

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,

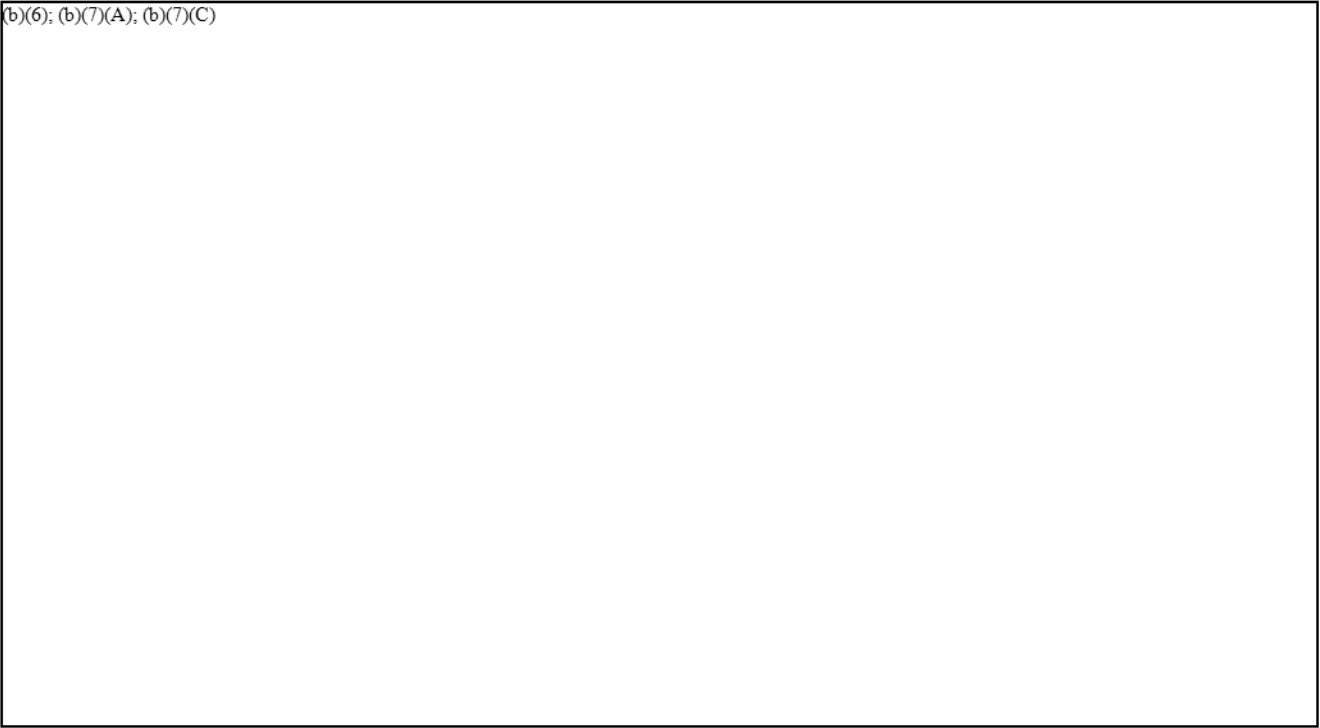
as is the safety of its student body. Will you act only when lawsuits compel you, or will you lead with moral courage now?

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

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

