



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS
ADMINISTRATIVE COMPLAINT

February 7, 2024

United States Department of Education
Office for Civil Rights
Lyndon Baines Johnson Department of Education Building
400 Maryland Avenue, SW
Washington, DC 20202-1100
Via Email: OCR@ed.gov

To Whom It May Concern:

This is a federal civil rights complaint pursuant to the U.S. Department of Education's (Department) Office for Civil Rights' (OCR) discrimination complaint resolution procedures.

Parents Defending Education (PDE) brings this complaint against Illinois Mathematics and Science Academy in Aurora, Illinois for discrimination on the basis of race in programs or activities that receive federal financial assistance in violation of both Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. § 2000d *et seq.*, and the Equal Protection Clause of the 14th Amendment to the U.S. Constitution.

PDE makes this complaint as an interested third-party organization with members who are parents of school children throughout the country. PDE and its members oppose discrimination on the basis of race and political indoctrination in America's schools. Illinois Mathematics and Science Academy is offering affinity group programming to some that is not offered to all. Admittance into the Brotherhood Sister Circle affinity group is solely based on individual's race and sex. Specifically, the group is open only to "Black" and "Latinx" individuals and certain events are further divided based on the individual's sex.

Attached to this complaint is supporting evidence in the form of a webpage for the Brotherhood Sister Circle affinity group (Exhibit A), email conversations about an upcoming BHSC retreat, wherein only certain races were invited to participate (Exhibit B), flyers for the BHSC retreat (Exhibit C), and the agenda for the BHSC retreat (Exhibit D).

Emails obtained by an open records request indicate only "emails for the Black and Latinx students" receive invitations to attend the BHSC retreat. Therefore, only certain students were invited to attend, and this was solely based on the individual's race.

Likewise, other emails received from an open records request between the yearbook committee and the Coordinator of Diversity Equity and Inclusion emphasize all attendees at the retreat must be "Black" or "Latinx," even photographers from the yearbook. The yearbook committee representative asks if "our photographers need to be Black or Latinx" (Ex. B at 4).

The coordinator later explains photographers who aren't "Black" or "Latinx" are only allowed to participate during a previously agreed upon time frame because the retreat is "closed" to individuals who are not Black



or Latinx (Ex. B at 3). Specifically, the Coordinator of Diversity Equity and Inclusion says, “I would ask for Black/Latinx photographers so that pictures can be taken throughout the day” (Ex. B at 3).

Furthermore, flyers for the event specifically targets “Black” and “Latinx” individuals to register (Ex. C at 2). The flyer exclaims, “CALLING ALL IMSA BLACK AND LATINX” above the button to register for the event (Ex. C at 2). The second flyer states “event for Black and Latinx students” (Ex. C at 3).

A goal of this retreat is to provide “additional academic resources,” as well as “networking and mentorship” (Ex. C at 2). These benefits are accessible to some students and exclude others, solely on the basis of skin color.

An agenda for the BHSC event is broken out into sections that target certain groups of students based on the color of their skin. One breakout session is for “men of color” and another session is for “women of color” (Ex. D at 2-3). A later panel covers “Black and Latinx Emotional Social Well-being in a Radicalized Society” (Ex. D at 3). By intentionally separating students based on the basis of skin color and gender for educational programming, this unlawful practice perpetuates and condones discrimination in one of the state’s leading STEM institutions. This will have a long-term impact on the institution, as well as the individuals who inhabit it.

Moreover, another document explains a purpose of the Brotherhood Sister Circle affinity group as a “proactive, intentional, and ongoing approach to foster and nurture a safe, affirming and responsive environment and organizational culture where Culturally, Linguistically, and Economically Diverse students feel that they have value” (Ex. A). Students are encouraged to “share their lived experiences, learn about the current system of oppression in America, develop relational leadership skills/stereotype management to confront related issues, engage in mindfulness and positive self-identity activities” (Ex. A). In addition, students in this affinity group have “access to educational resources such as tutors and mentors” (Ex. A). Given the exhibits, these additional benefits appear to be granted solely based on race (and at times sex).

As the Department of Education is no doubt aware, discrimination on the basis of race raises concerns that the Illinois Mathematics and Science Academy has received federal funds in violation of Title VI of the Civil Rights Act of 1964, which declares that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

In addition, Section 1 of the 14th Amendment to the U.S. Constitution asserts: “No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.” On these grounds, the Supreme Court held in 1954 that racial segregation of students is unconstitutional. *Brown v. Board of Education of Topeka*, 347 U.S. 483 (1954).

Recently, the Supreme Court reaffirmed that “racial discrimination is invidious in all contexts.” *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 600 U.S. 181, 214 (2023) (cleaned up). “Distinctions between citizens solely because of their ancestry are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.” *Id.* at 208. Simply put, “[e]liminating racial discrimination means eliminating all of it.” *Id.* at 206.



Thank you for your prompt assistance with this request for investigation and resolution.
Please contact me for further information.

Sincerely,

A handwritten signature in black ink that reads "Caroline Moore". The signature is written in a cursive style with a large initial "C" and "M".

Caroline Moore
Vice President
Parents Defending Education

Enc. Exhibits A-D



EXHIBIT A

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Student Diversity, Equity, and Inclusion Education

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BROTHERHOOD SISTER CIRCLE (BHSC)

The BHSC Experience is a proactive, intentional and ongoing approach to foster and nurture a safe, offering and responsive environment and organizational culture where Culturally, Linguistically, and Economically Diverse (CLEDE) students feel they have value, the opportunity to contribute their best work and the ability to realize their full potential. The BHSC Experience allows students an opportunity to share their lived experiences, learn about the history and current system of oppression in America, develop relational leadership skills/stereotype management to confront related issues, engage in mindfulness and positive self-identity activities to develop confidence, grit and resilience, as well as have access to educational resources such as tutors and mentors.


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BHSC Retreat: The World Within Reach

The Black and Latinx faculty/staff at MSA meet to discuss strategies to provide additional support for Black and Latinx students. This year, the group is hosting a retreat for students on Sunday April 2nd, 2023. As a strategy of the MSA Board of Trustees approved Equity and Excellence Policy <https://go.boarddocs.com/11/msa/Board.nsf/goto?open&id=XXVKKP8F83>, the goal of ... [Read More](#)



Speaking Your Truth Through Spoken Word

AKA Marcus Sibley. He is a speaker poet, hip hop artist, activist and entrepreneur. He serves as the Communications, Press & Publicity Chair for the New Jersey State Conference NAACP and the Environmental & Climate Justice Chair for the Southern Burlington County NJ NAACP.



BHSC, BSU, Alma Latina Host: COVID-19 Courageous Conversation

Emerging data shows that African Americans and Latinx communities are being



EXHIBIT B

All tools Edit Convert E-Sign Find text or tools Share

Fwd: BHSC Retreat March 12, 2022

Subject: Fwd: BHSC Retreat March 12, 2022
From: [REDACTED]@imsa.edu>
Date: 3/3/22, 10:47 AM
To: [REDACTED]@imsa.edu>

Hi [REDACTED],
Did you request a list of emails for the Black and Latinx students? If not, please request that from OIR, and have [REDACTED] send a letter to parents as well. Thanks [REDACTED]

[REDACTED]
Director of Equity and Inclusion
Personal Gender Pronouns: She, Her, Hers
[REDACTED]
https://works.bepress.com/adrienne_coleman/
Have you experienced racism, microaggressions or bias at IMSA? Report it here: <https://bit.ly/2BS2DAP>

----- Forwarded message -----
From: [REDACTED]@imsa.edu>
Date: Thu, Mar 3, 2022 at 8:20 AM
Subject: BHSC Retreat March 12, 2022
To:
Cc: [REDACTED]@imsa.edu>

Hello IMSA students,

The Office of Diversity, Equity and Inclusion along with Brotherhood and Sister circle will be hosting a retreat on Saturday, March 12. The details and schedule are in the attached letter.

Don't miss this opportunity to meet and connect with other Black and Latinx students, staff and alumni in a forum that celebrates you!

Contact [REDACTED]@imsa.edu or [REDACTED]@imsa.edu with any questions.

Kind regards,
[REDACTED]
Director of Pre-Enrollment Programs
Enrollment Management
LEARNER | ACHIEVER | CONNECTEDNESS | BELIEF | RESPONSIBILITY
Pronouns: She, Her, Hers
Illinois Mathematics and Science Academy

Ex. B at 1

Re: BHSC Retreat

Subject: Re: BHSC Retreat
From: [Redacted]@imsa.edu>
Date: 3/10/22, 8:43 AM
To: [Redacted]@imsa.edu>

Sure, what are your concerns?

Director of Equity and Inclusion
Pronouns: She, Her, Hers

https://www.bepress.com/ed/inac_colleam/

Have you experienced racism, microaggressions or bias at IMSA? Report it here: <https://bit.ly/2BS2DAP>

On Thu, Mar 10, 2022 at 8:01 AM [Redacted]@imsa.edu> wrote:
Let's talk about this more. I have some concerns.

On Thu, Mar 10, 2022 at 7:59 AM [Redacted]@imsa.edu> wrote:

Hi [Redacted],
I would ask for Black/Latinx photographers so that pictures can be taken throughout the day.

Director of Equity and Inclusion
Pronouns: She, Her, Hers

https://www.bepress.com/ed/inac_colleam/

Have you experienced racism, microaggressions or bias at IMSA? Report it here: <https://bit.ly/2BS2DAP>

On Thu, Mar 10, 2022 at 7:49 AM [Redacted]@imsa.edu> wrote:

Your staff may attend the keynote presentation and take photos between 1:30 to 2:20 in the Lexington cafeteria. All of the other sessions are closed sessions. Please speak with a staff member before you begin taking photos. Let me know if you have any questions.

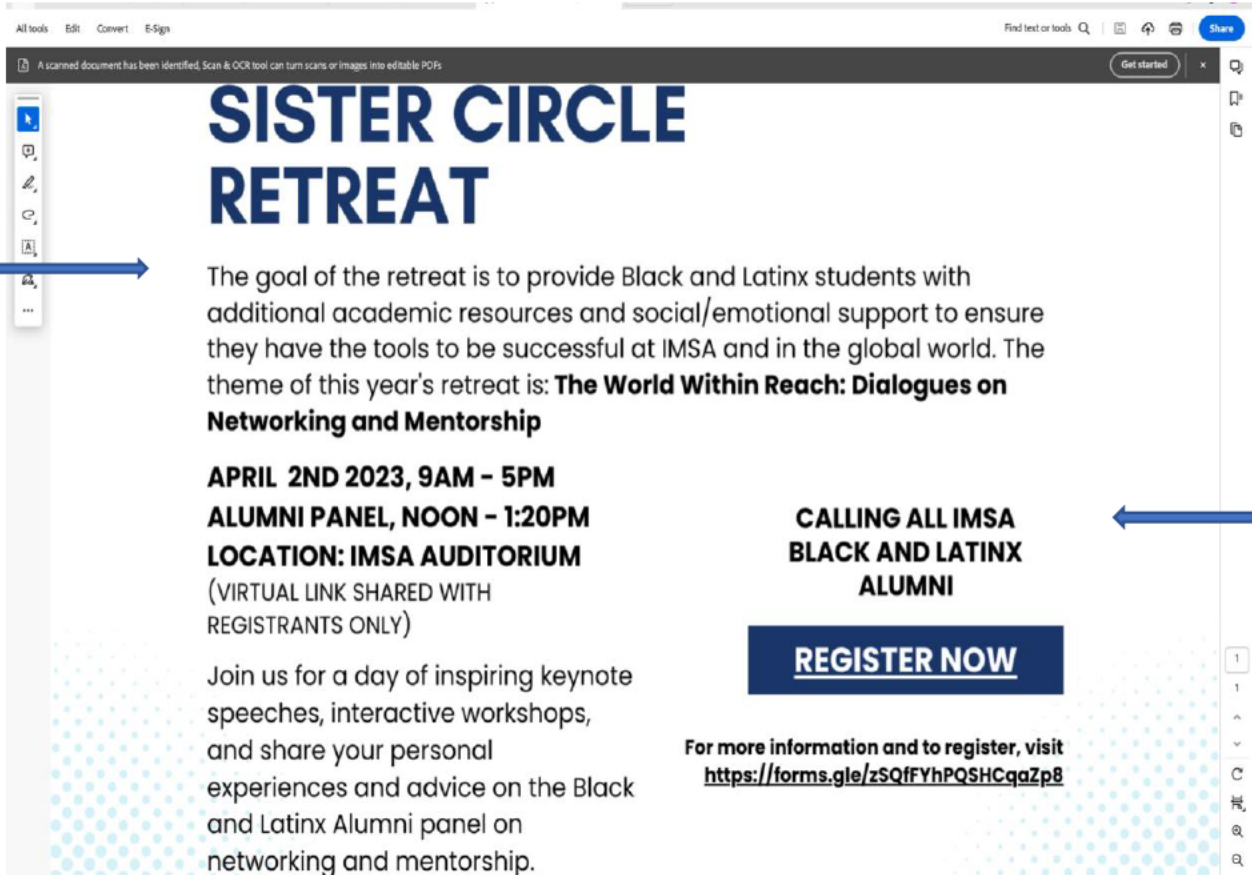




EXHIBIT C



BROTHERHOOD SISTER CIRCLE



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A scanned document has been identified. Scan & OCR tool can turn scans or images into editable PDFs. Get started

SISTER CIRCLE RETREAT

The goal of the retreat is to provide Black and Latinx students with additional academic resources and social/emotional support to ensure they have the tools to be successful at IMSA and in the global world. The theme of this year's retreat is: **The World Within Reach: Dialogues on Networking and Mentorship**

APRIL 2ND 2023, 9AM - 5PM
ALUMNI PANEL, NOON - 1:20PM
LOCATION: IMSA AUDITORIUM
(VIRTUAL LINK SHARED WITH REGISTRANTS ONLY)

Join us for a day of inspiring keynote speeches, interactive workshops, and share your personal experiences and advice on the Black and Latinx Alumni panel on networking and mentorship.

CALLING ALL IMSA BLACK AND LATINX ALUMNI

REGISTER NOW

For more information and to register, visit <https://forms.gle/zSQfFYhPQSHCqZp8>



BHSC X ODEI PRESENTS

BHSC RETREAT

Event for Black and Latinx students to engage in meaningful conversations, fun activities, and meet alumni.

03.12.2022 | 12 PM
ALUMNI PANEL

Registration Link:
<https://forms.gle/zmXjsTLKkcu6ykhW9>



PHOTO: TARA



EXHIBIT D



Illinois Mathematics and Science Academy

630.907.5000 . 1500 SULLIVAN ROAD, AURORA, IL 60506-1000 . IMSA.EDU

January 14, 2020

Dear IMSA Parent:

The Black and Latinx faculty/staff at IMSA meet to discuss strategies to provide additional support for Black and Latinx students. This year, the group is hosting a retreat for students on Saturday February 1st. As a strategy of the IMSA Board of Trustees approved Equity and Excellence Policy (<https://go.boarddocs.com/il/imsa/Board.nsf/goto?open&id=AXVRKP68F803>), the goal of the retreat is to provide Black and Latinx students with additional academic resources and social/emotional support to ensure they have the tools to be successful at IMSA and in the global world. The theme of this year's retreat is:

Building Unity and Strengthening Resilience

Saturday, February 1, 2020

10:00am – 11:00am: Activities and Icebreakers led by **Brotherhood and Sister Circle**

11:00am - 11:15am: Kick-off/Introduction

Dr. Jose Torres, President and CEO, IMSA

11:15am - 12:15pm: Unity and Developing Your Community

Ex. D at 1



11:15am - 12:15pm: Unity and Developing Your Community

A session that will equip students with the strategies and tools necessary to create a community for themselves here at IMSA. Provide students with insight into how they can look out for one another within this community of IMSA.

Betty Hart, Innovation Center Program Manager, IMSA

Jerami Johnson, Assistant Director of Residence Life, IMSA

12:15pm – 12:55pm: Brunch

1:00pm – 2:00pm: Alumni Panel

2:05pm – 3:00pm: Breakout Sessions

Strengthening Resilience in Young Men of Color

Dr. Storm Robinson, Chief Innovation and Education Officer, IMSA

→ *How do we continue to empower our Young Women of Color?*

Alexis Thomas, Chief Strategic Partnership and Initiatives Officer, IMSA

→ 3:05pm – 4:00pm: Black and Latinx Emotional Social Well-being in a Radicalized Society

Takeisha Rheams, School Counselor, IMSA

4:05pm – 5:00pm: Unity by Developing Your Community and Empowering Yourself

A session that will tie many of the topics covered together, and give valuable lessons on the strength from within. How do we empower ourselves, as young men and women, to believe we can do for ourselves beyond IMSA?

Traci Ellis, Chief Human Resource Officer and Chief Equity Officer, IMSA

5:00pm – 5:45pm: Wrap-up/Clean-up

5:45pm – 6:30pm: Dinner

6:45pm – 10:00pm: Evening Activity (Round One, Escape Room, or Main Event)



5:45pm – 6:30pm: Dinner

6:45pm – 10:00pm: Evening Activity (Round One, Escape Room, or Main Event)

As parents of gifted and talented CLED students, we need your support in encouraging your student to attend this event and in understanding its' importance. This is an effort to provide students with the tools they need to thrive at IMSA and matriculate to the higher education institution of their choice. Although this event is not mandatory, attendance is strongly encouraged. Please use the link below to register your student(s) for the retreat:

<https://forms.gle/Nak8oMDEBSLWVfsm9>

If you have any questions or concerns, please contact Dr. Adrienne Coleman, 630.907.5079 - acoleman@imsa.edu or Denna Mohamed, 630.907.5952 - dmohamed@imsa.edu

Sincerely,

A handwritten signature in black ink that reads "Adrienne L. Coleman".

Adrienne Coleman, Ed.D.
Director of Equity and Inclusion

Page 2 of 2

Ex. D at 4