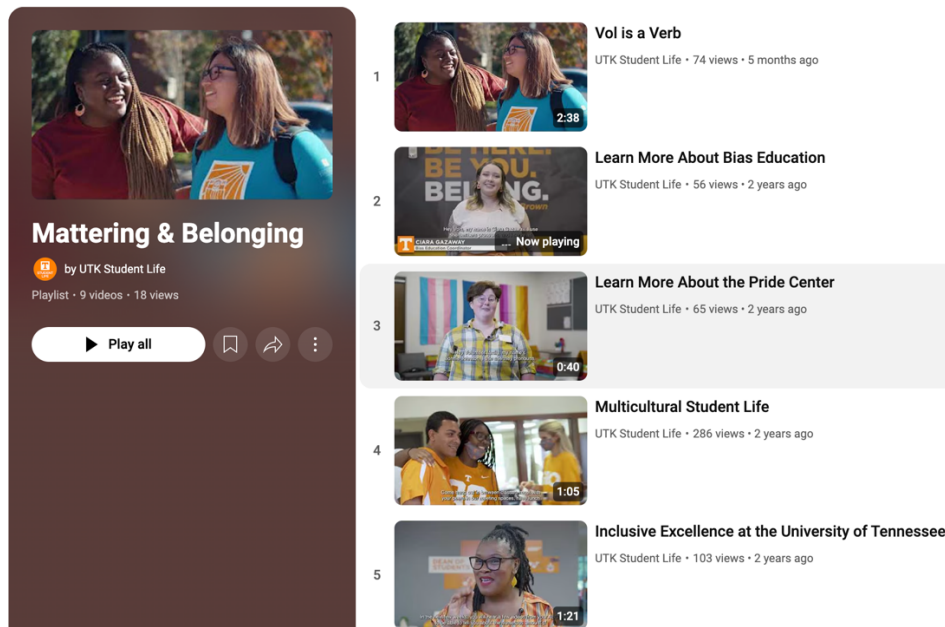
Academic year	Source	Amount	Supported programs
2012-13	n/a	n/a	n/a
2013-14	Ready for the World Fund	\$2,603	General support of Sex Week
2014-15	Arts and Sciences College Fund	\$5,000	Sex Week events: Batteries Not Included: Sex Toys and Pleasure; Getting Wordy and Talking Dirty; We've Got Chemistry: The Science of Orgasm; Enabling Pleasure: Disability and Sex
	Modern Foreign Languages Enrichment Fund	\$360	General support of Sex Week
	UTK Fund – Provost	\$200	Sex Week events: Your Hair Down There; Can't Measure Up: A Body Image Workshop
	Psychology Alumni Support Fund	\$140	Sex Week events: We Can Work It Out: Relationship Workshop; Gay, Straight, or Lying: Biphobia and Bi-Erasure

Thus, UTK is directly funding Sex Week. This violates Title IX and Executive Order No. 14168.

3. UTK uses self-designated “pronouns.” This violates Title VI, Title IX, Executive Order No. 14168, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.
4. UTK empowers its Climate Concerns Impact Committee to reeducate, under express or implied threat or authority, traditional students on “bias” and “inclusivity” concerns. UTK’s delegation of authority to the CCIC 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.
5. UTK empowers the CCIC to “initiate restorative practices and educational conversations with students” who have made a joke that relates to race. This policy is inherently race- and ethnicity-based because it dictates that only people of the “correct” race or ethnicity can speak about that race/ethnicity or the attendant culture. For example, only Mexican people can speak about Mexican culture or only white people can speak about Dutch culture. Thus, in doing so, UTK discriminates against students based on race/ethnicity. UTK’s CCIC violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.
6. UTK’s “Policy on Sexual Harassment, Sexual Assault, Dating and Domestic Violence, and Stalking” protects “sexual orientation, gender identity, [and] gender expression.” This violates Title IX, Executive Order No. 14151, and Executive Order No. 14168.



7. UTK’s Multicultural Student Life offers resources for students from “marginalized” groups with the goal of attaining “equity.” Resources include at least one scholarship that appears to have racial criteria. This violates Title VI, Executive Order No. 14151, Executive Order No. 14173, and the Dept. of Ed. Feb. 14, 2025 Dear Colleague Letter.
8. UTK’s Pride Center offers programming on “gender identity” and specifically offers its resources to members of the “LGBTQ+ community.” The Pride Center is exclusively focused on impermissible DEI- and gender ideology-based objectives and excludes people who are not of an “approved” sexual persuasion. This violates 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.
9. UTK’s Mattering and Belonging division is really a DEI department. The YouTube page of UTK’s Division of Student Life hosts many troubling videos. Take, for example, this one entitled “Learn More About Bias Education.”¹⁵ This video is part of UTK’s “Mattering and Belonging” playlist.



In the video, an administrator announces her “pronouns” and encourages students to become “more inclusive.”

¹⁵ https://www.youtube.com/watch?v=XOmG_Di5xxo&list=PLrOncPnWo9ALxhtOmv-3pJ17x77_m4f_V&index=2



The administrator directs students to “bias.utk.edu” for more information. When a user types in that address, the page redirects to the Orwellian “campus climate” page. When this video was made, Ms. Gazaway was the “bias education coordinator.” Ms. Gazaway is now a “program director for the Office of the Dean of Students” and “chairs the Campus Climate Impact Committee.”¹⁶ This proves that UTK has stripped some of its DEI and gender ideology language from its official website, renamed various departments, and retitled various administrators without changing any of its underlying goals. UTK is still pushing DEI. In doing so, UTK 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 you to open a formal investigation into the University of Tennessee, Knoxville 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.

¹⁶ <https://studentlife.utk.edu/dos/ciara-gazaway/>



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.

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