



**U.S. Department of Justice**

**Civil Rights Division**

*Office of the Assistant Attorney General*

*950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530*

August 12, 2025

**Via Electronic Mail Only**

Ellen M. Granberg, Ph.D. – President  
THE GEORGE WASHINGTON UNIVERSITY  
c/o Charles Barber, Vice President and General Counsel  
2000 Pennsylvania Ave, NW  
Washington, DC 20006

**Re: Notice of Findings**

Dear President Granberg:

We write to inform you that the United States Department of Justice has concluded its investigation into the George Washington University's ("GWU") response to incidents of antisemitic discrimination and harassment of Jewish and Israeli students. The Department finds that despite actual notice of the abuses occurring on its campus, GWU was deliberately indifferent to the complaints it received, the misconduct that occurred, and the harms that were suffered by its students and faculty, in violation of Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. As set forth below, the Department hereby offers GWU the opportunity to resolve this matter through a voluntary resolution agreement.

The Department enforces federal civil rights laws that protect students from discrimination, including Title VI, which prohibits antisemitic discrimination, harassment, and abuse by recipients of federal financial assistance. The Department provides direct federal financial assistance to GWU.

A school may be liable for intentional discrimination under Title VI if it has been "deliberately indifferent" to known acts of harassment that give rise to a hostile educational environment." *Stafford v. George Washington University*, 578 F.Supp.3d 25, 35-36 (2002), *reversed on other grounds*, 56 F.4th 50 (D.C. Cir. 2022); *see also Zeno v. Pine Plains Cent. Sch. Dist.*, 702 F.3d 655, 666 (2d Cir. 2012) ("A finding of deliberate indifference depends on the adequacy of a school district's response to the harassment.") (Title VI claim for race-based harassment).

To establish a hostile educational environment, a school must "(1) [have] had actual knowledge of, and (2) was deliberately indifferent to (3) harassment that was so severe, pervasive,

and objectively offensive that it (4) deprived the victim of access to the educational benefits or opportunities provided by the school.” *Stafford*, 578 F.Supp.3d at 36 (quoting *Bryant v. Indep. Sch. Dist. No. 1-38 of Garvin Cnty, Okl.*, 334 F.3d 928, 934 (10th Cir. 2003)). “Whether a hostile educational environment exists is a question of fact, determined with reference to the totality of the circumstances . . . .” *Monteiro v. Tempe Union High Sch. Dist.*, 158 F.3d 1022, 1034 (9th Cir. 1998).

Courts have found that when students are routinely subjected to antisemitic epithets, threats of violence, or physical assault by their peers, such harassment is sufficiently severe, pervasive, and objectively offensive to create a hostile environment. For example, one court found “severe and discriminatory harassment” where plaintiffs “had anti-Semitic slurs repeatedly directed at them, witnessed swastika graffiti, and were subjected to anti-Semitic ‘jokes.’ [Plaintiffs] were also called ‘crispy’ or told that they should have been burned in the Holocaust. In addition, [Plaintiffs] claim to have suffered physical harassment, including being slapped, physically restrained, and having coins thrown at them.” *T.E. v. Pine Bush Cent. Sch. Dist.*, 58 F. Supp. 3d 332, 357 (S.D.N.Y. 2014). Another court found that a hostile environment was sufficiently alleged where “students were giving Nazi salutes, saying ‘Heil Hitler,’ wearing swastikas, and referencing gas chambers used to kill Jews during the Holocaust.” *I.G. v. Jefferson Cnty. Sch. Dist. through Bd. of Educ.*, 452 F. Supp. 3d 989, 1002 (D. Colo. 2020); *see also Gartenberg v. Cooper Union for the Advancement of Sci. & Art*, 765 F. Supp. 3d 245, at 272-73 (S.D.N.Y. 2025) (finding “physically threatening or humiliating conduct that the Complaint alleges Jewish students in the library experienced is entirely outside the ambit of the free speech clause and was objectively severe”) (internal quotation marks and citation omitted); *Kestenbaum v. President & Fellows of Harvard Coll.*, 743 F. Supp. 3d 297, 304 (D. Mass. 2024) (finding a plausibly hostile environment based on, *inter alia*, “[d]uring one of the protest rallies, demonstrators blockaded Jewish students in a study room, and during another, protestors ‘surrounded and intimidated’ Jewish students”) (internal citations omitted).

Finally, Title VI requires that when a school is made aware of alleged harassment, it must respond reasonably by taking timely and appropriate action to investigate or otherwise determine what occurred. If an investigation reveals that discriminatory harassment has occurred, the school must act reasonably to investigate and address the harassment and hostile environment. *See, e.g., Flores v. Morgan Hill Unified Sch. Dist.*, 324 F.3d 1130, 1135 (9th Cir. 2003) (failure to investigate, stop harassment, or discipline all students who engaged in harassment was evidence of deliberate indifference); *see also G.D.S. v. Northport-East Northport Union Free Sch. Dist.*, 915 F. Supp. 2d 268, 279 (E.D.N.Y. 2012) (“Given the severe and shockingly offensive nature of the anti-Semitic slurs allegedly being made to the Plaintiff by other students, it appears to this Court that the supposed lack of action by the Defendants to either educate students about the harms of such religious discrimination or investigate and discipline the harassers was an inadequate response and thus, clearly unreasonable.”). Furthermore, “[w]here a school district has actual knowledge that its efforts to remediate are ineffective, and it continues to use those same methods to no avail, such district has failed to act reasonably in light of the known circumstances.” *Vance v. Spencer Cnty. Pub. Sch. Dist.*, 231 F.3d 253, 261 (6th Cir. 2000) (Title IX); *see also Flores*, 324 F.3d at 1135-36 (citing *Vance*, 231 F.3d at 261).

The Department finds that GWU students and faculty were subjected to a hostile educational environment that was objectively offensive, severe, and pervasive. The antisemitic,

hate-based misconduct by GWU students directed at Jewish GWU students, faculty, and employees was, in a word, shocking. The behavior was demonstrably abhorrent, immoral, and, most importantly, illegal.

By way of example, from approximately April 25, 2024, well into May 2024, during final examinations and graduation ceremonies, members of the GWU community engaged in antisemitic, disruptive protests that included the establishment of an “encampment” in GWU’s University Yard, which lies at the center of the GWU educational environment. The purpose of the agitators’ efforts was to frighten, intimidate, and deny Jewish, Israeli, and American-Israeli students free and unfettered access to GWU’s educational environment. This is the definition of hostility and a “hostile environment.” The Department’s investigation found numerous incidents of Jewish students being harassed, abused, intimidated and assaulted by protesters. To be clear, Jewish students were afraid to attend class, to be observed, or, worse, to be “caught” and perhaps physically beaten on GWU’s campus.

One Jewish GWU student described being surrounded, harassed, threatened, and then *ordered to leave the area immediately* by antisemitic protesters after exiting the Law School, which is adjacent to University Yard. GWU’s Assistant Dean of Students instructed the Jewish student to leave because his presence was “antagonizing and provoking the crowd.” Other Jewish students provided similar accounts of harassment and intimidation by protesters when they tried to cross the campus through University Yard. Protesters surrounded them, yelled antisemitic slurs in their faces, and forced them to flee. A Jewish student who quietly held up an Israeli flag on University Yard was confronted and surrounded by protesters with their arms linked together for the purpose of restricting the Jewish student’s movements. Throughout the encounter, the protesters shouted racial slurs. A GWU Police Department officer standing nearby did nothing to prevent or intervene in the incident and instead told the student to leave University Yard for his own safety. Another Jewish student standing across the street from the encampment holding an Israeli flag was harassed by protesters who screamed “Fuck you, Zionist go die,” “there is only one solution, Intifada revolution, “ Hamas are freedom fighters,” and “Zionists go to hell!” That Jewish student was also told to leave the area by a GWU PD officer.

Jewish students, parents and alumni contacted GWU numerous times to express their alarm and concern about the actions of protesters and to express their legitimate and reasonable fears for their safety. Just between April 25 and May 1, 2024, GWU received no less than eight complaints alleging that demonstrators were discriminating against students because they were Jewish or Israeli. The Department has also received other complaints from Jewish GWU students and their parents about antisemitic misconduct and abuse.

Based on its investigation, the Department has concluded that GWU took no meaningful action and instead was deliberately indifferent to the hostile educational environment on its campus in violation of Title VI.

Having determined that GWU was deliberately indifferent to the hostile educational environment for Jewish, American-Israeli, and Israeli students, the Department intends to proceed with enforcement of this important federal civil rights law unless resolution of this matter is reached in the near future. The Department therefore offers GWU the opportunity to enter into a voluntary resolution agreement to ensure immediate remediation of these issues and related

reforms to prevent the recurrence of discrimination, harassment, and abuse. Please contact Deputy Assistant Attorney General Gregory Brown at 202-514-7818 or Gregory.Brown2@usdoj.gov by Friday, August 22, 2025, to indicate whether GWU has interest in such a dialogue.

We look forward to your response.

Regards,



HARMEET K. DHILLON  
Assistant Attorney General  
Civil Rights Division