

**From:** (b)(6); (b)(7)(A);  
**To:** (b)(6); (b)(7)(A); (b)(7)(C) OCR San Francisco; (b)(6); (b)(7)(A); (b)(7)(C)  
(b)(6); (b)(7)(A); (b)(7)(C)  
**Subject:** Re: Violation of Title VI and IX: Addressing Antisemitism at USC Gould School of Law: A Call for Moral and Legal Action  
**Date:** Tuesday, April 30, 2024 5:36:08 PM  
**Attachments:** 65C25C5F46434507B43C188C4C96A2B4.jpeg  
18964ec4-46fd-4d63-9541-e1556d08f8a8.heic  
IMG\_6858.heic  
IMG\_6857.heic

You don't often get email from (b)(6); (b)(7)(A); (b)(7)(C) [Learn why this is important](#)

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

I am writing to you today not just as an alumnus, but as a deeply concerned citizen, compelled to voice my disgust and profound disappointment in how this esteemed institution has mishandled, and continues to mishandle, the safety and dignity of its Jewish students.

Just when I thought my connection to USC could not be more tarnished, further disgrace comes to light. It has come to my attention, and undoubtedly yours, the disturbing instance where a swastika—a universal symbol of hate—was found on campus. This abhorrent act, coupled with the ongoing harassment of Jewish students, signals a profound moral crisis within our campus. It is not merely about isolated incidents but a pervasive atmosphere of intimidation and fear that we can no longer afford to ignore.

In (b)(6); I alerted your office to the growing concern among Jewish students about their safety and well-being on campus. Sadly, my warnings have proven prescient.

Attached is just ONE message (identifiable information redacted) from Jewish students who now fear for their safety in ways that are chillingly reminiscent of darker times. Consider the text I received from a Jewish student, a clear testament to the climate of fear that now permeates USC: "I've always felt safe wearing a kippa at USC, but today, I felt threatened and vulnerable merely walking through campus."—a sentiment echoed by others and largely ignored by those tasked with ensuring their security. This is not the environment that any student should navigate—where wearing a kippa becomes a trigger for fear, and family members feel compelled to advise concealment rather than pride in one's identity.

The response from the Department of Public Safety—to offer escorts—while well-intentioned, is merely a Band-Aid over a gaping wound. It does not address the root cause of the problem: a toxic environment where Jewish students are openly harassed by peers and, shockingly, by professors and staff. The administration's passive stance on this harassment is akin to tacit approval.

This situation is not just a failure of university policy but, potentially, a legal liability. The precedent set by "United States v. Price," better known as the Mississippi Burning case, highlights the application of the Anti-Klan Act of 1871 in circumstances similar to those currently unfolding at USC. The law clearly states that there is liability not only for perpetrators but also for those who, knowing a conspiracy against rights exists, fail to prevent it. Your administration is on notice yet CONTINUALLY chooses inaction.

The continued harassment of Jewish students by the Students for Justice in Palestine (SJP) and allied groups under your watch might well meet the criteria for a violation of Section 1985(3), which prohibits conspiracies to deprive individuals of their constitutional rights.

The time for platitudes and temporary solutions is over. USC must take decisive, transparent steps to dismantle this pervasive culture of intimidation and discrimination. The university's legacy and moral standing are at stake,

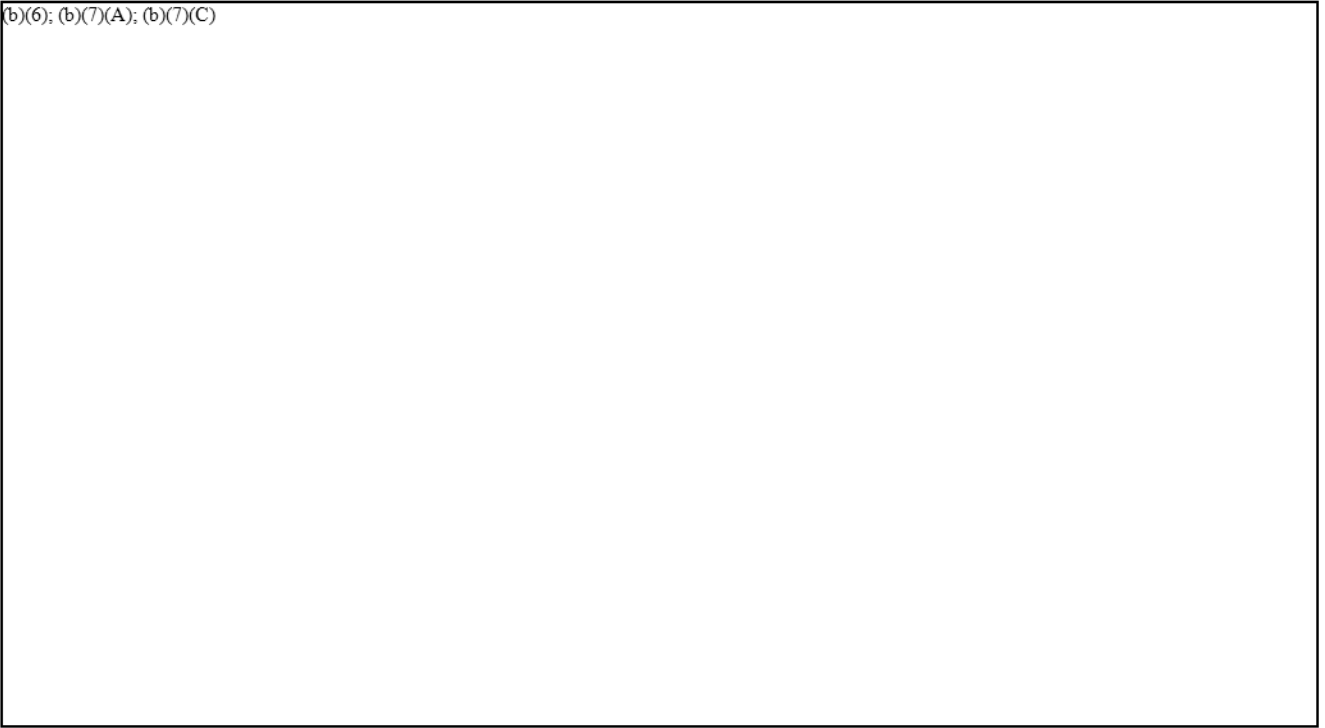
as is the safety of its student body. Will you act only when lawsuits compel you, or will you lead with moral courage now?

This letter is not just a critique but a demand for immediate, transparent measures to rectify this failing in our community. As Trojans, we are called to fight on, but we must also fight right—standing up against injustice and ensuring a safe, inclusive environment for all students.

Expecting your prompt response and action.

All the best,

(b)(6); (b)(7)(A); (b)(7)(C)



 Please consider the environment before printing this email

On Nov 17, 2023 at 12:31 PM -0800, (b)(6); (b)(7)(A); (b)(7)(C) wrote:

Sent with a heavy heart and deep sense of sadness for the institution I once loved.

All the best,

(b)(6); (b)(7)(A); (b)(7)(C)



(b)(6); (b)(7)(A); (b)(7)(C)



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

REGION IX  
CALIFORNIA

50 UNITED NATIONS PLAZA  
MAIL BOX 1200, ROOM 1545  
SAN FRANCISCO, CA 94102

June 11, 2024

Dr. Carol Folt  
President  
University of Southern California  
Bovard Administration Building  
Los Angeles, CA 90089-0012

By email only to [president@usc.edu](mailto:president@usc.edu)

Re: University of Southern California – OCR Case Number 09-24-2346

**Response required by: July 12, 2024**

Dear President Folt:

On April 30, 2024, the U.S. Department of Education (the Department), Office for Civil Rights (OCR), received a complaint against the University of Southern California Gould School of Law (the Law School). The complaint alleged, among other things, that since Fall 2023, Jewish students have been harassed on campus by student groups that support Palestine and by Law School employees; Jewish students feel unsafe walking through campus; and swastika graffiti was discovered on campus. The complaint further alleged that the Law School has failed to adequately respond to this harassment and these safety concerns.

OCR enforces Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulations, 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin under any program or activity receiving federal financial assistance. As a recipient of federal financial assistance from the Department, the Law School is subject to Title VI.

OCR will investigate the following issue: whether the Law School responded in a manner consistent with the requirements of Title VI to incidents of alleged harassment of students based on their national origin (shared Jewish ancestry) by other Law School students, student groups, and employees.

Please note that OCR's decision to investigate this issue in no way implies that OCR has made a determination with regard to its merits. During the investigation, OCR is a neutral fact-finder,

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

collecting and analyzing relevant evidence from the complainant, the recipient, and other sources, as appropriate. OCR will ensure that its investigation is legally sufficient as required by OCR's Case Processing Manual (CPM), (July 18, 2022). Please open this link for information about OCR's Complaint Processing Procedures. OCR also would like to make you aware that individuals who file complaints with OCR may have the right to file a private suit in federal court whether or not OCR finds a violation.

OCR may close this complaint prior to making formal findings of compliance or non-compliance, provided that the circumstances or information gathered establishes an administrative or other basis for resolution in accordance with the CPM. For example, under Section 201(b) of OCR's CPM, if both parties are interested and OCR determines that the individual allegations are appropriate for mediation, the parties may voluntarily resolve these complaint allegations through mediation that OCR will facilitate. Note that in such a case OCR does not monitor or enforce the agreement reached between the parties.

To reach an efficient and timely resolution of this matter, OCR is providing you an opportunity to present your response to these allegations and to submit supporting documentation. Please provide the information described in the attached data request by the date indicated **at the top of this letter**. OCR has determined that the information itemized in the attached data request is necessary to investigate the issue. The regulations implementing Title VI, at 34 C.F.R. §§ 100.6(b) and (c), require that a recipient of federal financial assistance make available to OCR information that may be pertinent to reaching a compliance determination. Pursuant to 34 C.F.R. § 100.6(c) and 34 C.F.R. § 99.31(a)(3)(iii), of the regulations implementing the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, OCR may review personally identifiable records without regard to considerations of privacy or confidentiality. OCR will take all proper precautions to protect the identity of any individuals named in the documents.

On receipt of this letter notifying the Law School that OCR has opened an investigation of the above-referenced allegation, **please contact OCR San Francisco at Michelle.Ternus@ed.gov and Alexis.Turzan@ed.gov** with the name, title, email, and telephone number of the person you designate to be OCR's primary point of contact for the investigation of this complaint.

Please be advised that the Law School must not harass, coerce, intimidate, discriminate, or otherwise retaliate against any individual because that individual asserts a right or privilege under a law enforced by OCR or files a complaint, testifies, assists, or participates in a proceeding under a law enforced by OCR. If this happens, the individual may file a separate retaliation complaint with OCR.

Under the Freedom of Information Act (FOIA), it may be necessary to release this document and related correspondence and records upon request. If OCR receives such a request, OCR will seek to protect, to the extent provided by law, personally identifiable information that could reasonably be expected to constitute an unwarranted invasion of personal privacy if released.

Your cooperation is appreciated. If you have any questions, please contact our office at 415-486-5555 or Michelle.Ternus@ed.gov and Alexis.Turzan@ed.gov.

Sincerely,

(b)(6); (b)(7)(A);  
(b)(7)(C)

FOR Yohance Edwards  
Team Leader

Enclosures

U.S. Department of Education - Office for Civil Rights, San Francisco  
Initial Data Request  
University of Southern California (the University)  
OCR Docket Number 09-24-2346

OCR requests that this information reach our office by July 12, 2024. If any of the required items are available to the public on the Internet, you may provide the website address. While OCR prefers electronic submissions, you may send documents by any of the following means:

**SharePoint:** OCR may create an external sharing site through a browser-based portal in which the requested documents and information may be uploaded. Please contact [Alexis.Turzan@ed.gov](mailto:Alexis.Turzan@ed.gov) and [Michelle.Ternus@ed.gov](mailto:Michelle.Ternus@ed.gov) to receive online portal information to upload data.

**Email:** [Alexis.Turzan@ed.gov](mailto:Alexis.Turzan@ed.gov) and [Michelle.Ternus@ed.gov](mailto:Michelle.Ternus@ed.gov).

**Fax:** (415) 486-5570

**Mail:** U.S. Department of Education, Office for Civil Rights  
50 United Nations Plaza  
Mail Box 1200; Room 1545  
San Francisco, CA 94102

Please do **not** provide the information via an electronic cloud format such as Google Docs. Please also do not include student social security numbers with any submission. Because email is not reliably secure, please do not email any document that contains personally identifiable or private information without first encrypting this information. You may upload this information using the SharePoint option described above.

For purposes of this data request and all subsequent data requests, “document” means a piece of written, printed, photographic, electronic, videotaped, audiotaped, or other matter. Please note that this data request is of an ongoing nature, such that if documents relevant to this request are discovered or become available at a later time, we request that the recipient promptly provide such documents to OCR. OCR also requests that you provide any and all documents that are relevant to OCR’s review of this matter, regardless of whether OCR has specifically requested such documents.

**Preservation of requested and relevant data and documents:** To ensure that OCR can assess the recipient’s compliance with the statutory and regulatory obligations at issue in this investigation, please ensure that recipient employees preserve the data and documents requested below for the timeframe specified in these requests and going forward until OCR closes this complaint. Please also ensure that recipient employees preserve other data and documents that are relevant to the allegation(s) under investigation until OCR closes this complaint. The regulation implementing Title VI, at 34 C.F.R. §§ 100.6(b) and (c), requires that a recipient of federal financial assistance make available to OCR information that may be pertinent to reaching a compliance determination.

Please provide the following information for the 2023-2024 academic year and to the present, unless otherwise indicated, or indicate in writing if any of the requested items do not exist.

1. A narrative response to the issue OCR is investigating and a copy of any documents or data relied upon in the narrative or supporting the facts stated in the narrative.
2. State whether the allegations have been or are currently under investigation by the University or with another agency or court. If so, please provide the status of any investigation, any related complaint, and any determinations made by the University, the agency, or the court, including interim determinations.
3. A copy of or link to the University's policies and procedures applicable to the Gould School of Law (the Law School), and a description of its practices, governing the investigation of and response to reports and complaints of discrimination, including harassment, against students, faculty, and staff on the basis of national origin (including shared ancestry). Please also provide the name(s), job title(s), and contact information of the University's employees responsible for handling such reports and complaints at the University at each level of the process.
4. An explanation of the means by which the University and/or the Law School informs students, faculty, and staff of the policies and procedures referred to in Item 3. Please provide copies of all materials disseminated to students, faculty, and staff or provide links to the webpages where these materials are posted.
5. Copies of the University's policies and procedures applicable to the Law School, and a description of the University's practices, governing: (a) disciplinary or corrective actions that may be taken to address harassment of and other discrimination against students on the basis of national origin, including shared ancestry; and (b) the provision of supports and remedies to students, employees, and other individuals found to have been discriminated against/harassed on the basis of national origin, including shared ancestry.
6. A detailed description of all formal and informal complaints and reports of discrimination, including harassment, based on national origin (shared ancestry) of students at the Law School. Please include:
  - a. copies of any complaint(s) or reports received;
  - b. the name(s) and job title(s) of the person(s) to whom the complaint was made or who otherwise became aware of the alleged incident;
  - c. the name and relation to the University of the person making the report/complaint (e.g., student, faculty members, parent/guardian, counsel, member of the public);
  - d. the date of each complaint(s) or report received;
  - e. a detailed description of each complaint/report, including the name(s) of the alleged target(s) of discrimination/harassment and the alleged discriminators/harassers if not evident from the copy of the complaint/report;
  - f. a detailed description of the procedures employed to resolve the complaint or report;
  - g. the length of the process to resolve the complaint or report (e.g., 62 days);

- h. the name(s) of any students involved in the alleged incident and their national origin (including shared ancestry) if known;
  - i. the name(s) and job title(s) of the person(s) responsible for investigating and otherwise resolving the complaint or report;
  - j. the name(s) and relationship to the University of any witnesses interviewed by the University;
  - k. all actions taken by the University in response to the allegations raised by the complaint or report, including any individual and or University-wide corrective actions, and the date(s) of such action(s);
  - l. the University's final determination, if any, regarding each complaint and report and the date of the determination;
  - m. any notice of the final outcome of the investigation or resolution provided to the reporting party or others with regard to the complaint or report; and
  - n. if the University did not investigate any particular report/complaint, the reason(s) for not investigating, and the name(s) and job title(s) of the person(s) who made the decision; and
  - o. copies of any other documentation related to each complaint or report. including but not limited to, interview or other notes, emails, investigative reports, internal and external memoranda, witness statements, meeting minutes, correspondence, logs, forms, record of supportive measures and/or remedies offered and provided, and hearing transcripts generated by the University offices.
7. State whether the University and/or the Law School conducts focus groups, other meetings, or trainings and/or holds informational sessions with students and/or staff regarding students' rights under Title VI, how to report possible violations of Title VI, and/or the University's obligation to respond to Title VI complaints. If so, provide the dates of such events, a description of the attendees, and any materials presented and/or distributed.
  8. A detailed description of any training regarding discrimination, including harassment, based on national origin (shared Jewish ancestry) provided to University staff responsible for responding to complaints based on shared Jewish ancestry and/or Israeli. For each such training provide the dates of such training, a description of the training, a description of the training participants, and copies of any materials distributed during the training.
  9. The name, job title, address, telephone number, fax number, and email address of the University's contact person for this complaint.
  10. Any other information the University believes will assist OCR in its investigation.