



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS
ADMINISTRATIVE COMPLAINT

October 31, 2025

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.

Defending Education (DE) brings this complaint against Princeton University for discrimination on the basis of sex in programs or activities that receive federal financial assistance in violation of Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et. seq.*

DE brings this complaint as an interested third-party organization with members who are parents of students throughout the country. DE and its members oppose, among other things, discrimination on the basis of sex in America's K-12 schools and institutions of higher education. Title IX prohibits discrimination based on sex in any education program or activity receiving federal financial assistance. This includes female students' rights to sex-segregated intimate spaces.¹

Princeton University is older than the United States of America. It has a history not only of academic excellence, but also of a commitment to human equality.² Princeton's sixth president, for example, signed the Declaration of Independence;³ and Princeton counts two United States Presidents and twelve Supreme Court justices among its alumni. This rich history only makes Princeton's violation of Title IX all the more tragic.

¹In *United States v. Virginia*, 518 U.S. 515 (1996), the Supreme Court held that parties who seek to defend sex-based government action must demonstrate an "exceedingly persuasive justification" for that action.

² *Our History*, Princeton University (accessed Oct. 21, 2025), <https://shorturl.at/N27Gs>.

³ *Witherspoon, John*, Princetoniana Museum (accessed Oct. 21, 2025), <https://shorturl.at/NW4IT>.

Princeton University offers 250 gender-inclusive restrooms, boasts all-gender dorms, and prescribes hormone replacement therapy to students—despite federal law and federal directives to the contrary.⁴ Astonishingly, Princeton also offers two distinct graduation ceremonies: 1) a “Rose Graduation” ceremony, “celebrating *women and fem* accomplishments and achievements,” and 2) a “Lavender Graduation” ceremony “celebrating *queer and trans* accomplishments and achievements.”⁵

Princeton admits that Title IX prohibits discrimination on the basis of *sex*,⁶ but Princeton’s Office of Institutional Equity and Diversity equates sex discrimination with “[s]ex or gender discrimination.”⁷ Gender identity discrimination is not the same as sex discrimination under Title IX, and the Supreme Court has never held otherwise.⁸ Nevertheless, Princeton has prioritized some students’ subjective feelings over all female Princeton students’ rights to sex-segregated intimate spaces. Princeton takes great pride in this, writing on the landing page for its “Gender Sexuality Resource Center” that, “[s]ince the early 2000s, members of the Princeton University administration have been working to improve services and support for transgender students as well as streamline processes to make the experience easier for those who want to access any kinds of medical transition. Princeton is considered a leader among colleges and universities for our support for transgender students and was featured in the Advocate as a Top 10 Trans-Friendly University.”⁹

Princeton’s bathroom policy for two residential colleges, Yeh College and New College West, appears to violate Title IX. It also violates Presidential Executive Order 14168 regarding sex discrimination in federally funded programs;¹⁰ and it contravenes this Department’s stakeholder guidance on Title IX and the prevention of sex discrimination in federally funded programs.¹¹

Yeh College and New College West each house roughly 500 students;¹² and Princeton forces them to share “gender-neutral” bathrooms. These bathrooms have “multiple showers and toilet stalls,” and “[r]esidents

⁴ See e.g., Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government” (Jan. 20, 2025), <https://shorturl.at/23BIO>. This Department may be interested in Princeton’s continued provision of “trans-affirming” primary care, which appears to violate Executive Order 14187, “Protecting Children from Chemical and Surgical Mutilation” (Jan. 28, 2025), <https://shorturl.at/NVA2I>.

⁵ *Affinity Graduations*, Princeton University Gender Sexuality Resource Center (accessed Oct. 24, 2025), <https://shorturl.at/NobGq> (emphasis added).

⁶ *Title IX Sexual Harassment Policy*, Princeton University (May 2025), <http://bit.ly/47wdKue>.

⁷ *Definitions*, Princeton University Office of Institutional Equity & Diversity (accessed Oct. 20, 2025), <https://shorturl.at/eIbT5> (emphasis added).

⁸ See *United States v. Skrametti*, 145 S. Ct. 1816, 1831-32 (2025). And *Bostock v. Clayton County*, 590 U.S. 644 (2020), does not hold otherwise. Quite the opposite, in fact. *Bostock* confirms that “sex” refers “only to biological distinctions between male and female.” *Id.* at 655. And to the extent *Bostock* could be read to confuse gender identity with biological sex, its logic is confined to Title VII. See, e.g., *Skrametti*, 145 S. Ct. at 1834 (explaining that *Bostock*’s rationale does not necessarily “reac[h] beyond the Title VII context”); *Department of Education v. Louisiana*, 603 U.S. 866, 867 (2024) (“all Members of the Court” agreed to enjoin a federal rule that extended *Bostock*’s reasoning to Title IX).

⁹ *Trans at Princeton Resources*, Princeton University Gender Sexuality Resource Center (accessed Oct. 24, 2025), <https://shorturl.at/FH5II>.

¹⁰ See Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government” (Jan. 20, 2025), <https://shorturl.at/23BIO>.

¹¹ Press Release: “U.S. Department of Education to Enforce 2020 Title IX Rule Protecting Women,” U.S. Department of Education (accessed Sept. 15, 2025), <https://shorturl.at/jNYhL>.

¹² *Princeton University — New Residential Colleges Built for Community*, Ten Berke (accessed Oct 21, 2025), <http://bit.ly/3WuZAEb>.

walk through a common restroom space to enter said stalls.”¹³ Princeton lists this “gender neutral restroom” arrangement on the webpage of each dormitory associated with either Yeh College or New College West.¹⁴

First-year Princeton students cannot “opt out” of the communal bathroom arrangement because Princeton “randomly assign[s]” first-year students to one of seven residential colleges.¹⁵ As a result, Princeton forces female students to use “communal bathroom stalls [that] have gaps, which makes using them feel less safe and private,” and which creates situations where female students “wal[k] in on guys literally peeing standing up with the door open.”¹⁶

Princeton offers limited exemptions from the communal bathrooms, but only for medical or safety reasons, and it cannot accommodate all requests. Moreover, while Princeton offers these medical and safety exceptions, it refuses to grant religious exemptions. This discriminates against many female religious Princeton students, such as hijabi students, whose faith regulates interactions with male students in private spaces.¹⁷

Understandably, many female students have protested these bathroom policies. As one student put it in *The Daily Princetonian*, “knowing that there are male students in a place that I’ve always considered a safe haven scares me.”¹⁸ Another student article emphasized that “having the option to be surrounded by” only female students “would be really nice and less stressful.”¹⁹ A third female student concluded: “[N]o student should have to share a bathroom with the opposite [sex] if they do not feel comfortable doing so.”²⁰ Yet Princeton forces female students to do exactly that.

In short, the reality of biological sex is a fiction at Princeton University.

Parents of Princeton students have also objected to the arrangement. Defending Education recently received a copy of an email (Exhibit A) between a Princeton parent and Princeton’s Associate Dean of Undergraduate Students. The email describes the bathroom arrangement in New College West, along with the parent’s objections (on religious and safety grounds) to her daughter’s living arrangement. The Associate Dean acknowledges the bathroom policy’s existence and says he informed the University of the parent’s concerns, but the Associate Dean ultimately took no action to change the policy.

¹³ Joe Tyson, *USG Senate Passes Referendum Calling on Princeton to Make a Majority of Residential College Restrooms Gender Neutral*, *The Princeton Tory* (Nov. 16, 2022), <https://shorturl.at/1s64I>.

¹⁴ See e.g., *Kanji Hall*, Princeton University (accessed Oct. 21, 2025), <http://bit.ly/3J70dRN>; *Kwanza Jones Hall*, Princeton University (accessed Oct. 21, 2025), <http://bit.ly/4nx0rzI>; *Mannion Hall*, Princeton University (accessed Oct. 21, 2025), <https://shorturl.at/pzXAS>; *Grousbeck Hall*, Princeton University (accessed Oct. 21, 2025), <https://shorturl.at/CpTOX>.

¹⁵ Those residential colleges are Butler, Forbes, Mathey, New College West, Rockefeller, Whitman, and Yeh College. See *Residential Colleges & Housing: On-Campus Housing*, Princeton University (accessed Oct. 21, 2025), <https://shorturl.at/kvLOI>.

¹⁶ Ndeye Thioubou, *Princeton must create an equitable experience for hijabis using communal bathrooms*, *The Daily Princetonian* (Sept. 20, 2023), <https://shorturl.at/d9CM8>.

¹⁷ *Id.*

¹⁸ Julianna Lee, *Let’s add gender-neutral bathrooms without taking away existing single-sex bathrooms*, *The Daily Princetonian* (Dec. 11, 2022), <http://bit.ly/4hsXMP6>.

¹⁹ Thioubou, *supra* note 16.

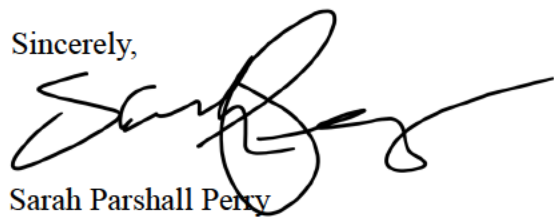
²⁰ *Id.*

The Education Department's own guidance on Title IX clarifies that covered educational programs and activities include: "[A]ll the operations of a school that receives financial assistance.... Title IX applies to all operations of a school, including those that take place in the facilities of the school, on a school bus, or in a class or training program sponsored by the school at another location."²¹

Princeton's policies appear to violate Title IX. Accordingly, we ask that the Department promptly investigate all the allegations in this complaint, act swiftly to remedy unlawful policies and practices, and order appropriate relief.

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, appearing to read 'Sarah Parshall Perry', with a long horizontal flourish extending to the right.

Sarah Parshall Perry
Vice President and Legal Fellow
Defending Education

²¹ *Frequently Asked Questions: Sex Discrimination*, U.S. Department of Education (accessed Oct. 20, 2025), <http://bit.ly/47u9tHs>.

EXHIBIT A

[REDACTED]

Sent: Saturday, September 13, 2025

10:41 AM

To: [REDACTED]@princeton.edu

<[REDACTED]@princeton.edu>

Subject: Concerns regarding all-gender
bathrooms

Dear Dean for Student Life,

My daughter is a Princeton Class of 2029 student residing in Kangi Hall, New College West. I want to express my concern regarding the all-gender bathrooms, which I found on the second floor during move-in day. At that time, I saw a sign with only sink, toilet, and shower on the wall next to the bathroom door. I walked the entire floor but could not find a bathroom with a sex-specific sign. I was very shocked by the bathroom arrangement at Kangi Hall, New College West.



I understand that NCW is an all-gender residential college, but it's not right to create all-gender bathrooms for students who are still young adults. Allowing all-gender bathrooms in a residential college can lead to various issues:

1. **Privacy Concerns:** As a mother, I don't want my daughter to be forced to use all-gender bathrooms, which are places for confidential activities like changing or using the restroom.
2. **Safety Concerns:** No one can really guarantee that inappropriate behavior or misuse of shared bathrooms won't happen. I keep telling my daughter to be extra careful when she uses these bathrooms, especially knowing that women have been victimized in bathrooms all over the country.
3. **Cultural and Religious Beliefs:** Our family's cultural background and religious beliefs do not accept gender-mixed bathrooms. God created man and woman, and He requires us to follow His design. Men and women are different; each gender should respect and honor



each gender should respect and honor the other. Using single-sex spaces is a way to show respect for these differences.

Earlier this year, the federal government explicitly stated that it recognizes only two sexes—male and female. Efforts to deny the biological reality of sex directly threaten women's dignity, safety, and well-being. As long as Princeton University receives federal funding, it has a responsibility to comply with these federal requirements.

While I understand it may be difficult to eliminate all-gender bathrooms this school year, I hope the university will consider changing this arrangement for the next academic year. Please raise this concern with the appropriate officials. I believe that parents have the right to report such issues to the Department of Education if they are not properly addressed.

Lastly, adding a sex-specific sign to the bathroom is common sense. I believe that a prestigious university like Princeton would



While I understand it may be difficult to eliminate all-gender bathrooms this school year, I hope the university will consider changing this arrangement for the next academic year. Please raise this concern with the appropriate officials. I believe that parents have the right to report such issues to the Department of Education if they are not properly addressed.

Lastly, adding a sex-specific sign to the bathroom is common sense. I believe that a prestigious university like Princeton would support basic common sense and make sure these simple measures are in place to protect the well-being and dignity of all students.

Thank you very much for taking care of our children!



From: [REDACTED]

<[REDACTED]@princeton.edu>

Sent: Monday, September 15, 2025 3:50 PM

To: [REDACTED]

Subject: RE: Concerns regarding all-gender bathrooms

Dear [REDACTED]

I hope you are doing well. Thank you for reaching out and sharing these concerns. I will reach out to [REDACTED] to schedule a time to meet with her and will be happy to provide support to her regarding any concerns she may have; as well as helping her explore available options.

Sincerely,

[REDACTED]



[REDACTED]

Sent: Monday, September 15, 2025 4:46 PM

To: [REDACTED]
[REDACTED]@princeton.edu>

Subject: 回复: Concerns regarding all-gender bathrooms

Hi Mr. [REDACTED]

Thank you for your prompt response! I think it's better not to reach out to [REDACTED] about this topic right now. Although she is an adult, I believe having a conversation with a school official about this might not be ideal at this moment, as she has just settled into a new environment. I don't want to put unnecessary pressure on her. On move-in day, all I could do was remind her a couple of times to be very careful when using the bathroom.



official about this might not be ideal at this moment, as she has just settled into a new environment. I don't want to put unnecessary pressure on her. On move-in day, all I could do was remind her a couple of times to be very careful when using the bathroom.

I understand that the student's opinions are more important to the school. However, as a young adult with limited experience in society, [REDACTED] may not fully understand the deeper issues surrounding all-gender bathrooms. As a parent, I feel it's my responsibility to raise this concern with the school. On move-in day, I learned that other parents share similar concerns. Therefore, I would like you to raise this concern to the appropriate officials. Please let me know how the university will address this concern.

We can schedule a talk if you are available.

Thank you again for your reply!

[REDACTED]



From: [REDACTED]

[REDACTED]@princeton.edu>

Sent: Friday, September 19, 2025 9:09 AM

To: [REDACTED]

Subject: RE: Concerns regarding all-gender bathrooms

Dear [REDACTED]

Thank you for following up. I wanted to let you know that I have shared your concerns with the appropriate offices at the University.

Per your request, I have not reached out to [REDACTED]

[REDACTED] Please do encourage her to be in touch with me directly if she has any concerns or if I can provide any support about options, etc. (for this year or subsequent years).



To:

Subject: RE: Concerns regarding all-gender bathrooms

Dear

Thank you for following up. I wanted to let you know that I have shared your concerns with the appropriate offices at the University.

Per your request, I have not reached out to Please do encourage her to be in touch with me directly if she has any concerns or if I can provide any support about options, etc. (for this year or subsequent years).

I hope you have a good weekend.

Sincerely,



[REDACTED]

Sent: Friday, September 19, 2025 2:14 PM

To: [REDACTED]
[REDACTED]@princeton.edu>

Subject: 回复: Concerns regarding all-gender bathrooms

Hi Mr. [REDACTED]

Thank you for your efforts and consideration! Please keep me updated on how the relevant officials address this concern. I would like to participate in any discussions if the university seeks parents' opinions. Please let the relevant officials know that I sincerely hope this issue can be resolved smoothly without involving OCR at the Department of Education.

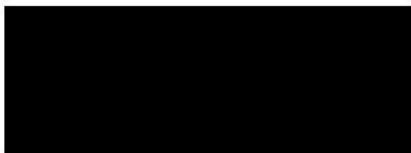
As a mother, I truly appreciate your dedicated work for our children from the bottom of my heart. Thank you for protecting our children!



officials address this concern. I would like to participate in any discussions if the university seeks parents' opinions. Please let the relevant officials know that I sincerely hope this issue can be resolved smoothly without involving OCR at the Department of Education.

As a mother, I truly appreciate your dedicated work for our children from the bottom of my heart. Thank you for protecting our children!

Have a great weekend!



发件人: [REDACTED]@princeton.edu>

发送时间: 2025年9月19日 13:09



主题: RE: Concerns regarding all-gender
bathrooms







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Affinity Graduations

Annually, the GSRC organizes two distinct affinity graduations that help drive our mission of fostering a supportive and inclusive campus community that affirms women, fem, trans, and queer Princetonians.

- **Rose Graduation** is a ceremony celebrating women and fem accomplishments and achievements
- **Lavender Graduation** is a ceremony celebrating queer and trans accomplishments and achievements

Details about our Rose and Lavender Graduations will be shared towards the end of 2025, stay tuned!

Please note, our affinity graduations & awards nominations are open to all graduating Princeton University students regardless of identity.

