



JUDICIAL BOARD

UCLA UNDERGRADUATE STUDENTS ASSOCIATION



Petitioner: Bella Brannon

v.

Respondent: Alicia Verdugo, Cultural Affairs
Commissioner



Select All That Apply:

UCLA USA Constitution Article VI, Section B, Clause I:

“The Judicial Board shall rule upon the Constitutionality of legislation and official actions of elected or appointed officials at the request of the Council or any other members of the Association.”

UCLA USA Constitution Article VI, Section B, Clause II:

“The Judicial Board may also question, comment, or rule upon other matters at the request of the Council or any member of the Association.”

UCLA USA Constitution Article VI, Section B, Clause III:

“The Judicial Board shall serve as a board of appeals to decisions of the Elections Board.”

UCLA USA Constitution Article VI, Section B, Clause IV:

“The Judicial Board shall have other powers and responsibilities as may be delegated to it by the Chancellor of the University of California Los Angeles.”

Please provide a detailed account of the alleged violation(s) along with **all** relevant provisions. Additionally, please demonstrate the direct relationship between the violation(s) in question and the action(s) of the respondent. Lastly, the Judicial Board will not consider violations not explicitly enumerated in this section, and retains discretion regarding what violations it will consider (Article I, Section IV, Clause D of the Official Rules of the Judicial Board).

The Cultural Affairs Commissioner, Alicia Verdugo, discriminated against Jewish students during the Fall application and hiring process for Cultural Affairs staff. Their behavior represents a violation of Article 1 Section E of the USAC Bylaws, as well as non-discrimination laws, including California Education Code § 220, Unruh Civil Rights Act, UCLA's Principles of Community, Section II A of the UC Policy on Discrimination and Title VI of the Civil Rights Act.

Text messages and documents sent by Verdugo detail the vetting of applicants suspected of being associated with "Zionism" and a hiring sheet revealing the rejection of Jewish students substantiate these claims. Their actions constitute clear discrimination against students on the basis of religion, violating Article 1, Section E of the Undergraduate Student Association's Bylaws, which states: "*The Council shall not support or affiliate with any organization which legally discriminates on the basis of: race, creed, sex (except as exempt from Title IX), age, national origin, religion, physical handicap, or sexual orientation.*" This policy explicitly prohibits discrimination based on religion, and Verdugo's conduct directly flouts these guidelines.

Official Commission documents stated, "We reserve the right to remove any staff member who dispels... Zionism... and any/all other hateful/bigoted ideologies" (see Appendix A). In internal messages, Verdugo explicitly instructed series heads to be aware that "a lot of Zionists were applying" and to "do your research when you look at applicants, and I will also share a doc of no-hire list during retreat." (see Appendix B).

No student applicants for the Senate mentioned Zionism or any reference to Israel in their applications. Even if they had, it should not be a basis for their disqualification. Instead, a policy was created that targeted and excluded Jewish applicants. Among all the applicants, five were rejected outright. And among those five, three indicated their Jewish identity in their applications (see Appendix H). Not a single accepted applicant mentioned Judaism, making every single openly Jewish applicant rejected. Verdugo's direct instruction to exclude Zionist applicants and the implied directive to be on the lookout for Jewish applicants, resulted in systemic discrimination against candidates who expressed any attachment to Judaism.

As a student passionate about hip-hop, I applied for a staff position with the Hip Hop Congress at the Cultural Affairs Commission. In my application, I shared my personal connection to hip-hop, my experience playing music, and my sincere interest in participating in hip-hop culture on campus. Despite my qualifications, I was rejected. Based on the texts and screenshots, I have every belief my identity as a Jewish student played a role in my rejections. Students who were aware of this directive from Verdugo have informed me confidentially that this was the clear instruction and that Verdugo took an active role in rejecting Jewish applicants.

Alicia Verdugo has consistently misused their position to discriminate against Jewish students and to promote or post messages containing vile and explicit antisemitism. Their actions constitute a clear violation of USAC's Bylaws, California Education Code § 220, which prohibits discrimination based on religion in educational institutions, and the UC's Anti-Discrimination Policy, which bars exclusion or harassment based on religious identity. Verdugo's discriminatory hiring practices, vetting applicants based on their association with "Zionism" and rejecting Jewish students, also violate the Unruh Civil Rights Act (California Civil Code § 51), ensuring equal access to opportunities, and Title VI of the Civil Rights Act of 1964, which protects individuals from discrimination rooted in shared ancestry or ethnic characteristics, such as antisemitism. Their hiring practices are merely the latest in a troubling pattern of violations.

In October 2024, Verdugo blocked me, a Jewish student, on their UCLA-affiliated Twitter account (Appendix C). Throughout the year from October 2023 until 2024 they posted many messages including those that accuse Jews and Israel of blood libel, celebrate the Hamas attacks and promote the eradication of the State of Israel. (See Appendix G) Blocking any student on social media using a UCLA-affiliated account is not only discriminatory but also raises serious legal concerns. As a public institution, UCLA is bound by the First Amendment, which prohibits viewpoint discrimination in public forums, including official social media accounts.

In 2023, Verdugo told another Jewish student, "You simply don't have the will or empathy to look inside yourself and understand that your parents are liars." (see Appendix D). By targeting a student in a public forum and making baseless claims about the character of her parents because of their religion, Verdugo violated, as an employee, [UCLA's Principles of Community](#) and [Section II A of the UC Policy on Discrimination](#).

In March 2024, Verdugo proudly shared on social media their involvement in creating a six-foot-tall pig statue that incorporated antisemitic symbolism. The statue evoked the *Judensau*, a medieval caricature portraying Jews as pigs, considered unclean in

Judaism, and featured a Star of David money box, perpetuating ancient antisemitic conspiracies linking Jews to greed and wealth. This explicitly antisemitic caricature was displayed on campus for two days. (Appendix E)

In April of 2024, Verdugo publicly participated in the encampment protest that violated numerous campus policies. In fact, their CAC tent was set up within the encampment promoting their involvement in breaking [school rules](#) including [fire code](#), "[Time, Place, and Manner](#)" policies, [blocking access to campus](#), and intimidating fellow students.(See Appendix F)


In October 2024, Verdugo barred four Jewish students from participating in an open mic event ironically named "F*ck Your Bans." One of the students had a confirmed RSVP but was denied entry. Coincidentally, she was wearing a visible Star of David necklace (see Document 2). According to UCLA's website, "the mission of the Cultural Affairs Commission is to put on quality programming with cultural, political, or social relevance that is accessible to all students." Verdugo personally excluded four Jewish students at the door, representing a violation of the Commission's own guidelines, California Education Code § 220, which prohibits discrimination based on religion in educational institutions, and the Unruh Civil Rights Act (California Civil Code § 51), which ensures equal access to public accommodations.

Please provide an account of the effects and magnitude of the alleged violation(s).

The explicit mission of the Cultural Affairs Commission is to "promote cultural opportunities on campus" and create events "that are accessible to all students."However, the actions of Cultural Affairs Commissioner Alicia Verdugo have created a hostile and exclusionary environment for Jewish students at UCLA. By systematically discriminating against Jewish applicants during the Fall hiring process and vetting all Jewish candidates based on suspected ties to "Zionism," Verdugo

effectively barred Jewish students from participation in the Cultural Affairs Commission. This deliberate exclusion violated multiple anti-discrimination laws, including California Education Code § 220, the Unruh Civil Rights Act, and Title VI of the Civil Rights Act of 1964, as well as USAC Bylaws and UCLA policies.

Beyond hiring practices, Verdugo's actions have perpetuated antisemitism on campus through official social media channels and public events, further marginalizing Jewish students. These actions include blocking Jewish individuals from UCLA-affiliated platforms, excluding Jewish students from participating in campus events, posting antisemitic rhetoric, and displaying offensive symbols on campus. The cumulative effect of these behaviors has fostered an environment of intimidation and alienation, directly impacting the safety and inclusion of Jewish students and compromising UCAC's mission to support all members of its diverse community.




Please detail your desired remedy to redress the alleged injury or injuries. Please note that the Judicial Board retains the authority to reject your remedy if considered unreasonable or unworkable. In such a situation, the Judicial Board will decide on an appropriate remedy to be included in its final verdict (Article X, Section I, Clause A of the Official Rules of the Judicial Board).

By rejecting Jewish applicants and citing Zionism as a disqualifying factor, despite the applicants never explicitly referencing Zionism or their relationship to the State of Israel in their applications, Alicia Verdugo demonstrates their conflation of Judaism with Zionism. In doing so, they have intentionally created a correlation between Jewish and Zionist identities to systematically discriminate against Jews, a correlation they imposed, even though many Jewish individuals naturally consider Zionism an intrinsic part of their identity. Every single student who identified themselves as openly Jewish was rejected by the Cultural Affairs Commission.

This repeated pattern of discriminatory behavior demonstrates that Alicia Verdugo cannot fairly represent all students. Their actions are inconsistent with the principles of equity and inclusion required of their office. We recommend their immediate removal as

Cultural Affairs Commissioner and a thorough investigation into the practices of their office.



Involved Parties

Only members of the UCLA Undergraduate Students Association are eligible to be involved as parties before the Judicial Board (Article I, Section IV, Clause E of the Official Rules of the Judicial Board). Any petition not in accordance with the aforementioned is subject to automatic denial. If a violation is discovered following the petition's acceptance, the petition will be immediately withdrawn with a default judgement against the offending party.

Petitioner: Bella Brannon

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Counsel for Petitioner: Bella Brannon

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Respondent: Alicia Verdugo

Email: culturalaffairs@usac.ucla.edu

Statement of Authenticity

By electronically signing below, I hereby attest that the above information is true to the best of my knowledge. Additionally, I understand that the falsification of any aspect of this Petition will result in its denial, or withdrawal if discovered post-approval, and a default judgement in favor of the respondent.

Respectfully submitted,



Petitioner

Bella Brannon

Date

November 25

Counsel for Petitioner

Bella Brannon

Date

November 25

For Judicial Board Use Only

Chief Justice

So Jeong (Ellen) Park

Petition No.

21-

Petition Granted

Petition Denied

Notes: