



November 3, 2025

VIA EMAIL

Denver Office
Office for Civil Rights
U.S. Department of Education
OCR.Denver@ed.gov

Atlanta Office
Office for Civil Rights
U.S. Department of Education
OCR.Atlanta@ed.gov

Re: YAF's SECOND Civil Rights Complaint Against Embry-Riddle Aeronautical University for Violations of Equal Protection, Title VI, Title IX, and Trump Administration Directives

Dear Office for Civil Rights,

On behalf of Young Americans for Freedom at Embry-Riddle Aeronautical University (the YAF chapter) Young America's Foundation (YAF) writes to alert you to significant and ongoing civil rights violations against conservative students at Embry-Riddle Aeronautical University (ERAU).

Jurisdiction

Your office has jurisdiction over this complaint because ERAU receives federal funds. ERAU's 2024 Form 990 reflects federal support in the amount of \$61,938,804.00.¹ Jurisdiction also lies because the facts presented allege violations of federal law, including Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments Act of 1972, with the most recent discrete violation occurring on an ongoing basis as-of the filing of this complaint.

Factual Background

Just like officials at ERAU banned all dissent against radical gender ideology last semester (repeatedly banning detransitioner and truth-teller Chloe Cole from speaking and censoring expression of the idea that sex is binary),² ERAU officials are now banning all dissent against DEI and left-wing racism—and are twisting President Trump's own executive order as an excuse to do so.

¹ <https://erau.edu/-/media/files/university/tax-information/erau-fy24-form-990.pdf>

² Hahn, Madison, *YAF Demands Repeal of Embry-Riddle's Totalitarian Speech Ban*, New Guard, Jan. 15, 2025, <https://yaf.org/news/yaf-demands-repeal-of-embry-riddles-totalitarian-speech-ban/>

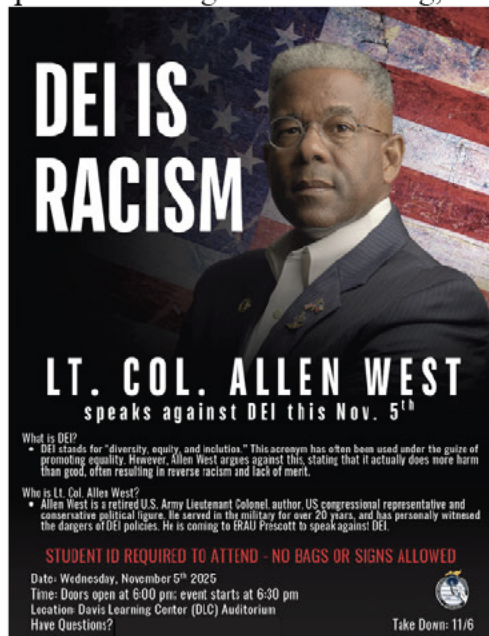


After initially approving a request by the YAF Chapter (led by Chairman Benjamin Isbell) to host a lecture by Lt. Col. Allen West, ERAU took decisive action to suppress the event's impact.

Lt. Col. West is a prominent figure, known for his patriotic values and service to his country both in the military and in Congress. The YAF chapter invited him to speak because ERAU, once known as an institution committed to defending American freedom, has fallen into the desolate hellhole of leftist propaganda that suppresses the rights of its own students. Benjamin believed West's views would offer a welcome counter to official campus dialogue.

To host a successful event, the YAF chapter needs to advertise. Problematically, ERAU requires students to obtain pre-approval of posters.³ Most pre-approval requirements are technical, prescribing things like poster size or duration. And while the policy gives ERAU officials shockingly unbridled discretion to ban posters that "demean" someone, it does not give the authority to ban topics. As this complaint will show, ERAU officials claimed such discretion anyway, contra to ERAU's own posting and freedom of expression policies⁴ and Equal Protection law. And the individual vested with this so-called discretion, Molly Webb, Acting Interim Director for the Department of Student Engagement, appears to hold radically leftwing values. As you can see below, Webb's email signature shows she ascribes to extreme gender ideology, announcing "she/her" pronouns.

Benjamin submitted a poster featuring West and stating, "DEI is Racism."



³ <https://eaglelife.erau.edu/dse/marketing/>

⁴ This policy recognizes the First Amendment's broad promises and claims the right to restrict the time, place, and manner of speech for the purpose of health and/or safety. Nowhere does it claim the right to protect students or officials (who indeed seem to be the ones offended here) against different opinions. <https://prescott.erau.edu/campus-life/dean-of-students/student-handbook/standards-of-conduct#campus-expression>



Although this poster met all technical and content requirements, Webb promptly rejected it.

Hi Benjamin,

As per your request over the phone I'm reaching out to let you know what changes need to be made in order for the attached flyer that you submitted to be approved.

The following statements must be removed:

- DEI IS RACISM
- speaks against DEI
- What is DEI?

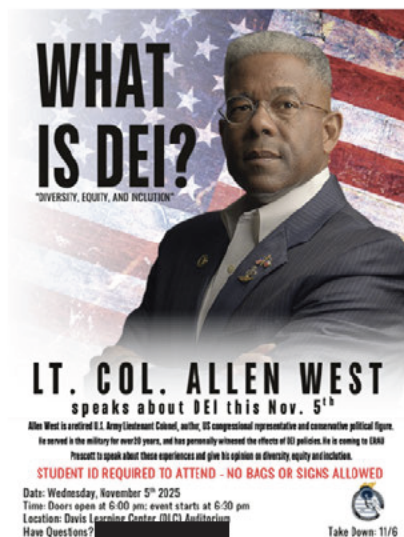
- DEI stands for "diversity, equity, and inclusion." This acronym has often been used under the guise of promoting quality. However, Allen West argues against this, stating that it actually does more harm than good, often resulting in reverse racism and lack of merit.
- ..., and has personally witnessed the dangers of DEI policies. He is coming to ERAU Prescott to speak against DEI.

All the best,

Molly Webb *(she/her)*

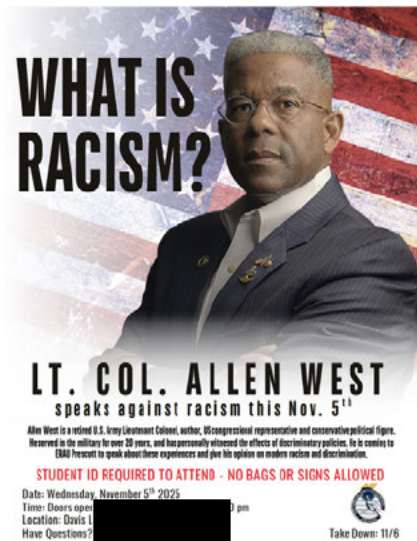
In person, Webb told Benjamin she was rejecting the poster because President Trump had issued an executive order against DEI, using the administration's own words decrying DEI as destructive as an excuse to ban dissent against DEI. Webb tellingly refused to commit her words to writing.

Benjamin, trying to be a good sport, watered down his message to "What is DEI?" Although this poster met all technical and content requirements, Webb denied this for the same reason.





Benjamin then submitted a third, significantly dulled-down poster asking, “What is Racism?”



As Benjamin highlighted in his communications with Webb, this effort reflected his very best attempt to submit an “acceptable” poster without completely throwing out the topic of the lecture.

Sent: Tuesday, October 28, 2025 2:10 PM
To: Webb, Molly <WEBBM3@erau.edu>
Cc: Shastri, Aditya <SHASTRIA@my.erau.edu>
Subject: Flyer # 3.1

Hi Molly

Thank you for the info this morning. In light of my lack of confidence in them approving the flyer I sent over—and given that we need one approved ASAP while the school continues to drag its feet until the very last minute—I’ve gone ahead and preemptively prepared another version for review. This way, once they inevitably deny the one currently in the pipeline, we’ll be ready to move forward without delay.

This version does not mention DEI at all and should, hopefully, appease our overlords!

Thank you for your refreshing transparency, and I look forward to getting this resolved in a timely manner.

This version intentionally omitted any reference to DEI and met all technical and content requirements. But even this simple, nonpolitical question was too much for Webb, who denied the poster because it violated ERAU’s unlawful Speech Ban. This Speech Ban was at the heart of YAF’s first civil rights complaint against ERAU.⁵ Under the Speech Ban, ERAU claims the right to prohibit “any outdoor events and demonstrations” “related to religious and political causes,” regardless of Equal Protection or other legal protections. As YAF’s first complaint details, and this complaint will show, ERAU officials enforce this ban selectively, favoring leftist views over conservative ones.

⁵ Filed Feb. 19, 2025



Contemporaneously recapping his October 29, 2025 in-person meeting with Webb, the Assistant Director of Safety and Security, and representatives from the media department, Benjamin highlighted his efforts to comply with ghastly unreasonable school policy and the harm his YAF chapter would endure because of ERAU officials' censorship.

I wanted to bring to your attention some serious concerns that came up during a production meeting regarding our upcoming event.

During the meeting, Molly Webb, Acting Interim Director for the Department of Student Engagement (DSE), stated that all flyers must be reviewed for any content deemed "political." Two of our flyers were denied on that basis, and the third — which intentionally avoided any mention of DEI and simply stated that Lt. Col. Allen West is not okay with racism — was also rejected.

I was told this decision was based on the university's interpretation of President Trump's Executive Order regarding DEI, as well as a new October 24th policy banning anything considered "political" from being displayed in public campus spaces. Additionally, I was informed that while tabling to promote the event, I am not allowed to deviate from what is printed on the flyer. Since our flyers were stripped of the topic Lt. Col. West will be speaking about, I was told that if a student asks about it, I cannot answer — and that doing so would be considered a violation of policy.

This directly impacts my ability to promote not only this event but also my club's overall mission. I feel this is an unequal and unfair restriction that prevents conservative students from being treated the same as others on campus. The administration's actions under the guise of "safety" appear to silence certain viewpoints rather than protect students.

As a U.S. Army veteran who fought to defend free speech, I find it deeply troubling that I am being threatened with disciplinary action simply for answering honest questions or engaging in dialogue. The current climate at Embry-Riddle is beginning to resemble the behavior of the Chinese Communist Party more than that of an American university. It seems that dissenting viewpoints are not debated — they are suppressed.

Indeed, Benjamin's fears of discrimination and of being "silenced" for his views are on target: ERAU officials' obvious goal is to suppress Benjamin's ideas. They want to suppress turnout by forcing Benjamin to water down his message. This is especially plain since YAF filed a similar complaint with your office mere months ago. As noted in this complaint's conclusion, ERAU officials, in the spotlight of YAF's first complaint, briefly made minimal overtures to approve (with restrictions) a single event. ERAU also parted ways with the administrator at the center of that first complaint.⁶ Now, removed by time from that initial fear of investigation, ERAU officials have fully rebounded⁷ to censorship.

And Webb went further than her attempts to suppress turnout. She also instructed Benjamin that any topic not listed in the poster was off-limits. In Benjamin's contemporaneous record of the in-person meeting, he stated that "[s]ince our flyers were stripped of the topic Lt. Col. West will be speaking about, I was told that if a student asks about it, I cannot answer — and that doing so would be considered a violation of policy." Webb has therefore set Benjamin up for disciplinary action as a condition of exercising his rights.

⁶ Web informed YAF on Oct 29 that Tempas ("she/her") no longer worked at ERAU. YAF contacted Tempas via LinkedIn to confirm this, as Tempas' LinkedIn profile listed ERAU as her current employer. Tempas did not directly respond, but she did update her profile to list a new employer as-of October 2025.

⁷ "Embry-Riddle Doubles Down on Gender Insanity in Violation of Trump Order" <https://yaf.org/news/embry-riddle-doubles-down-on-gender-insanity-in-violation-of-trump-order/>



It also is worth noting that ERAU and YAF have a contract ensuring West's ability to speak. This contract does not give ERAU the right to limit the content of West's speech, and more importantly, under its own terms, supersedes all other prior written and verbal agreements, representations, promises or understandings between the ERAU and YAF regarding the speech, including any such representations made by Webb. Webb has no authority whatsoever to limit West's topic. Webb conveniently went on leave immediately after rejecting the third poster.

Even after the October 29 meeting, Benjamin made one last attempt to promote his event within ERAU's unlawful policies, submitting the following:

CENSORED
as per university policy

Your fascist university has censored the topic of this event and is attempting to control the exposure of viewpoints that they disagree with. This is a violation of free speech and is hostile to our free, democratic society.

Please explore other ways of learning about this event (its gonna be lit)!

@yaf_erau

LT. COL. ALLEN WEST
speaks about **CENSORED** this Nov. 5th

Allen West is a retired U.S. Army Lieutenant Colonel, author, US congressional representative and conservative political figure. He served in the military for over 20 years, and has been a frequent guest on Fox News. He is coming to ERAU Prescott to speak about these exp **CENSORED** **CENSORED**

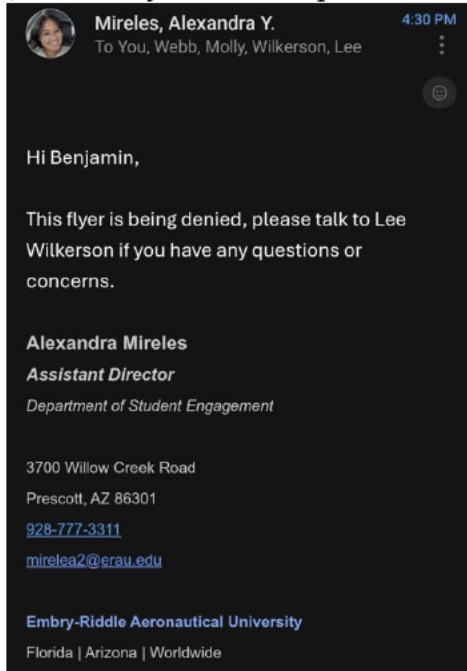
STUDENT ID REQUIRED TO ATTEND - NO BAGS OR SIGNS ALLOWED

Date: Wednesday, November 5th 2025
Time: Doors open at 6:15 pm; event starts at 6:30 pm
Location: Davis Learning Center (DLC) Auditorium
Have Questions? [REDACTED]

Take Down: 11/6



An official, Alexandra Mireles, summarily denied this poster as well.



In person, Mireles admitted to Benjamin that the content was the only thing standing between Benjamin and poster approval. **Benjamin asked whether ERAU officials were denying the poster because it defied the school's "indoctrination bubble, because we're going against it and you don't like it," and Mireles replied "yeah, basically. Easy way to put it."** She also confirmed the YAF event is a "red flag" and "high risk." Mireles indicated she was acting at the direct instruction of Webb and Wilkerson.

Webb has also banned the YAF chapter from tabling unless and until they submit a poster she likes.

ERAU officials therefore have set Benjamin and his YAF chapter up: they can either host a milquetoast and monotonous lecture on no topic at all, or they can open themselves up for discipline by speaking on topics not listed in their poster. And either way, they are prohibited from taking basic steps open to similarly situated leftist students to seek an audience.

Authority

1. **Title VI of the Civil Rights Act of 1964.** Under Title VI, “[n]o 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.” “The purpose of Title VI is simple: to ensure that



public funds are not spent in a way that encourages, subsidizes, or results in discrimination on these bases. Toward that end, Title VI bars intentional discrimination.”⁸

OCR has authority to “investigate complaints that students were...harassed for how they...speak in ways linked to ethnicity or ancestry.”⁹ The DOJ, quoting President John F. Kennedy, holds fast to the promise that “[s]imple justice requires that public funds, to which all taxpayers of all races [colors, and national origins] contribute, not be spent in any fashion which encourages, entrenches, subsidizes or results in racial [color or national origin] discrimination.”¹⁰

DOJ guidance explains that because the prevention of discrimination is an essential purpose of Title VI, a recipient of federal funds is accountable in all its actions to prohibit such discrimination. The recipient’s obligations are not limited to actions taken solely or specifically against the ultimate beneficiary.¹¹ Thus, ERAU officials are accountable to prevent discrimination on the basis of race, color, and national origin regardless of whether they specifically target the ultimate beneficiary with their actions/inactions. The essential elements of a Title VI claim are (1) there is race or national origin discrimination, and (2) the entity engaged in discrimination is receiving federal financial assistance. *Wells v. E. Baton Rouge Sch. Sys.*, LEXIS 163673, *9 (M.D. La 2024) (citing *Nat'l Ass'n of Gov't Employees v. City Pub. Serv. Bd. of San Antonio*, 40 F.3d 698, 706 n. 9 (5th Cir. 1994)). The facts alleged in this complaint satisfy these elements.

2. **Title IX of the Education Amendments Act of 1972.** Under Title IX, “[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” This law permits certain limited exceptions, such as the mandate for separate bathroom facilities, which are not relevant to this complaint. Sex in the context of Title IX means biological sex. *See, e.g., Tennessee v. Cardona*, 762 F. Supp. 3d 615, 622 (E.D. Ky. 2025) (“Put simply, there is nothing in the text or statutory design of Title IX to suggest that discrimination ‘on the basis of sex’ means anything other than it has since Title IX’s inception—that recipients of federal funds under Title IX may not treat a person worse than another

3. **Executive Order No. 14151.** President Trump has determined to **End Radical and Wasteful Government DEI Programs and Preferencing**. To accomplish this goal,

⁸ DOJ CIVIL RIGHTS TITLE VI LEGAL MANUAL § VI.A.

⁹ <https://www.ed.gov/laws-and-policy/civil-rights-laws/race-color-and-national-origin-discrimination/frequently-asked-questions-race-color-and-national-origin-discrimination>

¹⁰ <https://www.justice.gov/crt/fcs/TitleVI>

¹¹ “Title VI would operate not only to ensure nondiscrimination against homeless people--the ultimate beneficiaries--but would also require the recipient to select the food service contractor in a nondiscriminatory manner. An essential purpose of Title VI--to prevent discrimination--would be undermined if it were limited to ensuring that a homeless shelter was operated in a nondiscriminatory manner, while the process by which such a facility is constructed, supplied, and serviced were free of any such restraints.” [DOJ CIVIL RIGHTS TITLE VI LEGAL MANUAL § VI.V.A.](#)



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.”

4. **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, 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.’”
5. **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.”
6. **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 directives 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.”



Claims

CLAIM 1: ERAU is violating the Equal Protection Clause, Title VI, Title IX, Executive Order 14151, and Executive Order 14168 by banning students from hosting Lt. Col. Allen West to share his opinion on so-called “diversity, equity, and inclusion.”

Of first importance is ERAU officials’ bad faith attempts to manipulate federal directives to serve their attempted subversion of the free marketplace of ideas. **Webb claims she must ban any poster using the letters “DEI” because of Executive Order 14151. This is a gross distortion of federal policy to serve an illegitimate end.** That directive prohibits schools that receive federal funds from promoting DEI policies or programs. It does not prohibit debate on any topic and does not limit student speech. ERAU officials cannot use a federal enforcement policy aimed at them as a sword directed at student speech, especially on contested issues like DEI.

Secondly, **the idea that ERAU officials must ban the YAF chapter’s posters is not just legally and morally unintelligible, but it is also blatantly false.** ERAU officials continue to push DEI. For example:

- ERAU hosts a DEI center:

The screenshot shows the website page for 'prescott.erau.edu/campus-life/student-engagement/clubs'. The main content area is titled 'Get Involved On Campus' and describes the Department of Student Engagement's support for over 120 diverse student organizations. A list of organizations is provided, with 'Center for Diversity & Inclusion' selected. The center's description states it is committed to a welcoming, inclusive, and supportive campus climate for women, people of color, and the LGBTQ community. The right sidebar includes contact information for the Department of Student Engagement and a list of related resources such as Eagle Life, Campus Clubs & Organizations, and Orientation.

- ERAU’s College of Arts and Sciences cites DEI in its “vision, mission, and values”:¹²
 These experiences and opportunities are fortified by **our values, which include** the acquisition of knowledge, open communication, diversity, inclusion and equity, cutting-edge research and a passion for teaching, and life balance.

ERAU also hosts a webpage dedicated to its Office of Diversity and Inclusion.¹³

¹² <https://catalog.erau.edu/prescott/arts-sciences/>

¹³ <https://commons.erau.edu/db-diversity-inclusion/>



commons.erau.edu/db-diversity-inclusion/

Embry-Riddle Aeronautical University
SCHOLARLY COMMONS

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Home > Office of Diversity & Inclusion

Embry-Riddle scholars are from all over the world and represent the best and brightest minds in aviation, aerospace, and related disciplines. It is the uniqueness of individual attributes that makes Embry-Riddle such a great place to learn. The Office of Diversity and Inclusion at the Daytona Beach campus of Embry-Riddle celebrates the diversity of all students, faculty and staff and campaigns for a more inclusive environment through the many programs and services we offer.

D&I provides resources for the diverse people groups on campus including minorities, women, and other underrepresented groups. The mission of the office is to foster a diverse, inclusive campus with programs and services that challenge students' ability to adapt to diverse, inclusive environments, engage in creative, productive and meaningful activities, and understand how their behaviors impact others.

Note: This site for the Office of Diversity & Inclusion is no longer active or being updated.

As you can see from the bottom of this image, ERAU has deactivated the webpage. This is extremely telling: **Some ERAU officials may be making public attempts to hide the school's DEI programs, but Webb's actions against Benjamin and his YAF chapter expose this as a farce.**

The examples cited above are exactly the kinds of programs President Trump referred to when he prohibited "illegal and immoral discrimination programs." It is a backwards and disingenuous interpretation of the Executive Order to blatantly maintain those programs in plain sight, but to ban discussion of why we need them at all—the very discussion at the heart of the Executive Order.

Thirdly, ERAU officials use their power in a discriminatory manner. As stated above, ERAU officials cite their Speech Ban when they desire to silence opposing viewpoints. ERAU's webpage currently states as follows:

EMBRY-RIDDLE
Aeronautical University.
PRESCOTT, ARIZONA

SPIRIT ROCK RESERVATIONS

Political Statements

A political statement is any expression that promotes or opposes specific political ideologies, candidates, policies, laws, or governmental actions. It includes messages that support or critique political parties, movements, or social issues tied to governance, public policy, or violence. These would all be considered inappropriate for the focus on school spirit.

Special messages regarding non-partisan encouragement of voting, messages related to natural disasters, and messages celebrating a national or international holiday or day of significance may be approved by the committee.



The Speech Ban claims to prohibit political speech because such “would all be considered inappropriate for the focus on school spirit.” One is not sure what “would” means. Is this a policy or a suggestion? Indeed ERAU officials cite it like a policy but treat it like a suggestion. Officials permit speech that supports leftwing ideology, including a recent demonstration on school grounds in support of the “Transitioners’ Day of Visibility.”



ERAU also continues to promote gender extremism through its Title IX policy,¹⁴ which recognizes sex-based categories that are not legitimate under federal law.

Effective Date: July 1, 2024

I. Purpose and Scope

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To remedy and prevent discrimination against any employee or applicant on the basis of race, color, religion, sex/gender (including pregnancy, sexual orientation or gender identity)¹, national origin, age (over 40), disability, genetic information (predisposing genetic characteristic), protected veteran status or any protected category under applicable local, state or federal law. This includes protections for those opposing or reporting discrimination or participating in any grievance process on campus, with the Equal Employment Opportunity Commission or other human rights agencies.

Clearly, ERAU officials permit certain views that push DEI or gender extremism, while suppressing opposing ideas. They treat students differently depending on whether they support or dispute gender ideology or DEI. Because these facts show ERAU officials are promoting DEI and radical gender ideology but suppressing anti-DEI expression and are discriminating against individuals on the basis of such expression, these facts are sufficient to state Title VI and Title IX claims.

CLAIM 2: ERAU is violating Title VI, Executive Order 14173, the Equal Protection Clause, and *SFFA v. Harvard* by banning students from hosting Lt. Col. Allen West to share his opinion on racism.

In contrast to its ban on conservative views on racism, ERAU officials currently promote left-wing views on the topic. For example:

- ERAU’s bookstore promotes¹⁵ known racist Ibram X. Kendi’s “Goodnight Racism” for sale:

¹⁴ <https://erau.edu/leadership/title-ix/nondiscrimination-policy>

¹⁵ <https://www.bkstr.com/embryriddleaeronauticalstore/product/goodnight-racism-860856-1>

The screenshot shows the ERAU Bookstore website. At the top, there is a red and white logo for 'YOUNG AMERICA'S FOUNDATION'. Below it, the text 'ERAU BOOKSTORE' and 'Daytona Beach, Florida' is visible. A navigation bar includes 'Shop', 'Textbooks', and a search bar. A dark blue bar at the top lists categories: 'New Arrivals', 'Sale', 'Men', 'Women', 'Kids', 'Gifts', 'Tech'. The main content area displays the book 'Goodnight Racism' by KENDI LIBRAM. The book cover shows a man and a woman. The price is '\$18.99'. Below the price, there are options for payment: 'or pay in installments on orders over \$35.00 with Zelle' and 'PayPal Pay in 4 interest-free payments on purchases of \$30-\$1,500'. There is a 'QUANTITY:' section with a minus sign, the number '1', and a plus sign. Below that is an 'ADD TO BAG' button and a heart icon with the text 'Add to Wishlist'.

One would be hard-pressed to find a more radically racist figure than Kendi. Kendi is well-known for promoting racism, one of his most famous quotes being “The only remedy to past discrimination is present discrimination,”¹⁶—the exact opposite of what the Supreme Court said in *SFFA v. Harvard* (“Eliminating racial discrimination means eliminating all of it.”).¹⁷ Yet ERAU promotes his views on campus while banning those of another, far more honorable black American, Lt. Col. West.

- ERAU’s website also boasts the article, “Combating Racism in STEM: Newly Tenured Professor Walks the Walk.”¹⁸ This professor’s race-based “goal [is] to help more underrepresented students not only succeed” In the article, an ERAU student bemoans that she “struggled to embrace her Hispanic background and lacked confidence as a woman in engineering.” This matches Dr. Long’s own ideology, as he says in the article “You could feel the social isolation and points of systemic racism” in college. Why are these people given university resources to promote their ideas of racism, while YAF is banned from asking simple questions?
- ERAU published a generous statement¹⁹ in favor of the violent BLM movement, decrying “systemic racism” in America and targeting resources “particularly [to] those who are Black, indigenous, people of color (BIPOC).” No wonder ERAU seeks to ban an opposing viewpoint now—they have put the force of their dollars behind leftist messaging. And a far cry from suppression, ERAU affirmatively “thanked”²⁰ BLM activists for their expression:

¹⁶ Paul, Pamela, ‘Antiracism’ Was Never the Right Answer, The New York Times, Oct. 5, 2023, <https://www.nytimes.com/2023/10/05/opinion/ibram-x-kendi-racism.html#:~:text=%E2%80%9CThe%20only%20remedy%20to%20racist,goal:%20hiring%20quotas%20are%20another.>

¹⁷ *Students for Fair Admissions, Inc. v. President & Fellows of Harv. Coll.*, 600 U.S. 181, 206 (2023).

¹⁸ <https://news.erau.edu/headlines/combating-racism-in-stem>

¹⁹ <https://news.erau.edu/headlines/with-police-brutality-and-racism-in-the-headlines-embry-riddle-offers-support>

²⁰ <https://news.erau.edu/headlines/a-special-thank-you-for-a-peaceful-protest>



A Special Thank You for a Peaceful Protest



Embry-Riddle students staged a peaceful protest against racial injustice. Artwork by Nikkoles Smith, depicting people of color who have lost their lives as a result of racism, was used with the artist's permission. (Photo: Embry-Riddle/Paige Wilson)

Jun 15, 2020, 2:37 PM

Share:

- ERAU also considers “news” the facts that it recently expended considerable time and money on a “New Embry-Riddle Study [That] Explores Gender and Ethnic Biases in Aviation.” This study “[used] social role theory to predict how gender and ethnicity of aviation job candidates affects perceived job classifications.”²¹ An ERAU professor opined that “Understanding the impact of unconscious biases will be essential to bolstering the aviation workforce.” This report was “by institutional and/or departmental sources” and required, as evidenced by its methodology, enormous time expenditures. ERAU concluded this study with a cry for more research of this type: “These observations underscore the disconcerting endurance of systemic biases within society's perceptions of aviation professionals, necessitating further attention and action.” Clearly, ERAU intends to continue its promotion of race-based publications, yet Benjamin is not allowed to publish a poster with the simple question “What is Racism?”

These examples are just the tip of the iceberg. The excuses ERAU officials have made to Benjamin are just that: excuses. ERAU is fine with supporting discussions on racism, but only if those discussions fit their narrative. This is intolerable under federal law.

These facts show that ERAU officials are discriminating on the basis of race by unequally determining which individuals can and cannot speak about racism. ERAU officials have decided that Benjamin, who is a conservative white man, may not say the word “racism,” and Lt. Col. West, who is a conservative black man, also cannot say the word “racism.” The facts show, therefore, that ERAU officials permit only those speakers who identify, in their perspective, with acceptable racialism. Because ERAU officials use race as the basis for discriminating among speakers, these facts are sufficient to state a Title VI claim.

²¹ <https://www.sciencedirect.com/science/article/pii/S0160791X24000290>



Conclusion

Secretary of War Pete Hegseth recently committed to remove “social justice, politically correct, and toxic ideological garbage that had infected” the War Department.²² It would be a shame if the Secretary’s goals were undermined by continued radical indoctrination of potential up-and-coming military leaders. The same toxic garbage must be removed from institutions like ERAU.

Yet, this complaint is not aimed at undermining the free speech rights of leftists on campus, but at stopping discrimination and suppression so that free, critical thinkers might thrive. YAF and the other complainants are, to put it simply, sick of ERAU’s antics. As Benjamin put it,

This pattern of censorship and hostility toward our club has become routine. It’s extremely disheartening to face this level of discrimination at a university once considered prestigious. The administration insists they are not censoring us, yet they dictate exactly what we can and cannot say — which is, by definition, censorship.

With the Chloe Cole event, ERAU oppressors reversed course immediately after YAF filed its first civil rights complaint. As Benjamin said, “[l]ess than a week after filing our complaint, ERAU mysteriously changed its mind and approved Chloe Cole to speak on campus.”²³ Sadly, it appears ERAU officials have no desire to do the right thing unless they find themselves in the crosshairs of a federal investigation. Thus, YAF regretfully files this second complaint and urges your office to correct ERAU officials’ discrimination. Because ERAU officials rebounded to censorship so quickly after the first complaint, your office should prioritize investigation of this matter.

Sincerely,

Madison Hahn
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²² <https://www.war.gov/News/Transcripts/Transcript/Article/4318689/secretary-of-war-pete-hegseth-addresses-general-and-flag-officers-at-quantico-v/#:~:text=toxic%20ideological%20garbage%20that%20had%20infected%20our,identity%20months%2C%20DEI%20offices%2C%20dudes%20in%20dresses>

²³ Johnston, Jeff, *Young America’s Foundation Wins Free Speech Victory at Aeronautics University*, Daily Citizen, Feb 28, 2025, <https://dailycitizen.focusonthefamily.com/young-americas-foundation-wins-free-speech-victory-at-aeronautics-university/>



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Exhibit: Contract between Young America's Foundation and ERAU