



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

950 Pennsylvania Avenue, NW - RPK  
Washington, DC 20530

September 30, 2025

**Via Electronic Mail Only**

Dr. Chris Heavey  
Interim President  
University of Nevada Las Vegas  
4505 S. Maryland Pkwy., Box 451002  
Las Vegas, NV 89154  
[chris.heavey@unlv.edu](mailto:chris.heavey@unlv.edu)

Attn:

Elda Luna Sidhu  
Vice President and General Counsel  
University of Nevada Las Vegas  
[elda.sidhu@unlv.edu](mailto:elda.sidhu@unlv.edu)

**Re: U.S. Department of Justice Investigation of Harassment Allegations at the University of Nevada Las Vegas**

Dear Dr. Heavey:

We write to notify you that the U.S. Department of Justice (the Department), through the Educational Opportunities Section of the Civil Rights Division, has opened an investigation into complaints and other information it has received concerning the University of Nevada Las Vegas's (UNLV) response to allegations of discrimination against students on the bases of race, religion, and national origin.

The Department enforces federal civil rights laws that protect students from discrimination, including Title IV of the Civil Rights Act of 1964 (Title IV), 42 U.S.C. §§ 2000c *et seq.*, which authorizes the Department to address certain equal protection violations in public colleges based on, among other bases, race, religion and national origin, and Title VI of the Civil Rights Act (Title VI), 42 U.S.C. §§ 2000d, which prohibits discrimination based on, among other bases, national origin and race by recipients of federal financial assistance.<sup>1</sup>

In conducting the compliance investigation, we will seek to determine whether UNLV is violating Title IV and Title VI. We have not reached any conclusions about the subject matter of

<sup>1</sup> The Department currently provides direct federal financial assistance to UNLV in the amount of \$1.83 million.

the investigation. If we conclude that UNLV is not violating Title IV and/or Title VI, we will notify you that we are closing the investigation. 28 C.F.R. § 42.107. If we conclude that UNLV is violating Title IV and/or Title VI, we will inform you and work with you to secure compliance by informal voluntary means. 28 C.F.R. §§ 42.107 & 42.108. If we cannot secure compliance by voluntary means, we may take formal action to secure compliance, which could include suspending, terminating, or refusing to grant or continue your federal financial assistance, as well as commencing a civil action. 28 C.F.R. § 42.108.

We expect UNLV to cooperate fully with this compliance investigation. The Department's Title VI implementing regulations require, among other obligations, that recipients of federal financial assistance permit access by the Department to sources of information and facilities as may be pertinent to ascertain compliance with Title VI and the implementing regulations. 28 C.F.R. §§ 42.106 & 42.108. These Title VI implementing regulations also require that every application for federal financial assistance be accompanied by an assurance that the program will be conducted in compliance with all requirements that Title VI and the implementing regulations impose. 28 C.F.R. § 42.105(a)(1). Pursuant to this requirement, UNLV signed contractual assurances agreeing to permit the Department to examine records and access other sources of information and facilities.

To permit the Department to make a full assessment, we request that UNLV provide information and documents to facilitate our evaluation of UNLV's compliance with Titles IV and VI, and to inform the Department's determination of what further action, if any, it will take.

We ask that you respond to the enclosed Initial Request for Information (RFI) by November 1, 2025. Responsive documents maintained in electronic format (including, but not limited to, word processing files, PDF files, Microsoft Excel spreadsheets, databases, and emails) should be produced in their native electronic format with metadata, if applicable. Note that all productions must be conveyed through our secure file sharing platform, Justice Enterprise File Sharing (JEFS).<sup>2</sup>

We recognize that some of the requested materials may contain student information protected under the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g. Please be advised that the Department is authorized under 34 C.F.R. § 99.31(a)(3)(ii) to obtain such information without prior consent for the purpose of enforcing federal legal requirements, including Title VI. Any information disclosed pursuant to this request will be used solely for compliance review purposes and maintained in accordance with applicable federal confidentiality requirements.

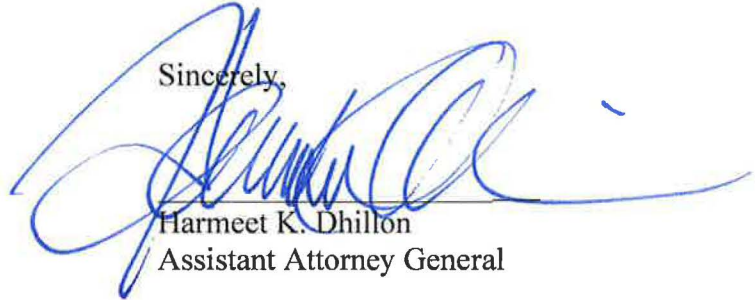
Additionally, with this notice, UNLV is under an ongoing obligation to preserve all records that may be relevant to this investigation, including electronic documents and emails, and UNLV should take steps to stop any record deletion by any individuals who may have information relevant to this investigation at UNLV.

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<sup>2</sup> Department counsel will coordinate with UNLV's counsel about accessing JEFS.

Do not hesitate to contact Joshua Zuckerman, [Joshua.Zuckerman@usdoj.gov](mailto:Joshua.Zuckerman@usdoj.gov) with any questions about this notice and enclosed RFI. Thank you in advance for your assistance with this matter.

Sincerely,



Harmeet K. Dhillon  
Assistant Attorney General



Sigal Chattah  
Acting United States Attorney

Enclosure

## **INITIAL REQUEST FOR INFORMATION**

The following requests are for information from UNLV. Unless otherwise indicated, the information below is requested for the 2023-24 academic year to the present. Whenever possible, requests for lists or spreadsheets of data should be provided in a sortable, searchable electronic format (e.g., Microsoft Excel spreadsheet), and should be provided for each academic year. If a document is responsive to several requests, produce that document once and, in UNLV's subsequent responses, indicate that it has already been produced and identify the relevant response. Wherever requested, "documents" include, but are not limited to, all information contained in databases, computer systems, computers, and/or mobile data devices, as well as all memoranda, meeting minutes, policies, technical standards, reports, transcripts, school records, emails, and handwritten and other notes.

1. A description of UNLV's office(s) responsible for responding to allegations of discrimination against students, including harassment or retaliation, based on religion or national origin, including the name, contact information, and a description of duties and responsibilities of all staff members tasked with responding to such allegations. Describe any changes made to those offices or their duties and responsibilities since October 7, 2023 (10/7 or post-10/7), if any. Additionally, include a narrative description of how each office initially responds to new discrimination reports and complaints and include any standardized language that is sent to each complainant, including invitations to conduct intake interviews.
2. A description of UNLV's offices or components responsible for UNLV's response to the events following 10/7, including those offices and components responsible for overseeing issues related to free speech, protest, and security. Illustrate or describe these offices' and components' reporting relationships at UNLV.
3. A description of UNLV's response to protests and encampments following 10/7. In addition, include a narrative description of each encampment event, if any, and identify all actions taken by UNLV to respond to any encampment.
4. All student and employee codes of conduct, handbooks, protocols, policies, directives, or communications, both formal and informal, related to:
  - a. Hosting speech, debate, film screening, performance, or other public events; and
  - b. Permissions, limitations, restrictions, or bans related to the public display of posters, flags, stickers, paraphernalia, or other media.
5. A spreadsheet (e.g., Microsoft Excel) from UNLV listing all reports and complaints alleging conduct that reasonably may be considered discrimination, including harassment or retaliation,<sup>3</sup> based on actual or perceived religion or national origin. List each report and

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<sup>3</sup> This includes discrimination involving students, UNLV employees (e.g., administrators, faculty, or staff), or third parties.

complaint received; whether written, verbal, or otherwise communicated, and provide the following information:

- a. A detailed description of the alleged incident(s) and basis for the alleged discrimination;
  - b. The date, time, and location of the alleged incident(s), noting whether the location is on or off campus;
  - c. For each complainant, respondent, reporter, and witness, if known and applicable: their status (*e.g.*, student, administrator, faculty, other staff, recruit); student identification number; year in school; employee name and job title (*e.g.*, residential advisor, teaching assistant, assistant coach); and the name of any affiliated student or faculty organization;
  - d. The manner in which the report was made (*e.g.*, written complaint, telephone call, email, voicemail, other); and the recipient (by name and job title) of such report;
  - e. A description of UNLV's response to each alleged incident, including who was responsible (name, job title, department); when the response commenced and concluded; any supportive measures offered to the complainant, respondent, and/or other person and whether such measures were accessed; any finding made upon conclusion; any action taken as a result (*e.g.*, the disciplinary action and/or other actions or remedial measures taken); and whether any party appealed the findings or outcome (including the party who appealed and the date, nature, and outcome of the appeal).
6. All campuswide messages sent to students and/or employees by the President's office or any other office at UNLV regarding the events of 10/7 and discrimination, free speech, or protest policies and practices post-10/7.
7. All messages sent to the UNLV by the University of Nevada system's Board of Regents regarding the events of 10/7 and discrimination, free speech, or protest policies and practices post-10/7.
8. All nonprivileged documents produced or received by the UNLV Task Force on Jewish Identity and Inclusion relating to the events of 10/7, discrimination, harassment, antisemitism, and anti-Israel demonstrations.