

February 11, 2025

Via Electronic Mail: OCR@ed.gov

Washington DC (Metro)
Office for Civil Rights
U.S. Department of Education
550 12th St.
Washington, D.C. 20202

DISCRIMINATION COMPLAINT

This complaint is being submitted to the United States Department of Education, Office for Civil Rights (OCR).

Information Required by OCR Discrimination Complaint Form:

1. This complaint is being filed by:

Ms. Olivia Krolczyk
The Riley Gaines Center at The Leadership Institute
oliviakrolczyk@gmail.com

2. Name of person discriminated against:

Ms. Olivia Krolczyk

3. Agency that engaged in the alleged discrimination:

University of Washington
1410 NE Campus Parkway
Seattle, WA 98195

4. The basis of this complaint is discrimination based on sex that violates Title IX of the Education Amendments of 1972 as amended, 20 U.S.C. §§ 1681 et seq., 34 C.F.R. Part 106. The illegal discrimination includes the University of Washington's (UW) failure to take reasonable and necessary measures to address the hostile environment that Ms. Krolczyk experienced while present as an invited guest at UW and the deliberate indifference the UW leadership and administration showed leading up to and since the incident occurred.

5. A description of the discriminatory acts complete with dates, names of individuals involved, and our belief as to why the discrimination was based on gender is detailed below in our complaint.

6. Yes, Ms. Krolczyk has documents and information which will help the Office of Civil Rights to understand her complaint. This includes various documents, photos, videos, email communications, and other written correspondence.

7. January 21, 2025.

8. Ms. Krolczyk is not requesting a waiver of the 180 day-day time frame for filing this complaint.

9. No, this complaint is the first time that Ms. Krolczyk has exercised her right to file a complaint about the discrimination she experienced at the hands of a violent mob of protesters at UW on January 21, 2025.

10. This complaint is not being filed with any other agency at this time.

11. Lawyer: N/A.

12. Alternate contact person: N/A.

13. Option to Participate in OCR's Early Mediation Process: N/A.

14. **Remedy sought:** Ms. Krolczyk would like the U.S. Department of Education OCR to investigate the hostile environment and discrimination that she was a victim of at UW on January 21, 2025 and the University administration's deliberate indifference to the matter.

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I. INTRODUCTION

On January 21, 2025, the student chapter of Turning Point USA (TPUSA) at the University of Washington (UW) hosted an on-campus event entitled, "Protect Women From Men: The Threat of the Trans Agenda." The event took place in Thomson Hall and was scheduled for 6:00pm to 8:00pm.

The featured speaker for this event was complainant, Ms. Olivia Krolczyk, an Ambassador at The Riley Gaines Center at The Leadership Institute and frequently sought after speaker on college campuses regarding women's rights issues. Ms. Krolczyk is a passionate advocate for free speech and protecting women's identity, opportunities and safety. In her role as a Riley Gaines Center ambassador, Olivia speaks to students about the importance of speaking truth to power. Olivia has been outspoken on campuses as well as on social media.

Unfortunately, the event never happened. Roughly 200 protesters showed up at the event, broke windows, blocked the exits, pulled the fire alarms, and disrupted the event to the point where the event had to be cancelled.

The University of Washington (UW) is a public research university in Seattle, Washington. As of the 2023-2024 academic year UW has 50,097 students including both undergraduate and graduate programs.¹ On the "Explore Diversity" section of the UW website, the University states, "At the University of Washington, diversity, equity, inclusion and belonging are integral to excellence. We value and honor diverse identities, experiences, and perspectives, strive to create accessible,

¹ <https://www.washington.edu/obp/uw-data/fast-facts/fast-facts-html-only/>

welcoming, and respectful learning environments, and promote access, opportunity, and justice for all.”²

UW published a “Diversity Blueprint” which is a mission statement for the University’s commitment to diversity of all kinds. This states, “Our goal is to foster a welcoming climate that is accessible, inclusive, and equitable.”³

Representatives from the associated student groups involved in the planning of the event and Ms. Krolczyk coordinated details and logistics of the event with several administrators from UW including;

- Craig L. Wilson- UW Police Department Chief of Police
- Marshall Traverse- UW Student Activities Office Associate Director
- Brendan Chang- UW Student Activities Office Activities Advisor
- Chris Jaross- Lieutenant for the UW Police Department
- Christina Coop- UW Student Activities Office Assistant Director
- Alan A. Galvez- UW Student Activities Office Senior Activities Advisor
- Alexia Symeonidou- UW Police Department Executive Administrative Assistant

Turning Point USA (TPUSA) is organized and operated exclusively for educational and charitable purposes in accordance with Section 501(c)(3), to empower informed civic and cultural engagement grounded in American exceptionalism and a positive spirit of action. Turning Point USA guides citizens

² <https://www.washington.edu/diversity/>

³ https://uw-s3-cdn.s3.us-west-2.amazonaws.com/wp-content/uploads/sites/48/2022/06/07105804/UW-Diversity-Blueprint-2022-2026_WEB_a11y.pdf

through development of knowledge, skills, values, and motivation, so they can meaningfully engage in their communities to restore traditional American values like patriotism, respect for life, liberty, family, and fiscal responsibility.⁴

TPUSA also has student chapters at colleges and universities throughout the country including a registered student chapter at UW. The group at UW, “seeks to educate students on freedom, history of the US in the world and the importance of individualism in the culture.”⁵ The chapter engages in educational activities throughout the year and frequently works with campus administration to invite guest speakers to campus.

The Leadership Institute is a 501(c)(3) non-profit organization whose mission is to "increase the number and effectiveness of conservative activists" and to "identify, train, recruit and place conservatives in politics, government, and media."⁶

The Riley Gaines Center at The Leadership Institute is a project featuring Riley Gaines who is a former championship swimmer from the University of Kentucky who was forced to compete against a man at the NCAA women's championship.⁷ The Center aims to build a movement of students, athletes, and other concerned citizens who are, “fed up with the attack on our freedoms and rights – and who dare to defy the dangerous gender ideology that’s spreading

⁴ <https://www.tpusa.com/about>

⁵ <https://www.instagram.com/tpusa.uw/?hl=en>

⁶ <https://leadershipinstitute.org/about/>

⁷ <https://rileygainescenter.org/>

rampant and unchecked throughout society.”⁸ The Center has built a team of Ambassadors, including Ms. Krolczyk, who have had similar experiences to that of Riley Gaines and travel the country to “speak out for women, common sense, and basic truth.”⁹

In submitting this complaint Ms. Krolczyk would like the U.S. Department of Education OCR to investigate the gender based hostile environment and discrimination that she was a victim of due at UW on January 21, 2025 and the University administration’s deliberate indifference to the matter.

II. SUMMARY OF SUBJECT MATTER JURISDICTION

Ms. Krolczyk alleges sex-based discrimination at UW in this complaint.

Ms. Krolczyk is a woman, and she is alleging discrimination by UW students and officials. The relevant statutory authority is Title IX of the Education Amendments of 1972 as amended, 20 U.S.C. §§ 1681 et seq., 34 C.F.R. Part 106.

OCR has jurisdiction to investigate allegations that involve individuals who allege discrimination based on sex in a recipient’s education program.

UW is a recipient. Ms. Krolczyk was an invited guest to UW by a recognized student organization. Ms. Krolczyk makes these allegations against UW based on her experience and inability to properly engage in and express her views during the event for which she was invited to campus.

⁸ Id.

⁹ <https://rileygainescenter.org/ambassadors/>

Therefore, OCR has subject matter jurisdiction over this matter.

III. SUMMARY OF PERSONAL JURISDICTION

OCR has personal jurisdiction over UW under Title IX because UW receives federal financial assistance from the Department of Education.¹⁰ UW is therefore a “recipient” for purposes of this complaint.

IV. SUMMARY OF MS. KROLCZYK’S STORY

A. Ms. Krolczyk’s background and the origins of the January 21, 2025 event

Ms. Olivia Krolczyk is a nationally sought after advocate for women’s rights, particularly in athletics. Ms. Krolczyk was formerly a student at the University of Cincinnati who was permanently banned from the social media app Tik-Tok due to her sharing an experience she had at the university which garnered her 6 million views. Ms. Krolczyk simply used the term, “biological woman” during a project proposal while in college and shared her experience on the social media platform. Due to her use of the term “biological woman”, Ms. Krolczyk was

This experience and treatment led Ms. Krolczyk to her work with the Riley Gaines Center where she speaks to students about the importance of speaking truth to power. As a former standout athlete, she can relate to the experiences of many

¹⁰ <https://fsapartners.ed.gov/sites/default/files/2023-04/2324FedSchoolCodeListQ3.pdf>

college women, the integrity of women's sports, and can speak of the importance of equal opportunity for female athletes across the country.¹¹

In or around December 2024, Ms. Krolczyk sent a message to several TPUSA chapters across the country with an offer to come to their campuses and share her story. The UW TPUSA chapter accepted Ms. Krolczyk's offer in December 2024 and invited Ms. Krolczyk for a January 21, 2025 event on campus.

The invitation followed a formal speaker request via the Riley Gaines Center, with the topic of Ms. Krolczyk's speech focused on the importance of protecting women's rights in spaces such as sports and locker rooms, specifically advocating against the inclusion of males in these areas. The event was intended to be an opportunity for Ms. Krolczyk to share her views on the rights of women to have safe, single-sex spaces that are not compromised by the inclusion of biological males.

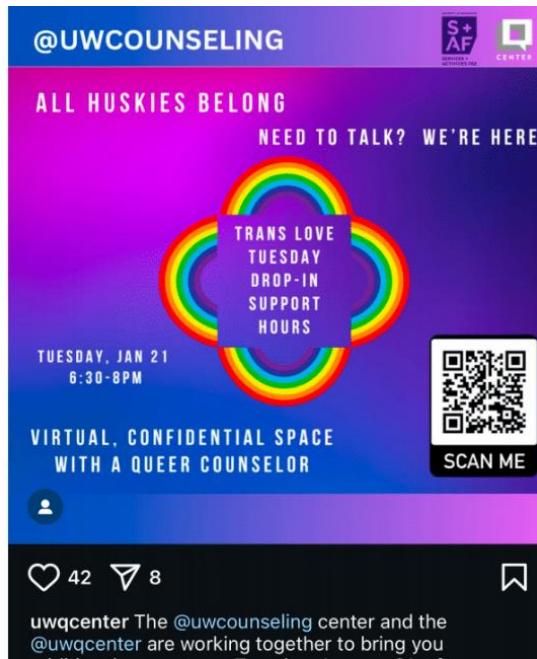
Shortly after sending the invitation to Ms. Krolczyk, the UW TPUSA chapter contacted her to confirm the event's promotional title. They agreed on, "Protect Women from Men - The Threat of Trans Agenda," which accurately reflected Ms. Krolczyk's past advocacy and her desired message of the upcoming event.

B. Details of the incident related to the "Protect Women From Men: The Threat of the Trans Agenda" event held at UW on January 21, 2025 and the lead up to it.

Beginning on January 18th, 2025, Ms. Krolczyk began to experience targeted discrimination due to her identity as a woman and her views on protecting women's

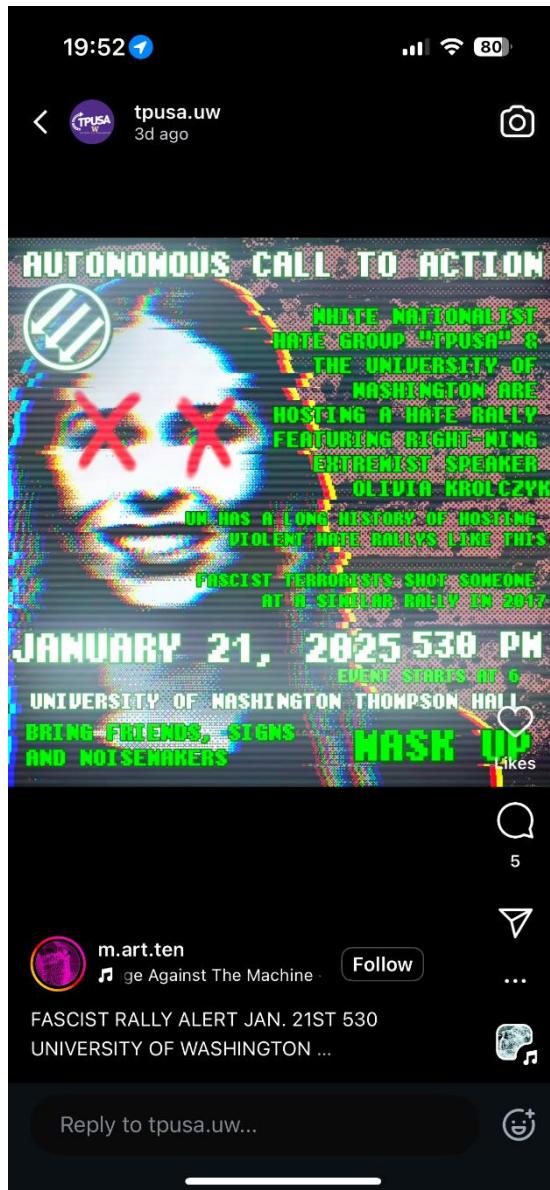
¹¹ <https://rileygainescenter.org/ambassadors/olivia/>

spaces. The University of Washington's official “uwqcenter” Instagram account, dedicated to advocacy surrounding gender and sexuality, posted public notices offering counseling services to students, due to what they labeled as a “transphobic” speaker—referring to Ms. Krolczyk:



These actions set the stage for the hostile environment that followed.

In addition, Ms. Krolczyk became aware of posters circulating on campus and social media calling for protests against the “Protect Women From Men: The Threat of the Trans Agenda” event (the event). These posters, which included Ms. Krolczyk’s photo with red X marks across her eyes:



The poster also labeled the event as a “white nationalist hate group” event.

The flyers encouraged students to “bring friends, signs, noise makers, and [to] mask up,” and to protest the event. Ms. Krolczyk immediately notified the Riley Gaines Center event coordinator about these flyers and expressed concern for both her safety and the safety of the UW students attending the event. In response, security was arranged for the event.

The day of the event, January 21, 2025, Ms. Krolczyk arrived in Seattle and was greeted by Leadership Institute Regional Coordinator, Angel Venegas, who escorted her to her hotel. After a brief meeting with UW TPUSA members, Ms. Krolczyk went to campus to engage with students prior to the event. At approximately 5:00pm, Ms. Krolczyk traveled to Thomson Hall, where the event was being held.

At approximately 5:30p.m, Ms. Krolczyk was met by a small group of protesters.

At approximately 5:45 p.m., as the event starting time approached, the protest grew to a crowd of approximately 200 students. Many ANTIFA protesters were also present. The ANTIFA protesters began to engage in coordinated protests outside the event space, complete with music, signs, and chants.

At approximately 5:50 p.m., as the event doors opened, the situation escalated quickly. Protesters pulled the fire alarms, and the protest turned hostile and violent. Ms. Krolczyk immediately felt unsafe and unwelcome.

As the event started, the protestors' actions became increasingly aggressive. Police officers were stationed at each door, as protesters began banging on the doors, shouting insults, and calling Ms. Krolczyk names such as “Nazi” and “fascist.” Ms. Krolczyk felt trapped. She was being held hostage in the room, with no safe way to exit due to the violent actions of the protesters. The police suggested that she end the event for safety reasons, though she insisted on waiting for the protest to calm so that she could give her speech. Unfortunately, the violence only

escalated. Protesters broke windows, threw various objects into the room, and released balloons filled with helium and noisemakers into the room, further disrupting the event.¹² ¹³

The continued disruption of the event, coupled with the violent tactics used by protesters, left Ms. Krolczyk feeling that her ability to speak freely as a woman was being silenced.

At approximately 6:30 p.m., after the police determined that the event could no longer continue, Ms. Krolczyk was instructed by police officers to dress in a police uniform they provided in order to disguise herself. The officers then escorted Ms. Krolczyk to a nearby vehicle for her safety. The officers deemed it too dangerous for her to return to her hotel, which was located near campus, so arrangements were made to retrieve her belongings and transport her to a safer location. She was then taken to a hotel close to the Seattle Airport.

The following day, January 22, 2025, the University of Washington issued a statement regarding the event:

¹² <https://www.foxnews.com/media/trans-activists-washington-tpusa-event-pulling-fire-alarm-shattering-window>

¹³ https://www.dailuwu.com/news/uw-turning-point-usa-event-cancelled-following-counter-rallies/article_deb300a0-d87b-11ef-af6d-1f2a10c10816.html

The University of Washington is committed to free exchange of ideas and the principles of academic freedom, in accordance with the First Amendment of the U.S. Constitution, including some whose views may be considered controversial.

JW police leadership was in conversation with organizers of Tuesday night's event several weeks ago to discuss plans to make it run as smoothly as possible and safely. The student group that invited the speaker, unfortunately, changed its plans during the course of the day. The group committed to requiring registration by attendees in advance of the event and did not follow through on that requirement.

The responsibility for interrupting last night's event falls on those whose actions were disruptive and damaging, including breaking a window, graffiti in the building and wasting firefighters' time with a false fire alarm. Anyone who is identified to have been responsible for vandalism or property damage will be pursued through legal channels.

The event organizers made the decision to suspend the event. UWPD escorted event participants out of the building.

Informed discussion and debate are encouraged on our campus, however, it is clear that presenters and disruptors are, in some cases, seeking to antagonize one another in ways that provide dramatic content for their social media feeds. Tuesday's scheduled speaker told the student newspaper that she was "excited" the event was shut down.

Again, those seeking to disrupt and shut down speakers are ultimately responsible and will face legal and disciplinary action if they are identified. It is also important for organizers to follow advice provided by UWPD regarding security if the true intention is to hold an event without disruption. The costs to the University, the state and taxpayers to allow our campus to serve as the backdrop for these disruptions and exchanges is significant, and we will continue to do everything we can to enable student groups to host events without disruption.

The statement falsely that Ms. Krolczyk had been attempting to "antagonize" UW students and "provide dramatic content for social media." These statements were not only inaccurate but deeply insulting to her. They belittled Ms. Krolczyk's intent to have a peaceful and meaningful conversation about women's rights. The University's comments implied that Ms. Krolczyk was somehow to blame for the violence and disruption, instead of condemning the actions of those who actively engaged in a hostile environment to Ms. Krolczyk.

This experience has left Ms. Krolczyk deeply disheartened and frustrated. Ms. Krolczyk is also fearful that if she continues to speak out as an advocate for women's rights that she will continue to be targeted in this manner.

V. MS. KROLCZYK'S ALLEGATIONS

Ms. Krolczyk was a victim of sex-based discrimination which resulted in a hostile environment while she was present at UW. This discrimination created an intimidating and offensive environment which caused Ms. Krolczyk to be fearful and denied her the ability to participate in a program being administered by UW, a recipient of federal funds subject to Title IX regulations.

Title IX of the Education Amendments of 1972 prohibits sex-based discrimination in education programs and activities. A hostile environment is a situation where sex-based conduct is so severe or pervasive that it limits or denies a person's ability to participate in a recipient's educational program.¹⁴ This is exactly what occurred here.

Further, the mental and emotional harm experienced by Ms. Krolczyk could have been prevented by engaged UW administrators and law enforcement officials. Sadly, these officials were deliberately indifferent to the needs of their students and Ms. Krolczyk.

Both the administration and law enforcement officials had proper notice of the event and of the planned protests in response to it. Steps could have been taken

¹⁴ <https://www.ed.gov/laws-and-policy/civil-rights-laws/sex-discrimination>Title-IX-and-Sex-Discrimination#:~:text=Scope%20of%20Title%20IX&text=A%20recipient%20institution%20that%20receives.sexual%20orientation%20and%20gender%20identity>.

to secure both the venue and Ms. Krolczyk's safety. Instead, Ms. Krolczyk faced a hostile environment where she feared for her emotional and physical safety due to the deliberate indifference of the UW administration and law enforcement officials.

VI. CONCLUSION AND DESIRED OUTCOME OF COMPLAINT

Ms. Olivia Krolczyk was the victim of gender-based discrimination, a hostile environment, and the deliberate indifference of officials and law enforcement at the University of Washington on January 21, 2025 while intending to speak as an invited guest to a University sanctioned event entitled, "Protect Women From Men: The Threat of the Trans Agenda". Given the goals outlined by the new administration of President Donald J. Trump, this investigation should be of paramount importance in protecting women from those who seek to promote harmful gender-based ideology in our nation's colleges and universities.

Further, initiating an investigation in this situation will further the goals laid out in President Donald J. Trump's January 20th, 2025 Executive Order, "Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government." Specifically, in this order the President states, "Federal funds shall not be used to promote gender ideology. Each agency shall assess grant conditions and grantee preferences and ensure grant funds do not promote gender ideology."

Ms. Krolczyk's desired outcome of this complaint is for the U.S. Department of Education OCR to investigate these allegations and the facts and circumstances that led to them.