



The Louis D. Brandeis Center
for Human Rights Under Law

May 16, 2024

VIA E-MAIL

Hon. Catherine Lhamon
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**Re: Civil Rights Violations at the University of California
Santa Barbara**

Dear Assistant Secretary Lhamon and Mr. Pelchat:

This complaint is filed on behalf of Tessa Veksler, a Jewish student at the University of California Santa Barbara (“UCSB”) and the President of UCSB’s student government, and The Louis D. Brandeis Center for Human Rights Under Law (“the Brandeis Center”), a national non-profit legal advocacy organization that works to combat anti-Semitism in higher education and protect the rights of Jewish students and all students. Since the October 7 terrorist attacks in Israel, Ms. Veksler has been subjected to severe and persistent anti-Semitic bullying and harassment on campus by her peers, based on her Jewish shared ancestry and ethnicity—specifically, her connection to the Jewish State of Israel or her “Zionism,” which is integral to her Jewish identity. Students have targeted Ms. Veksler publicly and relentlessly on social media and at her student government office, proclaiming that “Zionists are not allowed” and “Zionists are not welcomed” on campus, and threatening that “you can run but you can’t hide, Tessa Veksler.” Students have vilified and demeaned Ms. Veksler as a Zionist dog, racist Zionist, and a “Ziofascist” who must “GTFO [get the fuck out],” claiming she is unfit to serve in her elected position due to her Jewish identity. Left unchecked by the University for seven months, the harassment has left Ms. Veksler fearful for her physical

safety on campus, negatively impacted her mental health, adversely affected her academic performance, and undermined her ability to effectively lead the student government. Despite its knowledge of the harassment, UCSB has failed to promptly address the harassment and eliminate the impact of the hostile climate on campus for Ms. Veksler.

For the reasons stated below, Ms. Veksler and the Brandeis Center request that the Office for Civil Rights (“OCR”) initiate an investigation of UCSB, a recipient of federal financial assistance,¹ for violations of Title VI and the statute’s implementing regulations.²

We further request mediation pursuant to Section 201(a) of OCR’s Case Processing Manual, to be followed by an investigation if mediation is not successful.

I. Statement of Facts

A. Students at UCSB have subjected Ms. Veksler to severe and persistent anti-Semitic harassment on the basis of her Jewish identity.

Following Hamas’ October 7 terrorist attacks in Israel, Ms. Veksler posted a statement on her personal Instagram account condemning the attacks and expressing her solidarity with Israel and the Jewish people.³ Soon after she posted, a group of UCSB students commenced a campaign of harassment against Ms. Veksler that targeted her on the basis of her Jewish shared ancestral identity connected to Israel.⁴

The manner in which Ms. Veksler has been targeted reflects a pattern of mistreatment that Jewish students are facing on college campuses across the country when they express aspects of their identity connected to Israel and Zionism. With increasing frequency, Jewish college and university students are being targeted due to the Jewish people’s connection to Israel. Students report being shunned, harassed, and marginalized as “Zionists.” The U.S. National Strategy to Counter Antisemitism, released in May 2023, noted that “Jewish students and educators are targeted for derision and exclusion on college campuses, often because of their real or perceived views about the State of Israel. When Jews are targeted

¹ See <https://www.ucsb.edu/higher-education-emergency-relief-fund>.

² 42 U.S.C. § 2000d *et seq.*; see also 34 CFR §§ 100.3(a), b)(1).

³ See https://www.instagram.com/p/CyLp4iBLlIK/?img_index=4.

⁴ Although the harassment against Ms. Veksler began over seven months ago, all instances of harassment documented in this Complaint occurred within the 180 day statute of limitations.

because of their beliefs or their identity, when Israel is singled out because of anti-Jewish hatred, that is antisemitism. And that is unacceptable.”⁵ According to the International Holocaust Remembrance Alliance Working Definition of Antisemitism (the “IHRA Definition”), “[h]olding Jews collectively responsible for actions of the state of Israel” is an example of anti-Semitism.⁶

Jews share more than a common faith; they are a people with a shared history and heritage deeply rooted in the land of Israel.⁷ Indeed, according to a PEW survey, eight in ten Jews say that caring about Israel is an essential or important part of what being Jewish means to them.⁸ It is not a mere viewpoint or political opinion. For most Jews, including Ms. Veksler, Zionism represents their Jewish ancestry—the historic reality that the Jews as a people originated in ancient Israel. For most Jews, including Ms. Veksler, therefore, the ancestral connection to Israel (*i.e.*, Zionism) represents an integral component of their Jewish identity.

At UCSB, students bullied and harassed Ms. Veksler online and on the physical campus on the basis of her Jewish identity connected to Israel. On or about February 25 and 26, 2024, students posted signs throughout the Multicultural Center (“MCC”), where Ms. Veksler’s student government office is located, threatening her and making it clear Ms. Veksler is unwelcome on campus and should be excluded because she is a Zionist. The messages on various posters stated: “Zionists are not welcome,” “Zionists not welcome,” and “Ziofascists GTFO [get the fuck out].” The harassment directed at Ms. Veksler was further publicized to the student body community when photographs were posted on UCSB MCC’s official Instagram account spotlighting the signage on the MCC doors that declared, “Zionists are not welcomed,” with a comment stating “in case we aren’t clear, let us spell it out.”

⁵ See The U.S. National Strategy to Counter Antisemitism (May, 25, 2023) at 9, <https://www.whitehouse.gov/wp-content/uploads/2023/05/U.S.-National-Strategy-to-Counter-Antisemitism.pdf>.

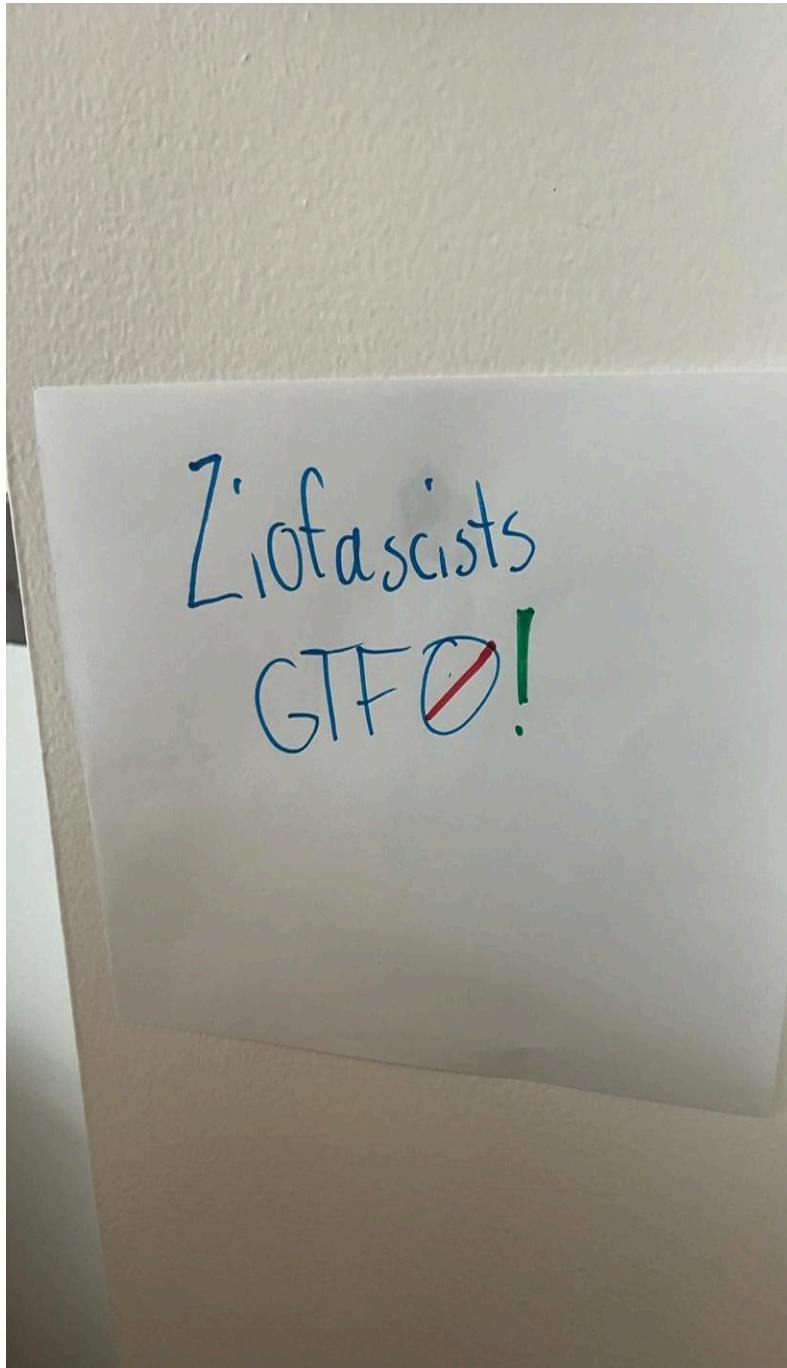
⁶ INT’L HOLOCAUST REMEMBRANCE ALLIANCE, *Working Definition of Antisemitism*, <https://www.holocaustremembrance.com/working-definition-antisemitism> (last visited Oct. 1, 2021) [hereinafter IHRA Definition].

⁷ Alyza D. Lewin, *Zionism: The Integral Component of Jewish Identity that Jews are Historically Pressured to Shed*, 26 ISRAEL AFFAIRS 330 (2020), [Zionism - The integral component of Jewish identity that Jews are historically pressured to shed: Israel Affairs: Vol 26 , No 3 - Get Access \(tandfonline.com\)](#).

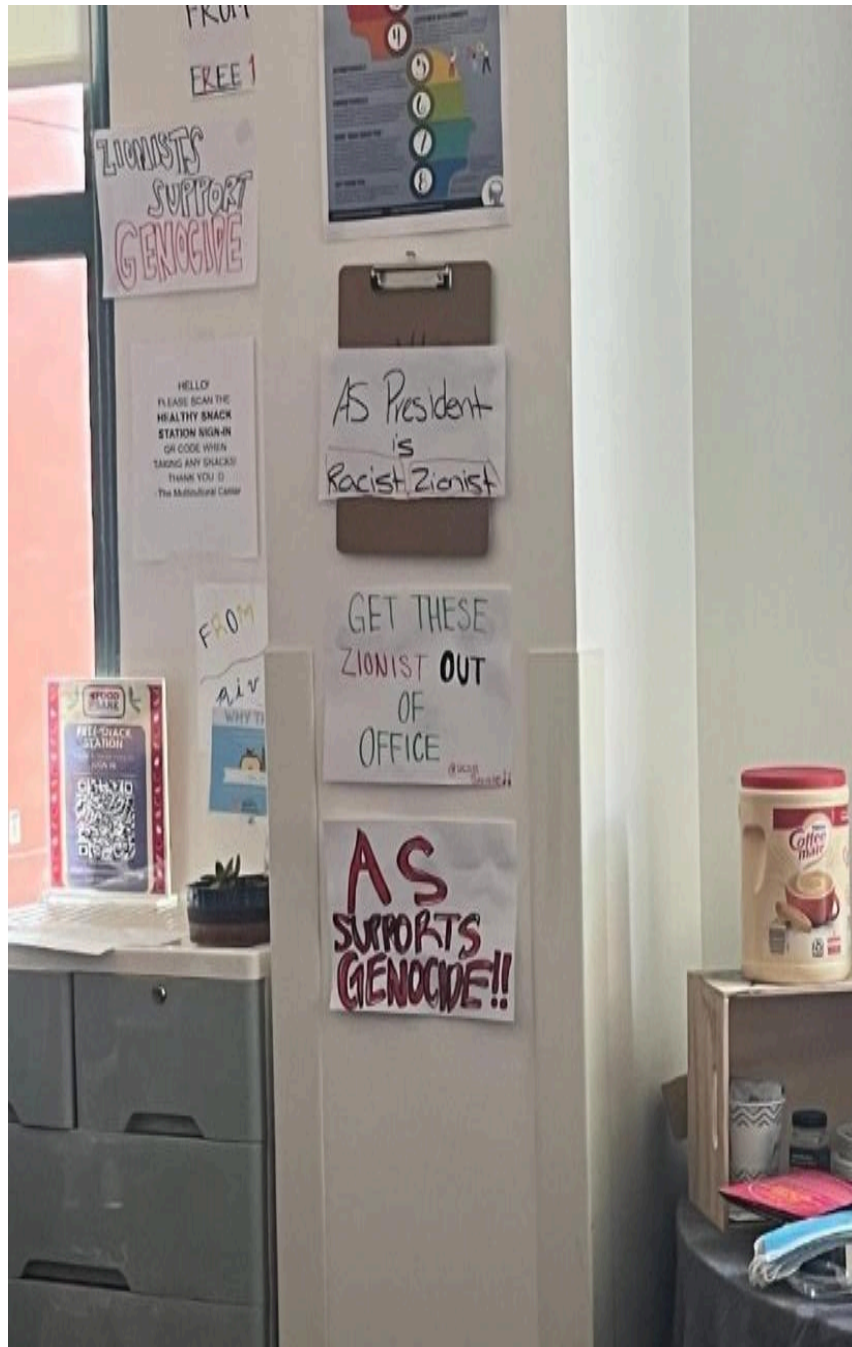
⁸ Pew Research Center, *Jewish Americans in 2020: U.S. Jews’ connections with and attitudes toward Israel*, (May 11, 2021), <https://www.pewresearch.org/religion/2021/05/11/u-s-jews-connections-with-andattitudes-toward-israel/>.

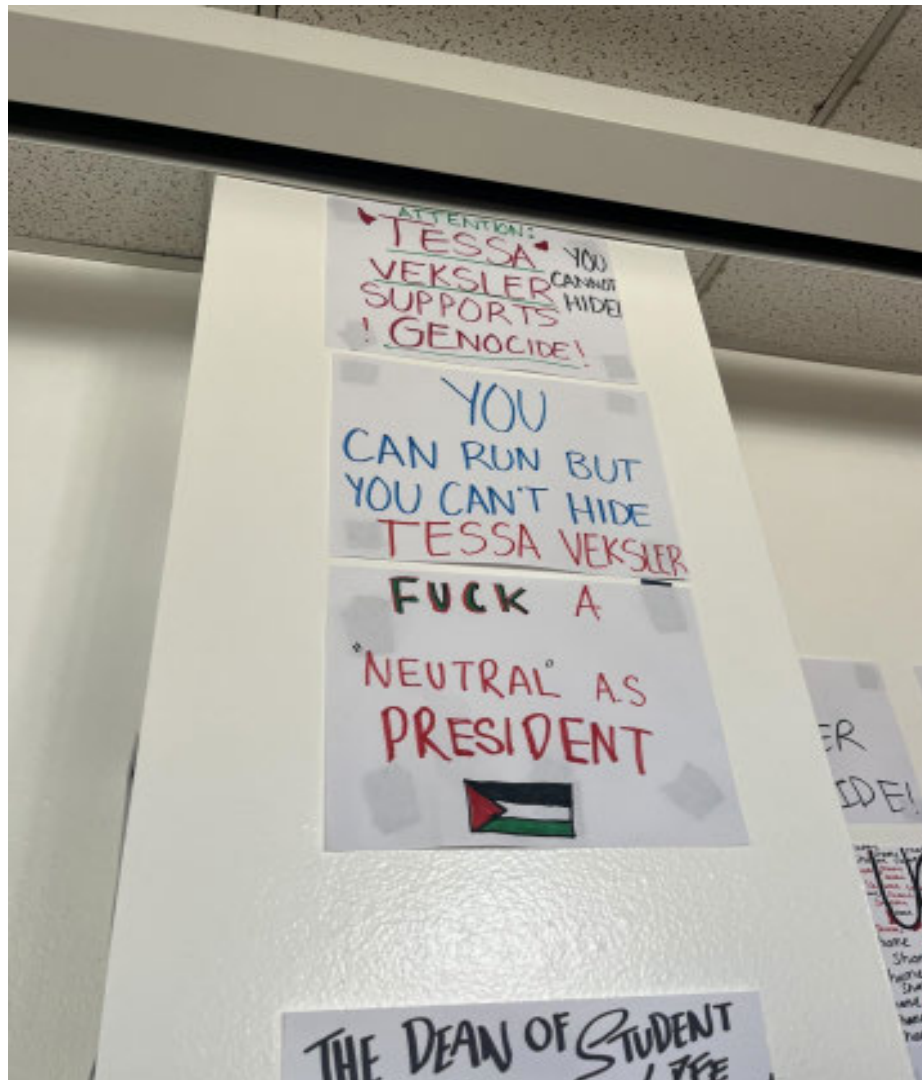




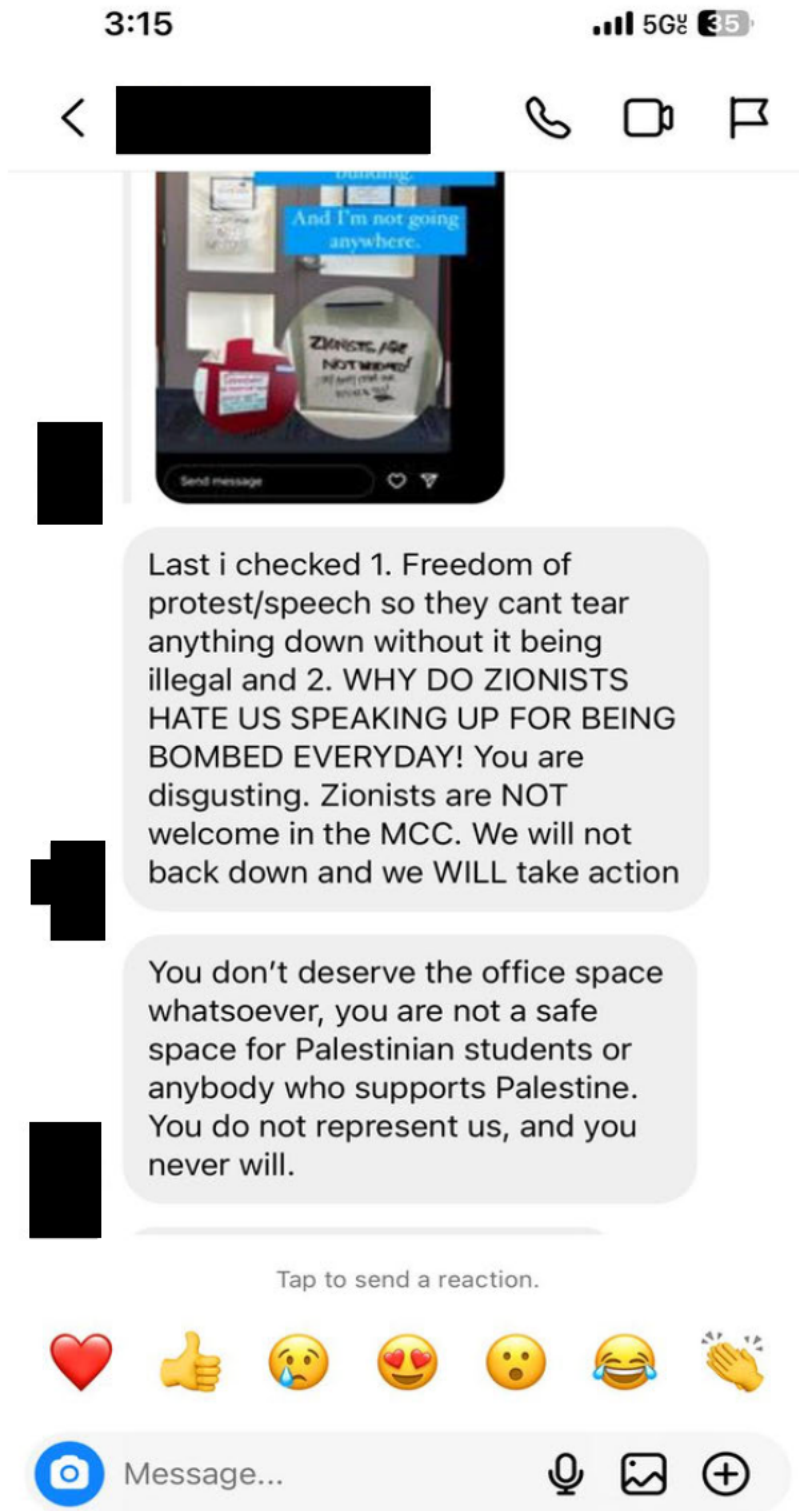


When Ms. Veksler and a group of Jewish students attempted to visit the MCC on February 26, 2024, a group of students hung up additional harassing posters while Ms. Veksler was present, with messages such as: "Zionists not allowed," "AS president is racist Zionist," and "Get these Zionists out of office;" some of the posters contained ominous warnings directed at Ms. Veksler, such as "You can run but you can't hide Tessa Veksler," and "you cannot hide."





On or about February 26, 2024, Ms. Veksler's peers also posted demeaning messages and issued veiled threats on social media, stating for instance: "You are disgusting. Zionists are NOT welcome in the MCC. We will not back down and we WILL take action;" and "PLZ [sic] GO. WE DONT LIKE ZIONISTS." Students referred to Ms. Veksler as a "Zionist dog."







Another harassing post about Ms. Veksler stated “fuck your white comfort in stealing a multicultural center,” thereby erasing Ms. Veksler’s Jewish identity by implying that Jews are not entitled to be included with other groups that have a shared ancestral and ethnic heritage who are part of UCSB’s multicultural space on campus.



The online harassment of Ms. Veksler has also involved doxing; one student posted her private telephone number on Instagram on or about March 5, 2024.

While some posters hung by UCSB students in the MCC equated Zionism with racism and terrorism, another one stated, “JVP MORE than welcome,” thereby signaling that only anti-Zionists are valued and welcome on campus, while Jews like Ms. Veksler, for whom a connection to Israel is integral to their Jewish identity, are to be demonized, shunned and ostracized from campus spaces.⁹



⁹ Jewish Voice for Peace (“JVP”) describes itself as “the largest progressive Jewish anti-Zionist organization in the world” and supports the anti-Semitic Boycott, Divestment and Sanctions movement. *See, e.g.* <https://www.jewishvoiceforpeace.org/2015/02/20/jewish-voice-for-peace-on-boycott-divestment-and-sanctions/> As noted *supra*, in footnote 8, eight in ten Jews (the clear majority of Jews) say that caring about Israel is an essential or important part of what being Jewish means to them.

UCSB students have also invoked the anti-Semitic trope of dual loyalties by insinuating that Ms. Veksler is unfit to serve in her elected position as president of the student government because of her Jewish ethnic identity.

One public Instagram story, posted on or about December 25, 2023 said: “she’s accomplished nothing besides promote Israeli propaganda...we want her out of AS [Associated Students]. call her Zionist ass out!!!!” Another message, posted on or about December 28, 2023 blamed Ms. Veksler for the actions of Israel – a common indicator of anti-Semitism – as justification for her ousting, stating: “you nearly singlehandedly enforce the zionist (terrorist) aggression on this campus...@tessaveksler RESIGN NOW. RESIGN NOW. RESIGN NOW.”

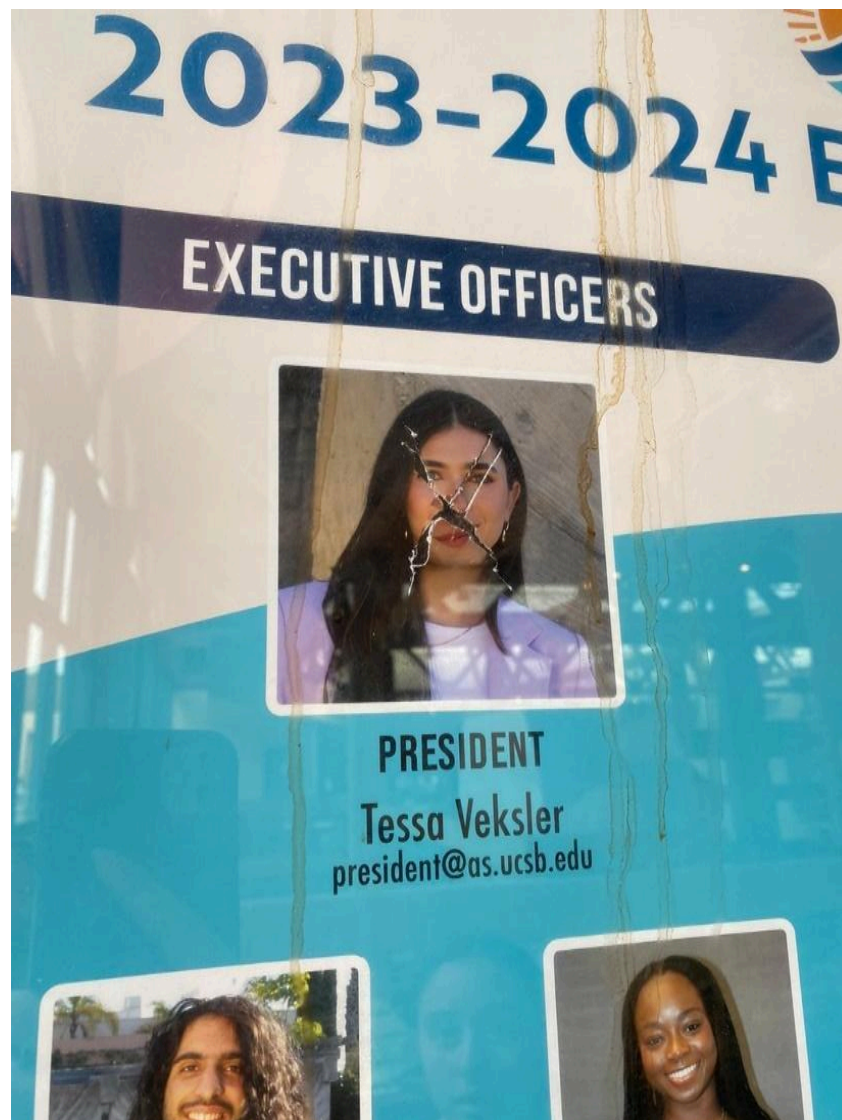




In another message, posted on or about March 6, 2024 UCSB students accused Ms. Veksler of dual-loyalties while also playing on another anti-Semitic trope of the greedy Jew, falsely stating that “Tessa is being funded by a foreign government . . . to . . . line her pockets for clout,” thereby insinuating that as a Jew Ms. Veksler is an agent of and beholden to the interests of the Israeli government.



The harassment of Ms. Veksler continues to this day. On or about April 9, 2024, a student government poster with Ms. Veksler's image that was hanging at the University Center on campus was vandalized. The poster featured photographs of several members of the student government including Ms. Veksler, but only her photograph was slashed. This violent act is a concerning escalation of the targeted harassment directed at Ms. over the last seven months and has heightened her safety concerns on campus.



- B. The University had knowledge of the severe and persistent anti-Semitic harassment directed at Ms. Veksler, but it failed to take prompt and effective steps to stop it or address the hostile environment.**

Although Ms. Veksler reported the harassment and its harmful impact on her to University administrators around December 10, 2023, the University's Office of Equal Opportunity and Discrimination Prevention did not respond to her for over 3 months. In its delayed response, the University referenced more recent events at the MCC and said it was removing unapproved messages "from locations that are not approved for messages of any kind." But there was no indication that the University had undertaken meaningful action during the previous 3 months to address Ms. Veksler's prior report of ongoing harassment based on her Jewish

identity, and her plea to the University to protect her from the negative impact the harassment has had on her mental health, academics, and ability to lead the student body as their president.

Worse, rather than condemn and stop the harassment, the University allowed it to be publicized further to the campus community when the signs saying “Zionists are not welcomed” were posted on UCSB MCC’s official Instagram page.

It was not until February 26 – 4 months after the harassment began, over 2 months after Ms. Veksler’s December 10th email, and after the harassment had escalated to the physical campus at the MCC – that the University finally sent a statement to the community purporting to address the situation. But the University’s February 26th statement failed to specifically mention and condemn the anti-Jewish hostility and targeted harassment directed at Ms. Veksler and the exclusion of Jews from the MCC on the basis of shared ancestry connected to Israel. Moreover, the statement failed to acknowledge and denounce the harassment at the MCC as an escalation and continuation of the targeted campaign of harassment against Ms. Veksler that had been ongoing for over 4 months.

While Ms. Veksler did not file any allegations through the University’s internal grievance procedures regarding the harassment that occurred at the MCC, the University nevertheless claimed it was conducting a bias incident review of the incidents at the MCC. However, as the most recent incident of vandalism on April 9 shows, the harassment against Ms. Veksler has continued and intensified since then. It is therefore clear that the university has failed to stop the harassment or adequately address the hostile environment, and further, that the University lacks a competent resolution process for addressing violations of the sort Ms. Veksler has faced.

C. Ms. Veksler has been harmed by relentless bullying and harassment from her peers.

Seven months of being harassed, threatened and shunned has caused Ms. Veksler to fear for her safety on campus, negatively impacted her mental health, adversely affected her academic performance, and undermined her ability to lead the student body as student government president. Ms. Veksler suffered from panic attacks as a result of the threats and harassment against her. To avoid the harassment and hostile environment, she was forced to stay off campus during the fall semester final exam period and had to take her exams online instead of in-person on campus like the rest of her peers. The April 9 incident, when her publicly displayed photograph was vandalized, has made Ms. Veksler feel even more frightened for her safety and well-being on campus.

II. UCSB has failed to adequately address the harassment against Ms. Veksler on the basis of her Jewish shared ancestry and permitted a hostile environment, which has interfered with Ms. Veksler's ability to participate fully in educational opportunities on campus

Title VI prohibits discrimination on the basis of race, color, and national origin in educational institutions that receive federal funding.¹⁰ Guidance issued by the OCR and the Department of Justice since 2004 has extended Title VI protections to cover discrimination against Jews on the basis of their “actual or perceived shared ancestry or ethnic characteristics.”¹¹

As clarified in Executive Order 13899 (the “Executive Order”), which has been incorporated into OCR’s current policy guidance, Title VI must be enforced “against prohibited forms of discrimination rooted in anti-Semitism as vigorously as against all other forms of discrimination prohibited by Title VI.”¹² Further, the Executive

¹⁰ See 42 U.S.C. § 2000d *et seq.*

¹¹ See *Dear Colleague Letter*, U.S. Dep’t of Educ.–Office for C. R. (Nov. 7, 2023), available at <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf>; see also *FACT SHEET: Protecting Students from Discrimination Based on Shared Ancestry or Ethnic Characteristics* (Jan. 4, 2023), <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-factsheet-shared-ancestry-202301.pdf>; *Know Your Rights: Title VI and Religion*, U.S. DEP’T EDUC.–OFFICE FOR C.R. (Jan. 17, 2017), <https://www2.ed.gov/about/offices/list/ocr/docs/know-rights-201701-religious-disc.pdf>, see also Russlynn Ali, “*Dear Colleague Letter*” at 2, U.S. DEP’T EDUC.–OFFICE FOR C.R. (Oct. 26, 2010) [hereinafter 2010 *Dear Colleague Letter*], <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.pdf>; Letter from Thomas E. Perez, Assistant Att’y Gen., U.S. Dep’t of Just.–C.R. Div., to Russlyn H. Ali, Assistant Sec’y for C.R., U.S. Dep’t of Educ.–Office for C.R., *Re: Title VI and Coverage of Religiously Identifiable Groups* (Sep. 8, 2010), https://www.justice.gov/sites/default/files/crt/legacy/2011/05/04/090810_AAG_Perez_Letter_to_Ed_OCR_Title%20VI_and_Religiously_Identifiable_Groups.pdf; Kenneth L. Marcus, *Title VI and Title IX Religious Discrimination in Schools and Colleges: Dear Colleague Letter*, U.S. DEP’T OF EDUC.–OFFICE FOR C. R. (Sep. 13, 2004), <https://www2.ed.gov/about/offices/list/ocr/religious-rights2004.html>.

¹² Exec. Order No. 13899 §1, 3 C.F.R. 68779-68780 (2019); see also *Questions and Answers on Executive Order 13899 (Combatting Anti-Semitism and OCR’s Enforcement of Title VI of the Civil Rights Act of 1964)*, U.S. DEP’T EDUC.–OFFICE FOR C.R. (Jan. 19, 2021), <https://www2.ed.gov/about/offices/list/ocr/docs/ga-titleix-anti-semitism-20210119.pdf>

Order directs the Department of Education to refer to the International Holocaust Remembrance Alliance working definition of antisemitism (the “IHRA Definition”) and its contemporary examples when investigating allegations of anti-Semitism under Title VI.¹³

According to the IHRA Definition, “the denial to Jews of opportunities or services available to others” is “antisemitic discrimination.”¹⁴ The IHRA Definition also provides that denying the Jewish people’s right to self-determination (and by extension, denying that the Jews are a people with an ancestral connection to Israel) is an indicium of anti-Semitism.¹⁵ Other examples of anti-Semitism under the IHRA Definition include “holding Jews collectively responsible for actions of the State of Israel”; “making mendacious, dehumanizing, [or] demonizing...allegations about Jews as such”; and “accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.”¹⁶

Title VI protects students from harassment that creates a hostile environment on campus. For purposes of Title VI, harassment creates a “hostile environment” when, based on the totality of the circumstances, the harassment “is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person’s ability to participate in or benefit from the recipient’s education program or activity.”¹⁷ A Title VI recipient “must take immediate and effective action to respond to harassment that creates a hostile environment.”¹⁸ Further, a university can violate Title VI if peer harassment “is sufficiently serious that it creates a hostile

; *See further* OCR, Dear Colleague Letter of November 7, 2023, <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf> (referencing EO 13899 and its FAQ cited *infra*); OCR, Dear Colleague Letter of May 25, 2023, <https://www2.ed.gov/about/offices/list/ocr/docs/antisemitism-dcl.pdf> (same).

¹³ *See* Exec. Order No. 13899 §2(a)(i) and (ii); *see also* INT’L HOLOCAUST REMEMBRANCE ALLIANCE, *Working Definition of Antisemitism*, <https://www.holocaustremembrance.com/working-definition-antisemitism> (last visited Oct. 1, 2021) [hereinafter IHRA Definition].

¹⁴ IHRA Definition, *supra* note 6.

¹⁵ *Id.* (explaining that “[d]enying the Jewish people their right to self-determination” is a form of anti-Semitism).

¹⁶ *Id.*

¹⁷ *See Dear Colleague Letter*, U.S. DEP’T OF EDUC.–OFFICE FOR C. R. (Nov. 7, 2023), at 2, available at

<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-202311-discrimination-harassment-shared-ancestry.pdf>.

¹⁸ *Id.*

environment and such harassment is encouraged, tolerated, not adequately addressed, or ignored by school employees.”¹⁹ And a university must respond to discriminatory harassment when such harassment “negatively affect[s] the ability and willingness of Jewish students to participate fully in the school’s education programs and activities.”²⁰

The Executive Order is particularly relevant here, where the unlawful harassment is motivated by anti-Semitic bias and targets Ms. Veksler on the basis of her actual or perceived shared ancestry and ethnic identity connected to Israel. All of the indicia of anti-Semitic bias described in the IHRA Definition as mentioned above were present in the various harassing messages directed at Ms. Veksler with the intent of vilifying, shaming and isolating her from the campus community based on her Jewish identity, i.e. because she is a Zionist. Further, the suggestion that Ms. Veksler’s Jewish ethnic identity renders her unfit to serve in her position as UCSB’s President or that she is using her position to do the bidding of the State of Israel revives the age-old anti-Semitic accusation of dual-loyalties; it implies that she is more loyal “to Israel, or to the alleged priorities of Jews worldwide,” than to the interests or mission of the AS to serve the UCSB student body. Finally, those who target Ms. Veksler, deliberately mischaracterize her “Zionism” as a political opinion rather than as an integral component of her Jewish ancestral heritage. They deny and erase Ms. Veksler’s Jewish ancestral identity, and mislabel her pride in and support for the Jewish people as political expression. Ms. Veksler was targeted on the basis of her Jewish identity, not on the basis of any opinion (that she never expressed) about the policies of the government of Israel.

As noted, under Title VI, a university must respond to discriminatory harassment when such harassment “negatively affect[s] the ability and willingness of Jewish students to participate fully in the school’s education programs and activities.”²¹ Here, UCSB has failed to take steps to address the severe and persistent harassment against Ms. Veksler, which was aimed to undermine Ms. Veksler’s leadership as student body president by sowing doubts amongst the student body about her ability to lead due to her Jewish identity, and thereby interfered with her ability to carry out her presidency.

In Ms. Veksler’s case, UCSB did not take immediate and effective steps to end the

¹⁹ Russlynn Ali, “*Dear Colleague Letter*” at 2, U.S. DEP’T EDUC.—OFFICE FOR C.R. (Oct. 26, 2010) [hereinafter 2010 Dear Colleague Letter], at 2, <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.pdf> (“[Under Title VI, a] school is responsible for addressing harassment incidents about which it knows or reasonably should have known”).

²⁰ *Id.* at 5-6.

²¹ *Id.*

harassment. The University has failed to protect Ms. Veksler from anti-Semitic taunts and threats such as “you can run but you can’t hide,” which have led Ms. Veksler to feel so unsafe on the UCSB campus that she avoided campus altogether during exams. The University has not publicly and specifically condemned the efforts to bully and intimidate Ms. Veksler on the basis of her Jewish identity. Rather than do that, the University allowed the harassment to be posted on the official UCSB MCC Instagram page, thereby further publicizing it to the student body. It is no wonder, then, that, left unchecked, students felt emboldened to continue targeting Ms. Veksler with increasing virulence and persistence. Indeed, the harassment has escalated over the last seven months; it started online and when the university failed to intervene, it then moved onto the physical campus at the MCC. As shown by the most recent incident of vandalism on April 9, the harassment targeting Ms. Veksler has persisted with no signs of abating.

By failing to address the severe and persistent harassment against Ms. Veksler and the negative impact of the hostile environment, the University has violated Title VI.

III. Requested Remedies

In light of UCSB’s failure to (1) address the anti-Semitic harassment against Ms. Veksler on the basis of her shared Jewish ancestry and ethnic identity, and (2) take steps to eliminate the hostile environment and its impact on Ms. Veksler, OCR should require UCSB to take the following steps to come into compliance with Title VI:

- A. Ensure that all students are provided with a safe environment free from harassment and discrimination, and have equal access to university facilities and services on a non-discriminatory basis, by:
 1. Conducting a full investigation of discriminatory and harassing conduct against Ms. Veksler on the basis of her shared ancestral identity, which violated university policies, and take all appropriate measures, including disciplinary matters, that are recommended as a result of the investigation; and
 2. Conducting outreach to the broader UCSB Jewish community to find out if and how the campus climate for Jewish students has been impacted by the public anti-Semitic harassment and threats against Jews on campus on the basis of their shared ancestry. This outreach should specifically center on Jewish students rather than being buried in broader anti-discrimination efforts involving other communities not at issue in this complaint.

- B. Ensure that the UCSB community understands and recognizes the type of anti-Semitic harassment and discrimination that targets Jewish students on the basis of their shared ancestry by:
1. Incorporating the IHRA working definition, including its guiding examples, into UCSB's anti-discrimination policies consistent with Executive Order 13899 and the values of free speech and academic freedom; and
 2. Providing training on anti-Semitism to university administrators, faculty, students and staff based upon UCSB's revised anti-discrimination policies. The training should familiarize students, staff, administrators, and other members of the community with traditional as well as contemporary anti-Semitic stereotypes and conspiracy theories and their social and political functions, so that the campus community will be able to better identify and respond to anti-Semitic incidents in the future, particularly those that involve Jewish shared ancestry connected to Israel.
 3. Issue a statement clearly and specifically condemning anti-Semitic harassment and efforts to shun and marginalize students like Ms. Veksler on the basis of their Jewish shared ancestry and ethnicity connected to Israel. We offer the following draft language as an example of a statement UCSB might issue:

We condemn anti-Semitism in all its forms. We recognize that Zionism is a key component of the ancestral and ethnic identity of many students on our campus. Efforts to demonize Zionism and make these UCSB students feel unsafe expressing this part of their Jewish identity is contrary to our university's basic values of mutual respect and inclusion. Our university must be a place for the free and open exchange of ideas. It is never acceptable to demonize, harass, intimidate, marginalize or exclude any part of our university community on the basis of its identity.

AS President Tessa Veksler has recently been subjected to a disturbing campaign of anti-Semitic harassment that targets her on the basis of her shared ancestral and ethnic Jewish identity. Targeting a UCSB student in this

manner is unacceptable, contrary to our values of mutual respect and inclusion, and will be met with commensurate remedial and disciplinary action.

IV. **Request for Section 201(a) Mediation**

The Complainants request mediation at the time of filing pursuant to Section 201(a) of OCR's Case Processing Manual.

V. **Conclusion**

For the foregoing reasons, the Brandeis Center and Ms. Veksler request an investigation into UCSB's compliance with Title VI.



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