

Harout Gulesserian
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1/27/2025

To: Vice Chancellor Mark Krause
Office of Compliance
University of California, Los Angeles
Wilshire Center, Suite 700
Los Angeles, Ca, 90095

I, Harout Gulesserian, make no waivers or admissions and reserve all rights, without limitation, to amend, revoke, modify, or supplement any and all provisions of this complaint, especially as additional evidence is discovered. All issues or statements raised herein are being presented without any limitations.

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Dear Vice Chancellor Krause,

Thank you for your letter dated January 12, 2025, regarding my Whistleblower Retaliation Complaint EP23681 originally submitted on September 10th, 2024, to your respective office. As requested, I (Harout Gulessarian) am submitting further clarification and supporting facts that demonstrate the following: my entitlement to overtime compensation despite the directive from management not to record overtime hours, proof of my demotion despite HR's lack of records, and my being subjected to unfair performance evaluations that were arguably not coaching or counseling memos.

I. Entitlement to Overtime Pay Under California Labor Code Section 510

As noted in your letter, I respectfully submit the following: I consistently worked between 50 and 60 hours per week but due to supervisor expectations only 40 hours were reported on my timesheets at my supervisor's request. My scenario from initial hiring was regarded by my supervisor as if I was going to ultimately be rewarded and made whole so long as I tirelessly worked weekends and or evenings on a weekly obligation basis that I met and fulfilled for approximately 2 years, when I finally realized that I will never be rewarded nor paid nor made whole for all the actual labor I did as expected of me by my supervisor; therefore, once I reported this unethical and illegal workplace to outside departments, only then did supervisor Bennett Novitch begin to say that it was no longer necessary for me to do the weekend and evening work, because it was obvious he had no intention what so ever to insure my proper pay for the labor I actually worked per my employment agreement, as the documentary evidence below will conclusively establish.

Exhibit A without limitations:



BENNETT NOVITCH <bnovitch@g.ucla.edu>
to me ▾

Hi Harout,

I wanted to follow up on our discussion this afternoon, as I fear that our conversation got overheated at times, for which I am very sorry. To recap some of our action items:

1. I am trying to arrange a time to speak with TDG, ideally on Monday, to discuss the steps that should be taken with filing an invention report. Please do not engage with them without including me on the conversation.
2. I would like you to please prepare a written form of your protocol that is suitable for distributing to our lab members who would like to give it a try. I would like to review this document before it's sent around, and send it coming from both of us with a clear statement that it must be treated as privileged information, and that it is not to be distributed to anyone outside our group for the time being. It actually might be better to arrange an in person meeting for the distribution so that we can add a more human element and offer an opportunity to discuss steps in the methods as well as show what one might expect it do, and what its limitations are (i.e. the point that you still need to test variables like IWR1E, etc).
3. I would like to finish reviewing the data that you have in hand to accompany the RNA samples that you've collected so that I can gauge what each sample is going to bring representing. If you have any qPCR from these samples, that would be particularly great to see as it might help give us some preview as to how some key genes might be changing. But it's okay if we don't have that, we can gauge by morphology alone and take the plunge.
4. I would like to get the samples submitted next week so that we can get this analysis underway. We will also need to recruit someone to do the bioinformatic processing. My inclination would be to ask Eric if he's willing to take it on, but Salena might also be willing to help. If necessary, we can turn to others outside our workgroup, but obviously it makes a lot of sense to keep it in house as much as we can.
5. I would like to continue our discussion on the layout of figures which would be needed for both an invention report and for a publication. It looks right now like I may have some time free on Tuesday, Wednesday and Friday.
6. I am troubled by the message that you received, and I would like to find a way to confront the issues head on and not just sweep it under the rug. Would you be open to having a conversation with Natella and me so that we can clear the air? I know that these matters can be really uncomfortable, but what was sent (which I think may have been intended to be a joke- Natella's humor can lean to the dark), was unquestionably unprofessional and inappropriate, and it needs to be called out as such. They owe you an apology at the very least. I have done mediations in the past with others who were having conflicts, and it did seem to help to smooth things out in the end despite the initial awkwardness confronting the situation. Outside mediation is also possible.
7. Please take some time off from the lab- nobody should be working 7 days a week!

Ben

Fri, Feb 23, 2024, 11:56 PM

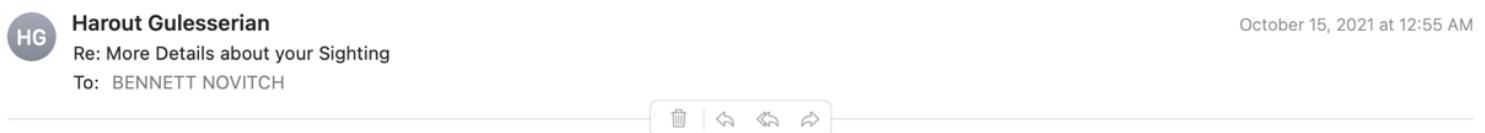


After working for two years without commensurate pay and trusting that I would eventually be compensated, I began seeking outside assistance. Only then did Supervisor Novitch simultaneously discourage me from overworking myself while still failing to ensure that I receive the promised compensation he had led me to believe would ultimately come. Moreover, I believe there are credible witnesses who still work for UCLA who can attest to my weekend and holiday work.

Because of the compounding events of my weekend and holiday work, I believe I am entitled to overtime compensation under **California Labor Code Section 510**, which mandates that employees must be paid overtime for hours worked over 8 hours in a day or 40 hours in a week, irrespective of whether overtime is pre-approved or directed.

Supervisor Novitch was well aware that weekend work was required for this job and that I was the one putting in the work on those days without compensation. At the same time, I was fed false and misleading statements regarding the progression of my career, which is now jeopardized due to this ongoing situation at UCLA. Evidence of this work is shown going back to October 15th, 2021, where I was reporting a security concern to Dr. Novitch that indirectly shows that I was indeed working overtime weekends and holidays. The email below shows that I had no days off for those consecutive days listed - which started all the way back into my internship. Supervisor Bennett Novitch stopped responding to the email chain after I notified Supervisor Novitch of this.

Exhibit B without limitations:


HG Harout Gulessarian October 15, 2021 at 12:55 AM
Re: More Details about your Sighting
To: BENNETT NOVITCH

Good evening Dr. Novitch,

I went through my phone; below, I list each approximate window of time in regards to when I left lab each respective day starting from the second 2nd of October and ending the 10th of October.

Given that the individual we referenced in the meeting today was observed in the hallway as I was departing from lab, I think it may be prudent to search the security cameras during the following timepoints:

Saturday October 2nd left around 9:00 pm (check camera 8:10pm-9:20pm)
Sunday October 3rd left around 11:00 AM (check camera 10:10am-11:10 am)
Monday October 4th left around 7:15 pm (check camera 6:15pm-7:25pm)
Tuesday October 5th left around 9:10 pm (check camera 8:10pm-9:30pm)
Wednesday October 6th left around 7:50 pm (check camera 7:00pm-8:10pm)
Thursday October 7th left around 5:00 pm (check camera 4:30pm-5:10pm)
Friday October 8th left around 7:00 pm (check camera 6:30pm-7:30pm)
Saturday October 9th left around 8:30 pm (check camera 7:30pm-8:40pm)
Sunday October 10th left around 1:00pm (check camera 12:30pm-1:40pm)

Hope this timeline helps identify the unknown individual.

Sincerely,
Harout Gulessarian

II. Material and Negative Impact on Compensation

The failure to compensate me for the overtime hours worked has had a material and negative impact on my financial privileges. Even though I worked well beyond 40 hours per week, I was only paid for 40 hours, resulting in significant lost wages. In addition to the direct financial impact, this lack of compensation for overtime work contributed to the erosion of my job satisfaction and sense of fairness in the workplace.

As a result of these circumstances, I believe I am entitled to be compensated for the overtime hours I worked, as per California's labor laws, and the actions of Dr. Novitch and the department's failure to correct the situation constitute a material and negative change in my employment terms and conditions without limitations.

III. Supporting Documentation

I have included several pieces of supporting documentation that further substantiate my claims:

1. A specific instance where Dr. Novitch explicitly acknowledged the weekend work and told me he would compensate me in the future, while still instructing me to report only weekday hours on my timesheet.
2. Records of work schedules or project logs showing that I regularly worked beyond my designated hours to ensure the completion of critical tasks and projects.
3. Emails and messages where I communicated concerns about the excessive work hours and the lack of support from the graduate students.

Exhibit C: Emails, without limitations, documenting my initial requests for weekend access, with confirmation that Mark Lucas was aware of the requests and granted the necessary access.

Harout Gulessrian 4/27/22
To: BTam@mednet.ucla.edu Cc: BENNETT >

6th floor CHS access issues

Good evening,

My name is Harout Gulessrian,

UID: #[505876880](#)
Back of card #233982

I am an intern researcher in Dr. Novitch's lab. I'm having trouble accessing the 6th floor early mornings or late in the evenings. The elevator key flashes a blue light instead of green. Also I'm hoping my weekend access was not altered due to the changes. Would you kindly grant access during the weekend if it was altered.

Thank you for your time.

Kind regards,
Gulessrian, Harout

From: Lucas, Mark <MLucas@mednet.ucla.edu>
Sent: Thursday, July 14, 2022 8:21 AM
To: Harout, Gulessrian (Student) <GHarout@mednet.ucla.edu>
Subject: ID Badge

Hi, attached please find your ID badge application. Please PRINT OUT both pages and take, along with photo ID, to B8-153 CHS. They will provide an ID badge. Once you have it, can you please let me know the 6 digit code on the back so that we can get you building and lab/elevator access? Thanks.

From: Harout, Gulessrian (Student) <GHarout@mednet.ucla.edu>
Sent: Monday, July 25, 2022 11:04 AM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Subject: Re: ID Badge

Good morning Mark,

I got the Badge ID thank you very much for that. The gentlemen told me I need permission for weekend access. If possible, will you grant permission for weekend access? as I typically work weekends. The 6-digit code behind my ID is: 250778.

Also, I have a few issues with my timesheets. I officially started work on 6/28/2022. Since then, I have yet to fill out a timesheet. Today I received an email to fill out the timesheets for the past two weeks. While trying to logon to the suggested site I got this error (please see attached).

Thank you for your time and assistance Mark.

Kind regards,
Harout

Lucas, Mark
To: ○ Harout, Gulessrian (Student); ○ Gulessrian, Harout K.
Mon 7/25/2022 4:06 PM

Hi. You should have access now. Thanks.

[Thank you!](#) [Thank you so much!](#) [It worked! Thank you!](#)

[Reply](#) [Reply all](#) [Forward](#)

Exhibit D: This email notifies Supervisor Bennett Novitch of critical time points in the organoid-making process that fell over a weekend in July 2023. These time-sensitive steps were essential for ongoing collaborative projects with partner laboratories without limitations.

  **Harout Gulessarian** July 13, 2023 at 12:55 PM
Re: D35 XF organoids? Details

To: Marie Payne, Cc: Neil Lin, BENNETT NOVITCH, ERIC HEINRICHSH

Hi all,

Ben and I formulated a plan to accommodate the groups needs of XF organoids for the seahorse assay.

The earliest XF d35 we have will be on 08/12/2023, a Saturday. Followed by another batch which should be d35 on 08/18/23, a Friday.

Please let me know which date better suits your workflow and I will set aside some organoids.

Harout

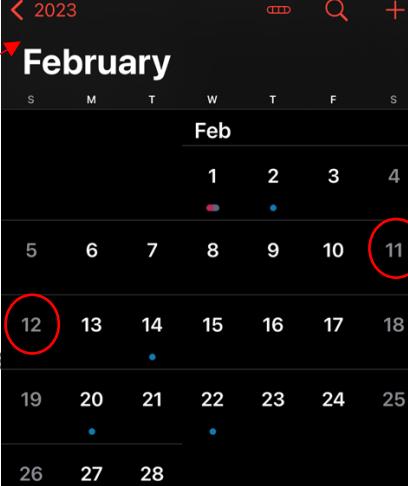
Exhibit E: Documentation from Saturday, February 19th, 2023, without limitations, showing that Bennett Novitch was fully aware of my work on weekends, holidays, and overtime. Despite promises of compensation, it was never delivered.

Exhibit F: A collection of text messages and emails demonstrating that I was assigned lab duties on weekends in 2023, accompanied by timesheets that do not accurately reflect the actual hours worked without limitations.

Eric Heinrichs 2/9/23

And yeah I should be good for the weekend

Also I won't be around this weekend (saturday and sunday) do you think you'll be well enough to come in? If not well have to figure out who can take care of stuff



GULESSERIAN,HAROUT KARNIK

Employee Tasks Messages History Log Off Help

Timesheet

Pay Period: 02/05/2023 - 02/18/2023 (History - Adjustments Allowed) B1

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324)
Full Acct Unit: NEUROROB
Barg Unit: RX

History Review

HISTORY

History Status (Not Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary												Hide			
Hours	Sun 02/05	Mon 02/06	Tue 02/07	Wed 02/08	Thu 02/09	Fri 02/10	Sat 02/11	Sun 02/12	Mon 02/13	Tue 02/14	Wed 02/15	Thu 02/16	Fri 02/17	Sat 02/18	Total
Normal Hours Worked															67.00
Sick															12.00
Totals:	0.00	8.00	8.00	8.00	8.00	7.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	9.00	79.00

Paid Summary

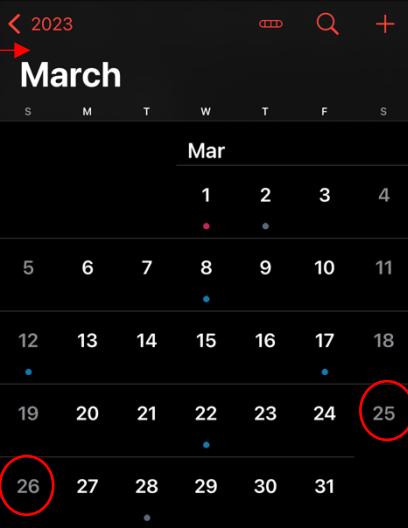
Regular Time (REG)	4.00	8.00	8.00	7.00					8.00	8.00	8.00	8.00	8.00	67.00	
Sick Leave (REG)	8.00	4.00													12.00

Seant Ryan 3/24/23

Thanks bro! I should be good this weekend! Tomorrow is not too bad, Sunday I'll run the qPCR and feed all the batches that need to be fed

Not a problem! I'm happy to help 😊

I'll give you a head's up if there's any day I'd like to take off 🤞, feel free to let me know if you need anything covered this weekend as well



GULESSERIAN,HAROUT KARNIK

Employee Tasks Messages History Log Off Help

Timesheet

Pay Period: 03/19/2023 - 04/01/2023 (History - Adjustments Allowed) B1

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324)
Full Acct Unit: NEUROROB
Barg Unit: RX

History Review

HISTORY

History Status (Approved, Processed, Completed)

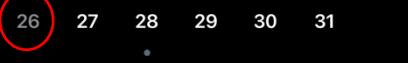
Show History Pay Period Details

History Input Summary												Hide			
Hours	Sun 03/19	Mon 03/20	Tue 03/21	Wed 03/22	Thu 03/23	Fri 03/24	Sat 03/25	Sun 03/26	Mon 03/27	Tue 03/28	Wed 03/29	Thu 03/30	Fri 03/31	Sat 04/01	Total
Normal Hours Worked															72.00
Holiday															8.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	0.00	80.00

Paid Summary

Regular Time (REG)	8.00	8.00	8.00	8.00					8.00	8.00	8.00	8.00	8.00	72.00	
Holiday Pay (REG)															8.00

SR



Hey Seant I would like to go in early tomorrow around 7:00am and then go in Sunday around 8:00pm so I could have some time off as well

Sounds good! I'll try and match the time I come in with you so we can work together on TC - I'm also good to cover the entire day for either weekend day if you'd like that as well.

Jul 1, 2023 at 06:49

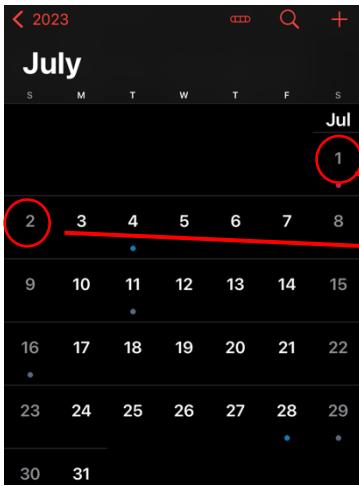
Hey Harout, just parked, should be at lab around 7/7/05

Sounds good I'm 20 min away

You inside?

Jul 1, 2023 at 10:19

First MEF thaw done



GULESSERIAN,HAROUT KARNIK

Employee Tasks Messages History Log Off Help

Timesheet

Pay Period: 06/25/2023 - 07/08/2023 (History - Adjustments Allowed) B1

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324)
Full Acct Unit: NEUROROB
Barg Unit: RX

History Review

HISTORY

History Status (Not Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary												Hide			
Hours	Sun 06/25	Mon 06/26	Tue 06/27	Wed 06/28	Thu 06/29	Fri 06/30	Sat 07/01	Sun 07/02	Mon 07/03	Tue 07/04	Wed 07/05	Thu 07/06	Fri 07/07	Sat 07/08	Total
Normal Hours Worked															72.00
Holiday															8.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	0.00	80.00

Paid Summary

Regular Time (REG)	8.00	8.00	8.00	8.00					8.00	8.00	8.00	8.00	8.00	72.00	
Holiday Pay (REG)															8.00

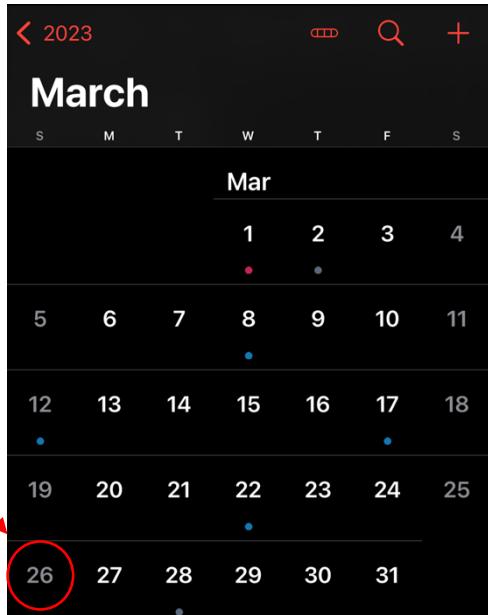
Mar 25, 2023 at 09:49

Hey Harout,

Since we're doing qPCR Sunday I think I'll try to do today as an off day, or just come in the afternoon to work with Jessie on staining depending on what the plan is for today

There shouldn't be any feeding I need covered, all the astrocytes and neurons were fed yesterday

I should be good to come and help with feeding, TC work, and the qPCR tomorrow



Screenshot of a timesheet application interface. At the top, there are navigation links: Employee Tasks, Messages, History, Log Off, Help, and Timesheet. The user's name, GULESSERIAN,HAROUT KARNIK, is displayed along with their UCLA ID (505876880), UCPATH ID (10582324), and departmental information (Full Acct Unit: NEUROBIO, Barg.Unit: RX). Below this, a "History Review" section is shown. Under "HISTORY", there is a table titled "History Input Summary" with columns for Hours and days of the week (Sun through Sat). The "Normal Hours Worked" row shows 8.00 hours for each day, totaling 72.00. The "Holiday" row shows 8.00 hours for Saturday. The "Totals:" row shows 8.00 hours for Saturday. A red box highlights the "0.00" value in the "Sun" column of the "Normal Hours Worked" row. Below this is a "Paid Summary" table, which also includes rows for Regular Time (REG) and Holiday Pay (REG), both showing 8.00 hours.

Hours	Sun 03/19	Mon 03/20	Tue 03/21	Wed 03/22	Thu 03/23	Fri 03/24	Sat 03/25	Sun 03/26	Mon 03/27	Tue 03/28	Wed 03/29	Thu 03/30	Fri 03/31	Sat 04/01	Total
Normal Hours Worked	8.00	8.00	8.00	8.00	8.00	8.00			8.00	8.00	8.00	8.00			72.00
Holiday													8.00		8.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	0.00	80.00

Regular Time (REG)	8.00	8.00	8.00	8.00	8.00	8.00			8.00	8.00	8.00	8.00			72.00	
Holiday Pay (REG)													8.00			8.00

JB

From: Jessie Butch >
To: Harout Gulessarian >
August 18, 2023 at 00:34

Tentative Exp plans?

Hi,

I attached a tentative plan. Do you think its...possible? 😊 I'm wondering about Sunday...it sounds possible...but will definitely be a busy day. We should like bring pizza n snacks to lab before we start lol

If you want to push some stuff back a day, I'm meeting with Ben in the afternoon on Tuesday so pick something that's not an all day thing.

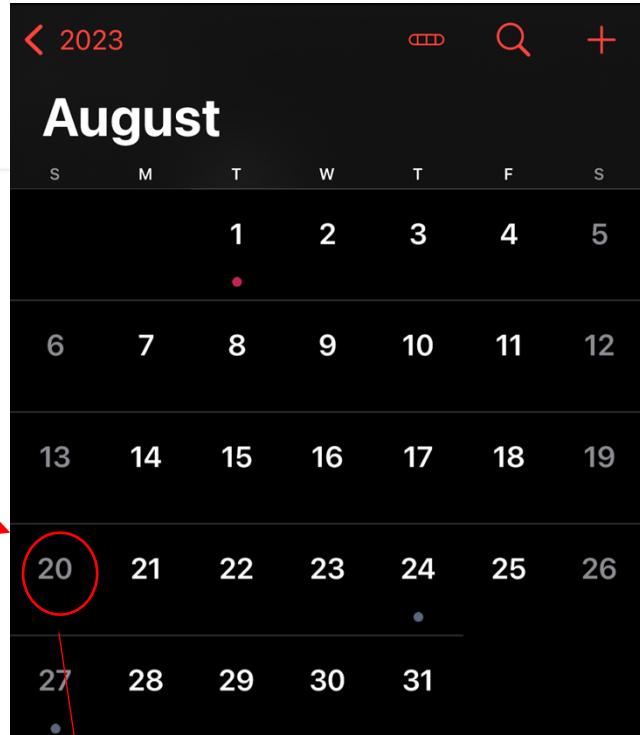
I'm not sure how much Seant can help with his thesis stuff due, but maybe he'll be waiting for Ben's comments by then?

Can you cover Friday?

I'd say add the ADP to the 3x chambers around 11am (or close to that) and then treat the migration wells at ~11:30a so I can fix the chambers, toss in fridge, and start migration. I can treat 1x of the chambers for Sunday before I start, and the rest after the migration is going. That break in the middle can be imaging for the no-treatment slide (and then maybe we get a little break in the middle).

Also if you have time, try to find the PolyIC we received a while back & send me a pic where it is. Should be somewhere in one of the -30 freezers.

-Jessie



Employee Tasks Messages History Log Off Help

GULESSERIAN,HAROUT KARNIK

Timesheet Pay Period: 08/02/2023 - 09/02/2023 (History - Adjustments Allowed) B1 go

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324)
Full Acct Unit: NEUROBIO Barg.Unit: RX

History Review

HISTORY

History Status (Not Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary													Hide		
Hours	Sun 08/20	Mon 08/21	Tue 08/22	Wed 08/23	Thu 08/24	Fri 08/25	Sat 08/26	Sun 08/27	Mon 08/28	Tue 08/29	Wed 08/30	Thu 08/31	Fri 09/01	Sat 09/02	Total
Normal Hours Worked		8.00	8.00	8.00	8.00				8.00	8.00	8.00	8.00	8.00		80.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	0.00	80.00

Paid Summary

Regular Time (REG)	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	80.00
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Exhibit G: Evidence of my weekend work in 2024, without limitations, accompanied by timesheets that do not accurately reflect the actual hours I worked.

Marie Payne March 8, 2024 at 11:38 AM
 Re: Organoid Schedule Details
 To: BENNETT NOVITCH, Harout Gulessserian, Cc: ERIC HEINRICH, Neil Lin

I am going to move discussion of the pair cell assay to another thread so that my initial questions about organoid availability and obtaining the slide for @Harout Gulessserian are not covered up.

[See More from BENNETT NOVITCH](#)

Marie Payne
 PhD Candidate I Lin Laboratory
 Department of Mechanical & Aerospace Engineering
 University of California, Los Angeles

Harout Gulessserian March 9, 2024 at 2:33 PM
 Re: Organoid Schedule Details
 To: Marie Payne, Cc: BENNETT NOVITCH, ERIC HEINRICH, Neil Lin

Hi Marie,

Are you available to pick up the slide from me today? I'm in the TC for another hour or so.

The next organoid batch is ready tomorrow. Are you available to pick up a plate from me tomorrow morning, or should I split it myself?

Let me know, thanks.

Harout

[See More from Marie Payne](#)



Pay Period: 03/03/2024 - 03/16/2024 (History - Adjustments Allowed) B1 [go](#)

GULESSERIAN,HAROUT KARNIK

History Review

[History Status \(Approved, Processed, Completed\)](#)

Show History Pay Period Details

History Input Summary													Hide		
Hours	Sun 03/03	Mon 03/04	Tue 03/05	Wed 03/06	Thu 03/07	Fri 03/08	Sat 03/09	Sun 03/10	Mon 03/11	Tue 03/12	Wed 03/13	Thu 03/14	Fri 03/15	Sat 03/16	Total
Normal Hours Worked		8.00	8.00	8.00	8.00	8.00			8.00	8.00	3.00	3.00	8.00		70.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	3.00	3.00	8.00	0.00	70.00

Paid Summary

Regular Time (REG)	8.00	8.00	8.00	8.00	8.00		8.00	8.00	3.00	3.00	8.00		70.00
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Exhibit H: Examples and evidence of weekend work performed during my internship, without limitations

JB Jessie Butch To: Felix, Harout, Harout > 3/6/22

Cell feeding today-tuesday

Hi,

Please feed these batches while I'm away. I'll have my phone if you guys need anything.

I made media for Randilea to take with the 4x tri-culture #4 plates tomorrow it has GDNF/cAMP added, but not BDNF. Its in the blue rack and I sent her a picture. She may have some BDNF from when she collected a bunch of cytokines a while back. So no need to feed those.

It was so so late yesterday after doing an exp and feeding things so I ended up not plating a new batch of organoids. The 3rd batch that has some U-bottom plates actually improved so I kept that one going instead.

Felix:
Sunday:
- take pics of C34#1 d19 at the dissecting scope. Just 1x pic each pushed together at notch 2X or 3X if there's lots of space.
- feed all the v or U-96w plates below. There's media with 0/1/3 uM IWR1e in the red tube rack one shelf below my usual blue one. Note that the batches the same age share some plates, I just kept the names separate for easier keeping track. Use separate tips / reservoirs between cell lines Adapted-Control, C34, and C3.

C34#2 d13 -> split between 1.5v96w with 0/1/3 uM IWR1e

Adapt-Control#1 d13 -> split between 1.5v96w with 0/1/3 uM IWR1e

C34#3 d7 -> 1U96w (split 4 columns each 0/1/3 uM IWR1e) + 3 columns of v96w (No IWR1e)

Adapt-Control#2 d7 -> 10 columns of U-96w (half No IWR1e, half 3uM IWR1e) + 4 columns of v96w (No IWR1e)

C3#1 1.5U96w d7 -> (half plate each 0/1/3 uM

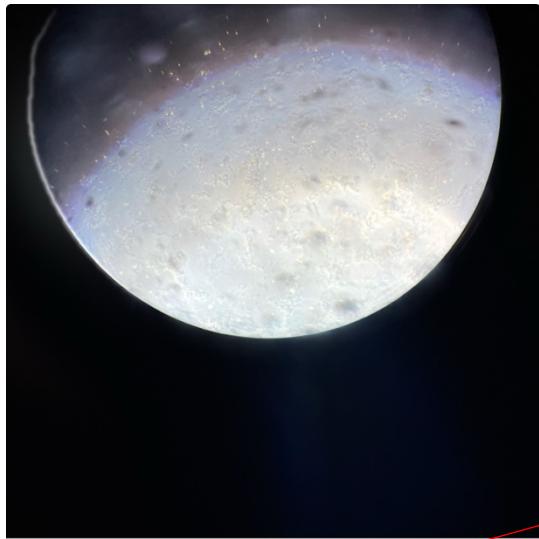
Harout:
Sunday:
- d7 organoid pics on apotome. Open up my previous folders to match the way I've been labeling them. The order they are labeled 1-6 on the plate matches the images 1-6. It's the well to the right of the #s. I label the bottom left off to the side so the pen mark isn't a shadow. Make sure to click 0.45 gamma then just need to move/focus adjust brightness if needed.
- feed all stem cells on MEFs

Monday:
- take d14 organoid pics on apotome. Only bring a couple at a time so they aren't out so long.
- feed all stem cells on MEFs

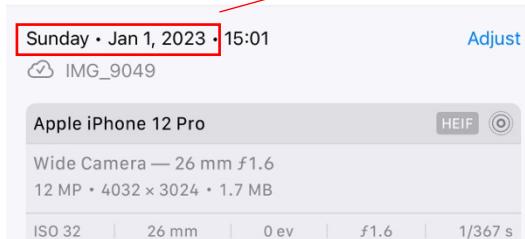
Tuesday:
- feed all stem cells on MEF
- feed the 3x 10cm dishes in the high O2 incubator. Batch C34#1 d21. Aspirate the media, add 8.5ml/dish SASAI N2 +MC. Separate any that are stuck together with the yellow wide bore p200 tips.

I'm back Wednesday night, I can feed any of my things then. Reply if that's clear and if there's anything I might have missed.

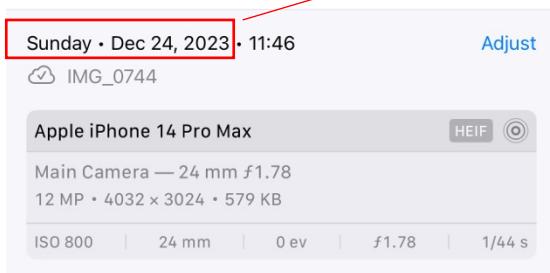
Exhibit I: Examples, without limitation, highlighting patterns of holiday hours worked without receiving compensation



Add a Caption



Add a Caption



Employee Tasks Messages History Log Off Help Timesheet GULESSERIAN,HAROUT KARNIK

Pay Period: 12/25/2022 - 01/07/2023 (History - Adjustments Allowed) B1 ⚡ g0

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPATH ID: 10582324)
Full Acct Unit: NEUROBIO Barg.Unit: RX

History Review

HISTORY

History Status (Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary													Hide		
Hours	Sun 12/25	Mon 12/26	Tue 12/27	Wed 12/28	Thu 12/29	Fri 12/30	Sat 12/31	Sun 01/01	Mon 01/02	Tue 01/03	Wed 01/04	Thu 01/05	Fri 01/06	Sat 01/07	Total
Normal Hours Worked															56.00
Holiday															24.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	80.00	

Paid Summary

Regular Time (REG)		8.00	8.00	8.00					8.00	8.00	8.00	8.00		56.00
Holiday Pay (REG)		8.00			8.00			8.00						24.00

Employee Tasks Messages History Log Off Help Timesheet GULESSERIAN,HAROUT KARNIK

Pay Period: 12/24/2023 - 01/06/2024 (History - Adjustments Allowed) B1 ⚡ g0

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPATH ID: 10582324)
Full Acct Unit: NEUROBIO Barg.Unit: RX

History Review

HISTORY

History Status (Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary													Hide		
Hours	Sun 12/24	Mon 12/25	Tue 12/26	Wed 12/27	Thu 12/28	Fri 12/29	Sat 12/30	Sun 12/31	Mon 01/01	Tue 01/02	Wed 01/03	Thu 01/04	Fri 01/05	Sat 01/06	Total
Normal Hours Worked															48.00
Holiday															32.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	80.00	

Paid Summary

Regular Time (REG)		8.00	8.00	8.00					8.00	8.00	8.00	8.00		48.00
Holiday Pay (REG)		8.00	8.00					8.00	8.00					32.00

Dec 2022



26



S	M	T	W	T	F	S
27	28	29	30	1	2	3
Diana	Angel	Arinnae	Laren	Arinnae	Angel	Diana TC
Natella	Dianna	Dianna	Angel	Marie Cryo	Dianna	Hg
Hg main t	Lauren	Lauren	Marcos - L	Dianna	Marcos - L	Jessie TC
Hg LSM80	Eric cryost	Hg	Piunik	Piunik	Hg	Cendi
SandeepJ	Hg LSM80	Ashok 700	Piunik	Hg		
***	***	***	***	***	***	
4	5	6	7	8	9	10
Diana TC	Arinnae	Arinnae	Arinnae	Arinnae	Diana	Diana TC
Hg main t	Dianna	Hg	Eric LSM80	Diana TC	Hg	Hg LSM80
Jessie TC	Hg	Marcos - L	Seant Cryo	Hg main t	Piunik	Hg main t
Rafael (Zar	Piunik	Piunik	Piunik	Eric LSM80	Seant LSM	
Natella	Jessie TC	Clover	Seant Cryc	Hg cryosta	Piunik	
***	***	***	***	***	Yesica diss	
11	12	13	14	15	16	17
Piunik	Arinnae	Hg LSM80	Arinnae	Arinnae	Arinnae	Zamudio L
Cendi	Diana	Hg main Td	Zamudio L	Rafael (Zar	Seant/Hard	
Natella	Seant Cryo	Cendi LSM	Natella	Cendi LSM	Yesica Ism	
Cendi LSM	Eric LSM80	Hg cryost	Solizic - LS	Zamudio L	Natella	
Hg	Zamudio L	Solizic - LS	Hg main Td	Sandeep/q	Zamudio L	
Jessie Ism	***	Sandeep/h	***		Jessie TC	
18	19	20	21	22	23	24
Natella	Steri-cycle	Youngsun	T/C STERI-	T/C Auto-R	Jessie TC	Christmas
			Hg LSM80	Solizic - LS		
			Hg main Td	Zamudio L		

25	26	27	28	29	30	31
Christmas	Christmas	Solizic - Cr	Piunik	Piunik	Piunik	New Year's
Hg	Hg		Solizic - Cr			
	Jessie TC					
1	2	3	4	5	6	7
New Year	New Year's	Sandy LSM	Sandy LSM	Yesica 700	Natella	Natella
Diane			Yesica Ism	Cendi cryo	Pionik qpc	
Seant TC				Natella	Zamudio L	
				Sandeep/p		



Nov 2023



26



S	M	T	W	T	F	S
29	30	31	1	2	3	4
Hg	Arinnae	Halloween	Ns	Hg	Hg 800	Hg
Eric LSM80	Dianna	Naetella and	Soizic - LS	Adrian	Marie diss	Hg lsm800
Solizic - LS	Lauren	Lauren	Cendi	Cendi & Ne	Cendi	
Adrian	Marcos - L	Dianna	Eric tc	Hg	Yue (mikk)	
Cendi		Marcos - L		Adrian	Soizic - LS	
NS					***	
***	***	***	***	***	***	
5	6	7	8	9	10	11
Daylight S	Cristian LS	Election D	Nilou	Cristian LS	Veterans D	Veterans D
Hg LSM80	Ivan	Cristian LS	Sangmok-	Nilou	Cristian LS	Hg lsm800
Hg	Nilou TC ro	Julia (mikk)	Cristian LS	Natella Iva	Diana	
Hg	Nilou	Hg	Adrian Ism		NS	Nilou
Negien cry		Cendi			***	
***	***	***	***	***	***	
12	13	14	15	16	17	18
Negien	Ivan	Hg Cryo	Soizic - Cr	Hg LSM80	Cristian LS	
Cendi cryo	Adrian	Solizic - Cr	Nilou LSM	NS		
Nilou	Solizic - Cr	Nilou LSM	Nilou	Cristian ls		
Diana	Nilou	Hg	Adrian	Hg		
Yesica Ism	Ivan	Yue (mikk)	Cendi LSM			
Hg/Ns		Hg cryo		***	***	
***	***	***	***	***	***	
19	20	21	22	23	24	25
Cendi LSM	Cristian ls	Adrian 800	Zamudio L	Thanksgiving	Black Frida	Diana
Cristian ls	Hg	Yue (Mikk)	Negien	Hg	Anastasia	Jessie LS
Nilou LSM	Negien	Piunik	Cendi	Adrian 800		
Nilou	Yesica cry	Sandeep/c	Nilou :)			
Yue (mikk)	Solizic - Cr	diana	Cendi LSM			
***	***	***	***	***	***	
26	27	28	29	30	1	2
Adrian 80	Sangmok-	Hg	Nilou	Hg tc	Cristian LS	Hg LSM80
Cendi LSM	Cendi LSM	Sangmok-	Negien	Zamudio L	Nilou	Cendi
Ivan	Adrian 800	sandeep/c	Cendi	Cristian ls	Zamudio L	Diana
Diana	Sandeep/c	Adrian	Cristian (b)		Diana	Jessie TC
Nilou	Hg	Adrian 800				
***	***	***	***	***	***	
3	4	5	6	7	8	9
Diana	Sangmok-	Sangmok-	Hg cryo	Diana	Hg cryo	Diana 800
Diana	Zeiss repa	Negien	Sangmok-	Negien	Negien	
		Negien	Cendi	Angel TC	Sangmok-	Sangmok-
		Nilou	Angel TC	Negien	Negien	Diana
		Negien	Sandeep/C	Eric lsm70	Cendi	
***	***	***	***	***	***	



Employee Tasks | Messages | History | Log Off | Help | Timesheet

Pay Period: 11/12/2023 - 11/25/2023 (History - Adjustments Allowed) B1 ⏪ ↗

GULESSERIAN,HAROUT KARNIK

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPATH ID: 10582324)

Full Acct Unit: NEUROBIO Barg.Unit: RX

History Review

HISTORY

History Status (Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary

Hours	Sun 11/12	Mon 11/13	Tue 11/14	Wed 11/15	Thu 11/16	Fri 11/17	Sat 11/18	Sun 11/19	Mon 11/20	Tue 11/21	Wed 11/22	Thu 11/23	Fri 11/24	Sat 11/25	Total
Normal Hours Worked	8.00	8.00	8.00	8.00	8.00			8.00	8.00	8.00					64.00
Holiday													8.00	8.00	16.00
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	0.00	0.00	8.00	8.00	8.00	8.00	8.00	0.00	80.00

Paid Summary

Regular Time (REG)	8.00	8.00	8.00	8.00	8.00			8.00	8.00	8.00					64.00
Holiday Pay (REG)													8.00	8.00	16.00

Exhibit J: Email proof of me reaching out to Novitch for assistance, but receiving no meaningful response without limitations

3 Messages
Recap

necessary data within the 1-year window that the Federal Government allows us.

Also, can I please try to analyze the data myself? I would like to use the extra \$7,000 in funds elsewhere to improve the lab and my protocol. Eric is willing to guide me through the codes as needed.

Also, I just wanted to mention that Samantha, You, and I are in the latest CIRM Bridges Commercial. Thought that was super cool!

Lastly, I certainly would appreciate another hand in the lab; more specifically, another UCLA student being added & perhaps we can also reach out to CIRM Bridges for second student; certainly the time is ripe for me and I certainly would appreciate the extra helping hands.

Thanks,
Harout

| On Apr 9, 2024, at 12:12 PM. Harout Gulessarian

[See More](#)

Found in Inbox

 BENNETT NOVITCH ✉ 4/11/24
To: Harout Gulessarian >

Hi Harout,

Just to let you know, I am under the gun to submit two NIH progress reports which are both due by Monday, so I am not going to be able to do any work on any of the IP stuff until that is all done. If you can send me what you have updated early-middle of next week, then we can pick up on fixing it up.

Ben

Exhibit K without limitations: Email to Supervisor Bennett Novitch on January 22, 2024, formally addressing the marginalization and exclusion I was experiencing in the workplace, particularly regarding my removal from the HIV project. I requested that Supervisor Novitch take immediate action to resolve these issues and emphasized the significant mental and emotional toll this treatment was having on my well-being.

4 Messages	Request to meet	4 Messages	Request to meet	4 Messages	Request to meet
Back		Back		Back	
 Harout Gulessarian To: BENNETT NOVITCH >	1/22/24				
Hello Ben,		Regarding any information, including the formula, or method of my technique, I believe that the protocol I created, even now as it stands, with nothing more added to the formula/recipe, derives at least some independent economic value [whether actual or potential] from not being generally known to other persons who can obtain economic value from its disclosure [whether now or at a later time].		Certainly I can appreciate your past efforts with TDG regarding +4G, but given TDG handles matters on a case by case system and given laws, rules, and policies are frequently amended and get updated regularly, perhaps I can propose that maybe TDG is best suited to insure we are moving forward with UCLA best practices whatever those may be.	
I am sorry to hear you are under I wish you a speedy recovery and hope to see you in lab very soon. Unfortunately, I am also feeling a bit under myself and would not mind if we meet later in the week. I may also need to step away from lab today after making Eric's organoids to take care of myself.		That being said, I believe efforts are reasonable to maintain confidential my creations at least until my creations/protocol are cleared for non-confidential disclosure by TDG because I believe this is likely TDG/UCLA policy as TDG's main goal is likely how to best protect UCLAs interest.		I think that we should further discuss the HIV project in person, along with focusing on reconciliation and somehow becoming more inclusive & cohesive as a group. I believe it's important for all of us in lab to feel inclusive, and welcomed at the end of the day.	
I am extremely grateful to you for making sure I get my credit for discovering the usage of the molecule & creating the protocol; perhaps you can now understand how much more meaningful that was when you said that, especially given the ongoing anxiety from being marginalized, as members of the lab are continuously non-inclusive making sure that I am denied meaningful opportunities on projects such as the HIV research. Therefore, I am grateful for your reassurance that there will be no missapproriation of my creations, especially from people who have maintained a pattern and practice of marginalization and non-inclusiveness at me.		All in all, I believe we don't lose anything by waiting a small time period to hear at least advisory guidance from TDG as to insure that neither myself, nor you, nor UCLA are victims of any foreseeable misappropriation.		I look forward to meeting with you once both of us have recovered. We have an upcoming meeting with the Spencer/Pyle lab on Wednesday. I need to discuss those results with you as well. Possibly meeting tomorrow evening would be better as I will have some time to put meaningful data together.	
Regarding any information, including the formula, or method of my technique, I believe that the		Certainly I can appreciate your past efforts with TDG regarding +4G, but given TDG handles matters on a case by case system and given laws, rules, and policies are frequently amended and get updated regularly, perhaps I can propose that maybe TDG is best suited to insure we are moving forward with UCLA best practices whatever those		Hope you feel better soon, Harout	

Exhibit L without limitations: Email to Supervisor Bennett Novitch on February 20, 2024, detailing my complaint about being excluded from projects, marginalized, and falsely perceived as hindering lab efforts. I highlighted my attempts to secure university assets and pointed out Supervisor Novitch's absence.

7 Messages	IP disclosure	7 Messages	IP disclosure	7 Messages	IP disclosure
	Harout Gulessarian To: BENNETT NOVITCH >		Moreover, I am also trying to insure that UCLA's legal interest in this is protected and I believe the best practices to do this is by incorporating TDG, because this is precisely what was told to me to do by UCLA. So, I look forward to bringing to market and exploring further research of my accidental discovery and invention ASAP, and doing so using UCLA best practices under the guidance of Associate Vice Chancellor, Chief Intellectual Property Officer, & TDG as I am just following best practices for UCLA rules, policies, and procedures, along with State and Federal laws.		Moreover, because it takes time and effort to recall and retrace my steps of my accidental discovery and invention, which you have been on notice of since last year and every step of the way. I sent an email which incorporated everyone in our lab regarding my efforts to disclose everything to UCLA and to not "hold back" any intellectual property which I accidentally discovered, invented and created, but at the same time for me to do so with the fastest speed possible so that UCLA can protect UCLA's very own legal interest in my accidental invention, discovery, and creation against any noticed misappropriation.
2/20/24	Hello Ben,	2/20/24	Please understand that in the past I attempted to reach out to you for many months regarding both my accidental discovery/invention of the protocol, but the fact remains you were extremely busy or unavailable for months to have a meeting with me.	2/20/24	I don't believe my efforts to protect UCLAs best interest and legal interest in the intellectual property is "holding back" anything by using UCLA best practices to disclose and research my very important accidental discovery, invention and breakthrough, but in fact by incorporating the TDG office I believe that: #1 we are following UCLA policies and procedures and #2 I am in fact accelerating the process of disclosure to our lab and all other UCLA & related parties.
	Yes I am looking forward to our meeting as well. I also had some matters that I want to make sure are on our agenda for tomorrow as they still require a remedy; the ongoing non-inclusiveness against me which I believe, and hope we can ultimately resolve because you mentioned that you and the committee reached out to Jessie about making things more inclusive in the HIV project. I am most certainly looking forward to being apart of the team again, as I especially look forward to be given a meaningful opportunity to participate and promote rather than being denied and marginalised.		Moreover, because it takes time and effort to recall and retrace my steps of my accidental discovery and invention, which you have been on notice of since last year and every step of the way. I sent an email which incorporated everyone in our lab regarding my efforts to disclose everything to UCLA and to not "hold back" any intellectual property which I accidentally discovered, invented and created, but at the same		Looking forward to our meeting, Harout
	Second, I am a bit confused regarding any "holding back" which you referenced because I in fact disclosed my protocol to you and everyone in our lab meeting. I sent an email on 1/30/2024 to everyone in our lab about my disclosure, so I don't believe that there has been any "holding back" whatsoever.				
	Moreover, I am also trying to insure that UCLA's legal interest in this is protected and I believe the best practices to do this is by incorporating TDG.				

Generally speaking, it was only after exercising my legal rights to ensure I was compensated—through actions such as filing complaints with HR, the Office of Ombuds, and Confidential Counseling, becoming a whistleblower, taking healthcare FMLA, and requesting reasonable healthcare accommodations—that Supervisor Novitch began to comment on my working seven days a week. Nevertheless, the fact remains that for 2 years, I consistently worked weekends and nights, with Supervisor Novitch promising that I would eventually be paid. I am now once again making a formal demand for payment for all the work I have completed.

Demotion- The Deceptive Nature of the Formal Record and HR's Bias

Although UCLA's formal records may not show a change in my job title or pay, the reality of my role has been materially diminished in several ways. While HR may view the lack of formal documentation as indicating no "demotion," the substance of my professional responsibilities has been significantly undermined. A constructive or *de facto* demotion might not be overtly documented, but it can still have a profound impact on my career trajectory and professional duties. The demotion that I am referring to is as follows:

Here, Supervisors Novitch uses reductions in my role and responsibilities as de facto based bad faith demotions, as a way to essentially discriminate against my protected class or to punish a whistleblower, among other things. These Constructive Demotions typically involve a reduction in my job duties and Supervisor Novitch attempts to disguise a demotion by simply reducing an employee's responsibilities, or even taking away all of their duties, without changing one's job title (a "constructive demotion" or "*de facto* demotion") in bad faith and in a manner that undermines my ability to perform or progress my career.

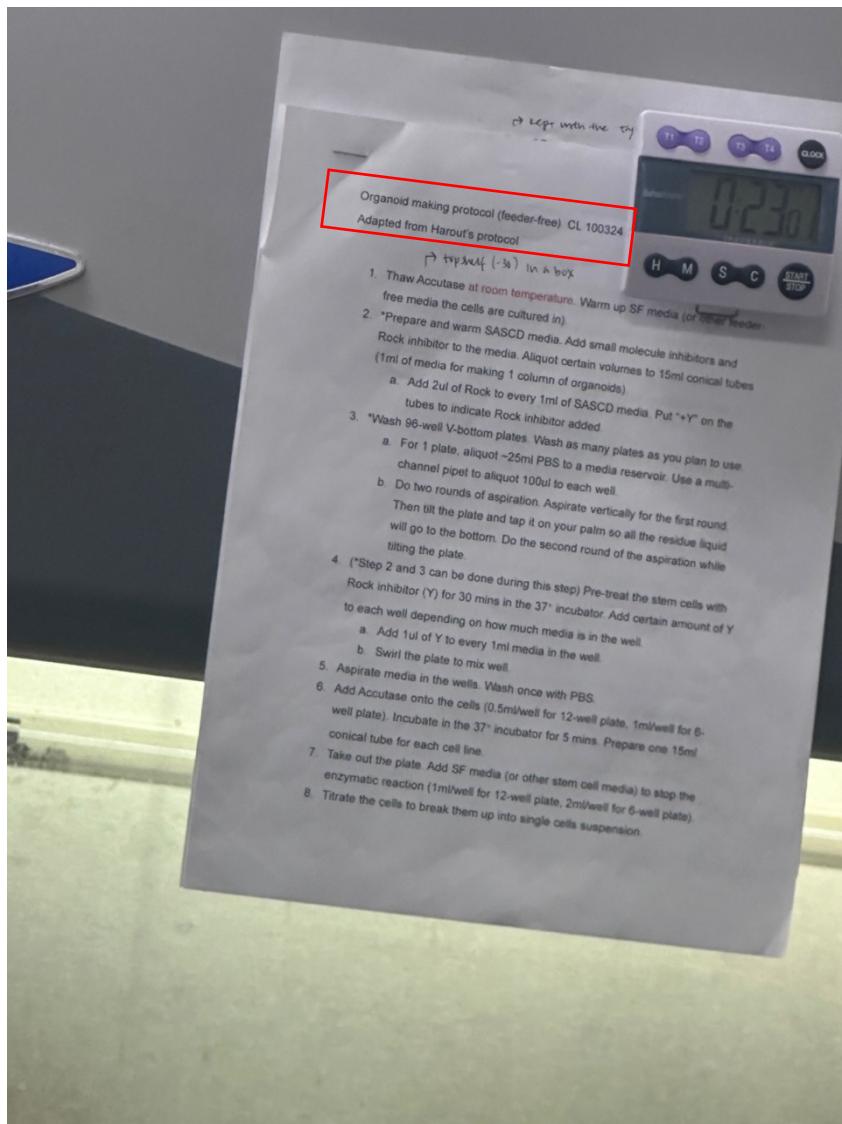
Essentially, **Breach of the implied covenant of good faith and fair dealing** in the context of my employment agreement. Supervisor Bennett Novitch cannot act in bad faith or in a manner that undermines any employee's ability to perform or progress their career, which the evidence below shows this has occurred and is occurring.

In this instance, a breach of the implied covenant of good faith and fair dealing is occurring, and occurred, without limits due to the intentional sabotage of my draft manuscript and Supervisor Bennett Novitch's failure to provide the proper documents for TDG (MTA and Sponsor information; see my draft manuscript of my invention of my protocol forwarded to UCLA TDG) evaluating the impact of employment actions on an individual's professional standing and growth opportunities, particularly in cases of *de facto* demotion in this case, the reduction in my roles and responsibilities constitutes an adverse employment action, regardless of whether there was a pay reduction or job title change. Here, these employment decisions that do not reduce pay or benefits may still qualify as an adverse action because the bad faith acts significantly reduce my career prospects by subjecting me to a less distinguished title or a more menial, routine, and arguably less prestigious position or role in the lab as the evidence shows below.

Additionally, Supervisor Novitch and others involved are acting in bad faith by denying me work privileges and preventing me from obtaining the necessary sign-off on my draft manuscript to prevent my inventor status and prevent TDG from pursuing a patent with my name as inventor, while the Novitch lab is continuing to benefit from my discovery. This deliberate exclusion not only sidelines me from my own projects but also undermines my employment in a significant and material way. By blocking me from formally advancing my research, claiming inventor credit, and not allowing TDG to pursue a patent for my invention, they are intentionally diminishing my role and career prospects. Meanwhile, others in the Novitch lab are continuing to work on and use my intellectual property and advance their careers. As of 1/23/2025, evidence

below shows that my invention is being worked on by others, while I am unjustly precluded, marginalized, and sidelined, which clearly constitutes a reduction in my job duties.

Exhibit M without limitations: Photo evidence, taken in the Novitch lab on January 23, 2025, showing the lab using my invention and actively working on it. The paperwork is directly labeled with the statement “Adopted from Harout’s protocol”.



Prior to taking FMLA, I was actively involved in multiple projects, including my invention, with the understanding that I would continue advancing it upon my return. However, upon my return from FMLA, my responsibilities were reduced to basic tasks, and I was sidelined while others continued to work on my discovery. This deliberate exclusion and reduction in my role were done in bad faith, violating the implied covenant of good faith and fair dealing. These actions intentionally restrict my career advancement, materially harming my professional standing and future opportunities.

Exhibit N: Before whistleblowing, FMLA, and other matters, I worked on numerous projects without limitations

Project 1

NL Neil Lin 11/14/23
To: Marie Cc: BENNETT, ERIC, Harout >

Re: Meeting Follow Up

Hi Marie,

Everything sounds good to me.

Ben, can you specifically comment on items 2 & 4, please?

Thanks!

Neil

[See More](#)



Harout Gulessrian 11/17/23
Hi everyone, We have 118 good XF organoids...

Project 3

OF From: Oliver I. Fregoso >
To: BENNETT NOVITCH >
Cc: Rishi Patel > Jessie Buth >
Harout Gulessrian >
April 2, 2024 at 17:20

Re: iMG meetings - spring quarter

Great, see you all then!

Looks like the new virus is infectious on reporter cells. Rishi is working to quantify it, and is making a backup stock just in case. My only concern is the reporter cells are very easy to infect, so until we have new microglia we won't know for sure how well the virus infects for these assays.

Aaaaannnnndddd he found out that the -80 in our 2+ has a "door defrost"! I am not too happy about that, as it is probably why the virus dies after about a year.

-OF

Project 2

JM From: Jacqueline M. Martin >
To: Daniel H. Geschwind > Michael F Wells >
Robert Damoiseaux > Kitai Kim >
Aparna Bhaduri > Daniel Aharoni >
BENNETT NOVITCH >
Peyman M.D. Golshani > Chongyuan Luo >
Deniz Ata > Hamid T. Chorsi >
Jong-Jin Kim > HyoKyeong Cha >
Mohammad Baig > Kevin Wojta >
Yashika S. Kamte > YAN JIN >
Ramin Ali Marandi Ghoddousi >
Claudia Nguyen > Harout Gulessrian >
Cc: Jenifer Sakai >
April 22, 2024 at 05:21

SSPSyGene Meeting Agenda 4/22/24

Project 4

HC Harry Chen 7/18/24
To: Melissa Cc: BENNETT, Harout >

Re: NSC

Thank you so much! I'll send a followup email the week of 8/12 when you and Harout are back.

-Harry

Project 5



BENNETT NOVITCH ✅

To: Harout Cc: Mark >

4/15/24

Re: Delays

Hi Harout,

Your response has raised a number of concerning allegations. We will now need to have a discussion mediated by our departmental CAO Mark Lucas, who I have cc'd on this message, so that we can once and for all set the record straight as to what I am asking of you, and for you to air your concerns about me and the positions that I am taking.

I will reiterate once more and in very plain terms - what I am asking is for you to do is assist members of my laboratory in their experiments to best achieve the goals of our research. You are specifically paid from funds that we have received from NIH - funded by the American people - to support these research activities. As a staff research assistant, it is part of your job requirement to assist others. At this moment in time, people in the laboratory are encountering difficulties in achieving their goals, and your alternative cell culture methods could potentially help them overcome these bottlenecks. If you continue to refuse to help members of the laboratory in their research efforts, I will have no choice but to conclude that you no longer wish to do your job. This would sadden me greatly.

Please note that none of these concerns affect our previously discussed plans to pursue an invention report submission regarding your serendipitous finding about a small molecule that may improve brain organoid formation and development of a cell culture protocol (based on previous work from my laboratory) that maximizes its impact. You will get credit for your discovery, and I will continue to be enthusiastic about working with you on experiments to determine the mechanisms by which the molecule works. However it is essential to also assess whether the positive benefits of this molecule can be extended to improving problematic cell lines. This would be a major advance for the lab, reinforce the importance of your finding, and further our



Exhibit O without limitations: After whistleblowing, FMLA, and other matters (as of August 20, 2024), there was a complete reduction in job responsibilities. I was being denied access to the lab (August 5, 2024) mid my return and told that I did not have any assignments, despite having taken on every project for the past two years. This situation seems incredibly contradictory, as I made a significant discovery and, at a minimum, have the right to continue my own invention and creation

11 Messages
Back Plan for FF Rett lines  

BN BENNETT NOVITCH 
To: Harout Cc: diana >
8/20/24

Hi Harout,

Here is the game plan to start with:

1. Thaw out the cells that Diana has suggested into Stemflex media. Hopefully viability and growth thereafter will be good. Diana, do you have any ideas about the numbers of cells that were frozen or the split ratio to gauge what size well/plate should be used? I'm guessing 1 well of a 6-well plate?

2. Please also thaw the cell lines that Maria had generated. Put into something small (i.e. a single well of a 12 or 24 well plate?). Monitor for a few days to see if they are viable and if they grow out at all.

3. For the cell in 1, let's try using the new Lipofectamine Stem transfection reagent that I had just purchased. The product information can be found here: https://assets.thermofisher.com/TFS-Assets%2FLSG%2Fmanuals%2FMAN0017080_LipofectamineStem_UG.pdf and a protocol for conducting experiments with StemFlex media conditions is here: <https://assets.thermofisher.com/TFS-Assets%2FBID%2Fmanuals%2Ftransfection-psc-lipofectamine-stem-stemflex-protocol.pdf>. Note that I purchased some fresh Geltrex, Versene, and TrypLE Select so that we could do exactly as they describe. We should already some RevitaCell in the lab.

I suggest that we follow their main instructions testing 4 different transfection conditions for each cell line and plasmid (i.e. two different amounts of Lipofectamine (1 vs 2 uL) with two different amounts of total plasmid DNA (250 vs 500 ng). Remember that we will be mixing two plasmids for each reaction, so this means 125 vs 250 ng for each plasmid.

For plating density, this could also be varied, but I would try to stay on the less dense side knowing that our goal will be to grow out proliferative clones of labeled iPSC for future organoid

From: [Mark Lucas](#) >
To: [Harout Gulessarian](#) >
August 5, 2024 at 17:33

Return to lab

Dear Harout,

We hope this finds you well. We are in receipt of your physician's note, authorizing your return to work on Tuesday, August 7, 2024.

Because Professor Novitch is currently on vacation, we do not have assignments for you to complete this week in the lab. He will return on Monday, August 13, however, and so we are delaying your return date until then. We will pay you for the remainder of this week (Tuesday, August 7 – Friday, August 10), but ask that you do not return to the lab before August 13th.

We look forward to you returning then. Please let me know if you have any questions.

Best,
Mark Lucas
Chief Administrative Officer
Department of Neurobiology

UCLA HEALTH SCIENCES IMPORTANT WARNING: This email (and any attachments) is only intended for the use of the person or entity to which it is addressed, and may contain information that is privileged and confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Unauthorized redisclosure or failure to maintain confidentiality may subject you to federal and state penalties. If you are not the intended recipient, please immediately notify us by return email.

Unfair Performance Evaluations Done in Bad Faith and Their Negative Impact

Although the performance evaluations may not be formally documented with HR this is the actual conduct and practice of what is happening with the net effect of my role and responsibilities as de facto based faith demotions and sabotage, as a way to discriminate against me or to punish for whistleblowing, for taking FMLA, among my other protected class issues. These constructive performance evaluations were arguably done in bad faith and continues to persist which effectively undermines my role and duties pertaining to my employment thus materially and negatively impacting my employment terms.

Allegations of Unfair Performance Reviews and Retaliation done in bad faith

August 19, 2024: Upon my return from administrative leave that I was placed on by the department CAO and HR rep Helen Nguyen in bad faith, I was subjected to a de facto demotion that was communicated to me over zoom on august 15th 2024 and summarized in an arguably false misleading email that does not speak the truth to what was stated. I was removed from all the roles and responsibilities I had held prior to taking FMLA leave, including the brain organoid protocol creation and oversight related to my novel discovery in the lab. Instead, I was relegated to the menial task of being a stem cell feeder and generating reporter lines, a position typically assigned to newcomers rather than an experienced researcher like myself. **This demotion was not based on any performance deficiencies, but rather as retaliation for my whistleblowing.**

The tasks and projects I had previously contributed to still existed and continue to exist to date, but I was deliberately sidelined. For instance, in my return-to-work letter from Neurobiology HR, which had numerous false misleading statements you can see this bad faith act in play when I am being told from HR, I could only work on what Ben tells me to do meaning I can't work on the discovery anymore. I raised my concerns in this instance, yet I never received a response from HR Representative Helen Nguyen, which, arguably, appears to be a recurring pattern when reporting misconduct to management within this department.

Exhibit P without limitations:

"In addition, we would like to remind you that your work should be focused exclusively on collecting and reviewing data from the research experiments assigned to you by Dr. Novitch and, with his direction, assisting others in the laboratory in their research efforts"

HN Nguyen, Helen A. August 16, 2024 at 8:25 AM
Return to Work Details
To: Harout Gulessarian, Cc: Bennett Novitch (bnovitch@g.ucla.edu) <bnovitch@g.ucla.edu>
Siri found new contact info Helen A. Nguyen helenanguyen@mednet.ucla.edu add... 

August 15, 2024

Harout Gulessarian

Dear Harout,

This letter is to memorialize our conversation this morning regarding your return to work in the lab of Ben Novitch in the Department of Neurobiology. As discussed, you will be returning to onsite work on Monday, August 19, 2024. We will be meeting in Dr. Novitch's office in 66-200 CHS at 1 p.m. on Monday, August 19, 2024 to review work assignments for the coming week.

As discussed, we will be setting your regular work schedule as per your request to Monday through Friday, 7:00 a.m. until 3:30 p.m. (to include a 30 min meal/rest break in the middle of the day). This new schedule will not require any after-hours or weekend work; in the rare event after-hours or weekend work is required, you will be compensated accordingly for these additional hours.

You asked for accommodations. You asked to have a stress-free environment. While it is impossible to ensure that any environment is completely stress-free, we will make every effort to reduce stress as it arises. We would ask that you alert Dr. Novitch when stressful situations for you arise. You also asked for a completely remote and flexible work schedule. Given the onsite lab work that needs to be performed, the work will need to be conducted fully onsite. Similarly, we cannot at present offer any flexible work schedules. Please be clear that any work you perform will need to be conducted onsite.

If you are unable to meet this onsite work, please let us know and we will ask a disability coordinator to review your case.

In addition, we would like to remind you that your work should be focused exclusively on collecting and reviewing data from the research experiments assigned to you by Dr. Novitch and, with his direction, assisting others in the laboratory in their research efforts

We look forward to your return to the lab and continued outstanding contributions to our research endeavors.

Best wishes,

Ben Novitch, Ph.D.
Helen A. Nguyen, MBA

To which I objected Helen's statements below without limitations:

“...The directive to focus exclusively on assigned research tasks raises important questions. I would like to understand the rationale behind the restriction on working on my own invention/discovery during my time in the lab.‘

“I have rights as a creator and inventor to discoveries and accidental mistakes I made, which led me to disclose the information to TDG. Ben Novitch did not instruct me to make the accidental mistake of using the special molecule, nor did he have a say in the protocol being presented. In fact, the truth is that there are numerous emails from Ben to me asking me (Harout) to share the protocol with numerous parties including himself, and individuals outside of our immediate lab prior to any safeguarding done from UCLA TDG. The Novitch lab has its own protocols, but my protocol did not exist, and my accidental discovery did not exist in the lab or anywhere in the world prior to September 11, 2023, when I created, discovered, and invented a groundbreaking scientific advancement. Therefore, my inventor and creator interests cannot just be muted without notice or a meaningful opportunity to be heard. While the school owns the IP, I retain inventor/creator rights to my discoveries.”

Exhibit Q without limitations:

☆ HG Harout Gulessserian August 19, 2024 at 12:58 PM
Re: Return to Work
To: Nguyen, Helen A., Bcc: Vera Moubayed Details

Delete | Back | Forward | Reply | Print | 1v

Dear Helen,

Thank you for your email summarizing our discussion regarding my return to work. I appreciate the time and effort taken to outline these details. Though, this requires objecting, as I make no waivers, no admissions and I reserve all rights, because, I must address a few inaccuracies in the summary to ensure that all parties are aligned and that there is no misunderstanding moving forward:

1 Working hours Schedule:

The schedule of 7:00 a.m. to 3:30 p.m. mentioned in your email does not reflect our agreement. While this was an accommodation requested by my doctor, it was denied by Ben in Friday's meeting. During our conversation, I was informed that my schedule would need to align with Dr. Novitch's hours, which are from 9:00 a.m. to 6:00 p.m. Please confirm whether this remains the expectation, or if the 7:00 a.m. to 3:30 p.m. schedule will now be respected as you indicated.

2 Remote Work:

The statement regarding my request for a "completely remote and flexible work schedule" is not accurate. At no point did I request to work entirely remotely. My request was specifically for the option to perform certain tasks remotely, such as assembling figures, which is a practice currently permitted for other members of the lab. I ask that this be accurately reflected in any official documentation. Additionally, I would like to note that I have been capable of performing my job since August 6th, which was my official return date from FMLA. However, I have since been placed on administrative leave without any accompanying paperwork, or documentation.

3 Research Focus:

The directive to focus exclusively on assigned research tasks raises important questions. I would like to understand the rationale behind the restriction on working on my own invention/discovery during my time in the lab. Clarification on this point is crucial to ensure that the Novitch lab is fully compliant with institutional policies and expectations.

I have rights as a creator and inventor to discoveries and accidental mistakes I made, which led me to disclose the information to TDG. Ben Novitch did not instruct me to make the accidental mistake of using the special molecule, nor did he have a say in the protocol being presented. In fact, the truth is that there are numerous emails from Ben to me asking me (Harout) to share the protocol with numerous parties including himself, and individuals outside of our immediate lab prior to any safeguarding done from UCLA TDG. The Novitch lab has its own protocols, but my protocol did not exist, and my accidental discovery did not exist in the lab or anywhere in the world prior to September 11, 2023, when I created, discovered, and invented a groundbreaking scientific advancement. Therefore, my inventor and creator interests cannot just be muted without notice or a meaningful opportunity to be heard. While the school owns the IP, I retain inventor/creator rights to my discoveries.

This is precisely why we sign the patent acknowledgment agreement. Nowhere in that agreement does it state that the PI owns the intellectual processes that led to the creation just because that individual is employed in the PI's lab. As I mentioned earlier, I made a discovery through the accidental usage of a molecule in the Novitch lab. The school deserves its rights to the resulting intellectual property, just as I deserve my rights as the creator, inventor, and discoverer.

I trust that these clarifications can be addressed promptly.

Sincerely,
Harout Gulessserian

[See More from Nguyen, Helen A.](#)

Rather than allowing me to continue and advance the work I had originally been involved in, including my novel discovery, Supervisor Bennett Novitch assigned me to the RETT syndrome project—the very same project that Natella Baliaouri (graduate student) and Diana Ibrahim (SRA) are working on. Natella Baliaouri is the same individual who sent me a threat via Slack on February 6, 2024, threatening to steal my work.

Exhibit R without limitations:

The screenshot shows a Slack message interface. At the top, there's a header with a blue user icon, the name "Natella Baliaouri", and "3 tabs". Below the header, the date "Feb 6th" is displayed. The message itself is from "Natella Baliaouri" at 5:58 AM, with the text "Harout" and two lines of text: "Please send out the protocol" and "Or else I will have to steal it somehow".

Natella Baliaouri 5:58 AM
Harout
Please send out the protocol
Or else I will have to steal it somehow

Here Bennett is asking me to generate the cell lines for Natella Baliaouri's project because their previous attempts in doing so failed, and of course my attempts would prove another story further below in this memorandum.

Exhibit S without limitations:

BN BENNETT NOVITCH August 20, 2024 at 10:29 AM
Re: Plan for FF Rett lines Details
To: Harout Gulessarian, Cc: diana Ibrahim

Hi Harout,

Here is the game plan to start with:

1. Thaw out the cells that Diana has suggested into Stemflex media. Hopefully viability and growth thereafter will be good. Diana, do you have any ideas about the numbers of cells that were frozen or the split ratio to gauge what size well/plate should be used? I'm guessing 1 well of a 6-well plate?
2. Please also thaw the cell lines that Maria had generated. Put into something small (i.e. a single well of a 12 or 24 well plate?). Monitor for a few days to see if they are viable and if they grow out at all.
3. For the cell in, let's try using the new Lipofectamine Stem transfection reagent that I had just purchased. The product information can be found here: https://assets.thermofisher.com/TFS-Asets%2FLSG%2Fmanuals%2FMAN0017080_LipofectamineStem_UG.pdf and a protocol for conducting experiments with StemFlex media conditions is here: <https://assets.thermofisher.com/TFS-Asets%2FBID%2Fmanuals%2Ftransfection-psc-lipofectamine-stem-stemflex-protocol.pdf>. Note that I purchased some fresh Geltrex, Versene, and TrypLE Select so that we could do exactly as they describe. We should already have some RevitaCell in the lab.

I suggest that we follow their main instructions testing 4 different transfection conditions for each cell line and plasmid (i.e. two different amounts of Lipofectamine (1 vs 2 uL) with two different amounts of total plasmid DNA (250 vs 500 ng). Remember that we will be mixing two plasmids for each reaction, so this means 125 vs 250 ng of each plasmid.

For plating density, this could also be varied, but I would try to stay on the less dense side knowing that our goal will be to grow out proliferative clones of labeled iPSC for future organoid experiments. It might make sense to vary the seeding density a little (i.e. create 3 sets of 4 wells with each set having a higher or lower number of cells than the starting number that they suggest- their Stem Flex protocol says to start with 50,000 cells per well for a 24-well plate, but you could try plating 30,000/well, 50,000/well, and 70,000/well). Proceed with transfecting the set of cells that is about 30% confluent at the time of the experiment. You could try transfecting all wells to empirically see which conditions give the best results, but that will create a lot more work, and I was hoping to keep things as simple as we can.

4. For the Control/WT cell line, the plan is to label these with CAG-EGFP expression and MECP2 Mutant line with CAG-mCherry by co-transfected the combination of either the combination of the CAG plasmids (AAVS1-Pur-CAG-EGFP or AAVS1-Pur-CAG-mCherry) with the Cas9 producing plasmid eSpCas9-No_Flag_AAVS1_T2. The plasmids that Maria and I prepared are as follows:
eSpCas9-No_Flag_AAVS1_T2 (0.53 ug/uL)
AAVS1-Pur-CAG-EGFP (3.82 ug/uL)
AAVS1-Pur-CAG-mCherry (4.32 ug/uL)

I can show you where these plasmids are stored in the -30 freezer.

I suggest that you take these stocks of DNA and dilute each one with TE to make a 250 ng/uL working solution. This will simplify and help improve the accuracy of the amounts of DNA you mix, as you'd be adding 1 or 2 uL of each plasmid to the transfection mix. I would use a 2.5 uL rather than 10 uL pipettor to improve accuracy when making these mixtures.

5. Please follow the manufacturer's suggestion of adding 0.5 mL of Opti-MEM medium with Revitacell supplement just before adding the DNAs, and adding 0.5 mL of room temperature StemFlex media 4 hours after the transfection mixture is added to the cells.
6. Remove and replace media with 0.5 mL fresh StemFlex the next day. If the cells start to reach 85% confluence, they will need to be passaged.
7. Fluorescence should start to become visible within the first 24 hours after transfection, but will likely increase even more after 48 hrs post transfection. Please document the overall success of each condition that you try, ideally with pictures on the apotome for select examples. You may need to use a 20x LD objective to be able to see some of the fluorescence, particularly the mCherry as we Cy3 filters on our microscopes which is not optimally tuned for the spectral properties of mCherry.
8. Let's discuss what you see and then decide from there how we proceed. My thinking is that if the efficiency is high (>15%, ideally higher), we could get away with isolating colonies without any need for puromycin selection- essentially we would passage the cells and try to plate a single cell/well density into 96 well plate (Geltrex coated as you would for the stemflex growth conditions). And monitor over the next few days to see if you get isolated colonies of GFP/mCherry positive cells growing. We would then continue to propagate and isolate a few colonies with the best morphologies for expansion, freezing, and testing in organoid formation.

If the efficiency is not very high (<15%), we will need to use puromycin selection to enrich for the transfected genome modified cells. I would plate cells at moderate density, and wait until the next day before adding puromycin. Selection should be for 2-3 days. We can talk at that time about how to best go about isolating the surviving clones, either by picking colonies manually, or using the procedure of plating at single cell density and propagating individual clones that are expressing the fluorescent proteins and showing good morphologies.

Happy to discuss more details about this plan as needed.

Ben

Instead of furthering my own contributions to the lab, which Supervisor Dr. Bennett Novitch had previously acknowledged on April 15, 2024, and made admissions of my "serendipitous finding", I got punished for blowing the whistle among being punished for other protective class matters. On April 15, 2024, Bennett Novitch made the following statements without limitations:

"Please note that none of these concerns affect our previously discussed plans to pursue an invention report submission regarding your serendipitous finding about a small molecule that may improve brain organoid formation and development of a cell culture protocol (based on previous work from my laboratory) that maximizes its impact. You will get credit for your discovery, and I will continue to be enthusiastic about working with you on experiments to determine the mechanisms by which the molecule works."

Exhibit T without limitations:



BENNETT NOVITCH

Re: Delays

To: Harout Gulessarian, Cc: Mark Lucas

April 15, 2024 at 9:56 AM

Details

Siri found new contact info Bennett Novitch bnovitch@g.ucla.edu

[add...](#)

Hi Harout,

Your response has raised a number of concerning allegations. We will now need to have a discussion mediated by our departmental CAO Mark Lucas, who I have cc'd on this message, so that we can once and for all set the record straight as to what I am asking of you, and for you to air your concerns about me and the positions that I am taking.

I will reiterate once more and in very plain terms - what I am asking is for you to do is assist members of my laboratory in their experiments to best achieve the goals of our research. You are specifically paid from funds that we have received from NIH - funded by the American people - to support these research activities. As a staff research assistant, it is part of your job requirement to assist others. At this moment in time, people in the laboratory are encountering difficulties in achieving their goals, and your alternative cell culture methods could potentially help them overcome these bottlenecks. If you continue to refuse to help members of the laboratory in their research efforts, I will have no choice but to conclude that you no longer wish to do your job. This would sadden me greatly.

Please note that none of these concerns affect our previously discussed plans to pursue an invention report submission regarding your serendipitous finding about a small molecule that may improve brain organoid formation and development of a cell culture protocol (based on previous work from my laboratory) that maximizes its impact. You will get credit for your discovery, and I will continue to be enthusiastic about working with you on experiments to determine the mechanisms by which the molecule works. However it is essential to also assess whether the positive benefits of this molecule can be extended to improving problematic cell lines. This would be a major advance for the lab, reinforce the importance of your finding, and further our research productivity. Everyone would win in this scenario. It is inexplicable to me that you are continuing to be an obstructionist on this point and are endangering our previously good working relationship and raising tensions across lab members.

I would also like to clarify that our obligations are not to TDG and its leadership, it is to the NIH, the American taxpayer and patient needs. TDG's primary role is to provide a service to our University in helping us commercialize ideas and tangible property. The University does not mandate use of their services, and they have no authority over our research.

Mark Lucas is unfortunately out of town at a conference this week, so the earliest that we could have this mediated meeting will be Monday April 22. I would like to put forth a suggested time of 9:00 am if it works for Mark too. Please let me know if this time is acceptable.

Ben

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

Phone (office): 310-794-9339
Phone (lab): 310-825-7565
Fax: 310-825-2224
Email: bnovitch@ucla.edu
Web: <http://novitchlab.com>

Since my return and the commencement of my new assignment, a pattern of undermining my work has emerged, involving deceptive practices such as the wrongful assignment of tasks and intentional sabotage, all aimed at perpetuating a narrative of poor performance on my part. This coupled with the multiple instances where Novitch falsely reported my supposed absences to HR, despite having written and photographic evidence that I was present on time and fulfilling my scheduled hours.

On three separate occasions, my cell cultures were not properly maintained over the weekend by other team members, leading to cell death and the loss of an entire month's worth of work. Meanwhile, their own cell lines were consistently maintained without issue. This was not only anticipated but something I took proactive measures to avoid, which is why I felt pressured to work seven days a week to ensure my work was properly maintained. Unfortunately, when I reduced my work hours and began focusing on rallying the group's efforts, my predictions of poor performance evaluations came true. I was held accountable for others' shortcomings and unfairly blamed for obstructing the progress of the lab.

Exhibit U without limitations:

☆ HG Harout Gulessarian October 9, 2024 at 8:14 AM

Cell viability: Weekday v Friday to Monday observations To: BENNETT NOVITCH

Hi Ben,

I want to re-emphasize a critical issue regarding cell viability. While the cells receive proper care during the weekdays, there is a noticeable drop in survival rates from the weekend to Monday. I've attached photos that illustrate the differences between Friday and weekend conditions.

Thank you for your time and assistance on this matter.

Best regards,

Harout Gulessarian

Example 2 Friday Healthy Cells 9/27/2024

Friday Healthy cells prior to departure 9/17/2024

Example 2 Weekend Cell Death 9/30/2024

Weekend cell death Example 1 on Monday 09/20/2024

The image block contains several panels of microscopy images and computer screenshots. At the top left is a circular profile picture of Harout Gulessarian with the initials 'HG'. Next to it is the name 'Harout Gulessarian' and the date 'October 9, 2024 at 8:14 AM'. Below this is the subject line 'Cell viability: Weekday v Friday to Monday observations' and the recipient 'To: BENNETT NOVITCH'. A horizontal toolbar with various icons follows. The main body of the email contains a message from Harout to Ben, followed by four sets of images. Each set includes a title in yellow text above the images. The first two sets show healthy cell cultures on Friday, while the last two show cell death on Saturday and Monday respectively. The images include both brightfield and fluorescence microscopy views, as well as computer screens displaying software interfaces.

Without limitation, another example of bad faith occurred in late October (29th, 2024; *Exhibit T*) when a discrepancy was found in the protocol for an experiment I was asked to carry out in early November (2nd, 2024; *Exhibit U*). Supervisor Novitch instructed me to use the CAS9 plasmid, despite the CIG plasmid being required for the experiment. This error meant that the experiment was doomed to fail, as the correct plasmids were not provided.

On November 12th, Supervisor Novitch sent me his modified version of the protocol, clearly showing that he had used the correct CIG plasmid, not the CAS9 plasmid. This misdirection and the expectation that I could produce results with incorrect materials is an example of bad faith conduct, as it intentionally set me up for failure, undermining my ability to successfully complete the experiment and continue advancing my work. Such actions align with an ongoing pattern of misconduct designed to hinder my progress and limit my professional contributions. Once again, directions were provided with key ingredients omitted—this occurred on numerous occasions, not just once (see evidence below).

Exhibit V without limitations:



Ben Novitch

Oct 29th, 2024 at 11:46 AM

To accelerate neuron formation, transfect with a combo of two plasmids, pCS2+mNeuroD2 and pCS2+mE12, which will drive neurogenesis. A suitable control would be the same vector with a nls-lacZ gene, pCS2+nLacZ.

If you use these, I would mix them as follows with the AAVS1-Syn1-dTomato and eSpCas9-No_Flag_AAVS1_T2 plasmids as follows: assuming you're aiming for 500 ng DNA in total:
125 ng AAVS1-Syn1-dTomato
125 ng eSpCas9-No_Flag_AAVS1_T2
125 ng pCS2+mNeuroD2
125 ng pCS2+mE12

for a control mix (this is optional- it would only be to demonstrate that any induced neurons are coming from the transfection of NeuroD2+E12, and not just the change to differentiation media)
125 ng AAVS1-Syn1-dTomato
125 ng eSpCas9-No_Flag_AAVS1_T2
250 ng pCS2+nLacZ

1-2 days after transfection, switch the wells to neural differentiation media: DMEM/F12 with 1xB27 (-RA), 1xN2, 10 uM SB4, 2.5 nM dorsomorphin (or use LDN), 3 uM iWR1e for 3 days. After that switch to DMEM/F12 with 1xB27 (-RA), 1xN2 with BDNF, CNTF, and GDNF. In principle, neurons should start to form within 3-5 days, and should be capable of activating the Syn1-dTomato reporter, irrespective of whether or not it is stably integrated into the cells.

Exhibit W without limitations:

BN

BENNETT NOVITCH

Results with transfection with NeuroD2

To: Harout Gulessserian

Inbox - iCloud November 12, 2024 at 10:31 AM

Hi Harout,

Here are more details about how I had done my transfection of the hiPSC with the neurogenic transcription factors and what I was seeing in these experiments so that you can see if there are any differences from what you tried.

I started with the KOLF2.2J cells that you had transfected with AAVS1-Puro-Syn1-dTomato and put through puromycin selection. My hope was that I might see the reporter become activated as the cells were driven to become neurons.

The cells were about 70-80 confluent at the time of transfection. As you had plated these in a 12 well plate, I scaled up the volumes based on what we had previously done with the 24 well plates

Reagent	Rxn 1A	Rxn 2A	Rxn 3A	Rxn 4A
Optimum	46	46	46	46
Lipofectamine Stem (uL)	2	2	2	2
total	48	48	48	48
Optimem	46	46	46	46
pCS2nLacZ (200 ng/uL)	4.10		4.10	
pCS2+mNeuroD2 (200 ng/uL)		2.05		2.05
pCS2+mE12 (200 ng/uL)		2.05		2.05
PCIG (100 ng/uL)	1	1	1	1

Both A and B mixtures were prepared and the contents of B were added to contents of A, and let sit for 10-15 min.

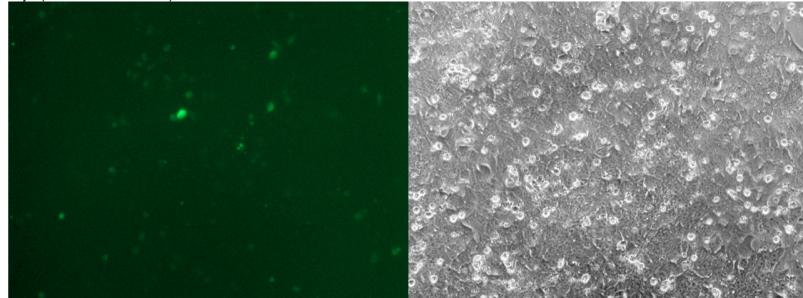
After 3 hrs, I added 1 ml of differentiation media to each well.

This differentiation media included:

DMEM/F12 (8 ml)
1x N2 supplement (100X), 0.8 ml
B27 without vit A (50X), 1.6 ml
2.5 μM dorsomorphin (DM) (2.5 mM stock)
10 μM SB431542 (10 mg/ml stock)
3 μM? INR1E (I used 0.123 of the drug per ml based on Cendi's instructions- I think this should give a 3 uM final concentration

The following day I removed the media and replaced with fresh differentiation media.

Day 1 (~24 hrs after transfection) nLacZ transfected:



This was yet another direct attempt to falsify the narrative surrounding my work, particularly since **the failure of the experiment was caused by the omission of crucial materials—an omission that was only known to those controlling the protocol and the resources**. The plasmid necessary for the experiment wasn't provided to me until January 15, 2025, two months **after** the initial attempts, and long after I had been wrongly accused of failing to execute the experiment. This delay, paired with the intentional acts to alter my work, highlighted a clear pattern of misconduct. I was forced to send Supervisor Bennett Novitch an email questioning the discrepancies in the protocol he had provided on October 29, 2024, and November 12, 2024. Once again, I received a different protocol, this time with missing items and incorrect values, which would prevent the experiment from working unless the right components and proper quantities were used. These repeated errors and intentional omissions serve as clear evidence of bad faith actions designed to undermine my credibility and sabotage my progress.

Exhibit X without limitations:

"For example, the initial protocol you provided via email on 11/2/2024 called for 1uL of the 100ng/uL CIG plasmid, which you only handed to me yesterday (1/15/2025). Additionally, the DMEM-based media used in the previous experiment contained different components (i.e. Dorsomorphin) compared to the current experiment, which specifies the supplemented N2B27 media with Iw1Re and SB4 only. Around noon yesterday, you confirmed that this discrepancy was on your end, not mine. As a result, I had to switch to N2S media with the addition of + B27 without vitamin A into that media. These inconsistencies in both the protocol and the materials are exactly what is preventing me from following a consistent and reproducible procedure."



Harout Gulessserian

Current Experiments

To: BENNETT NOVITCH, Bcc: Nguyen, Helen A.

Sent - iCloud January 17, 2025 at 10:45 PM



Hi Ben,

I noticed several ongoing critical issues that have impacted my ability to progress in the project you currently have me working on which I suspect might not be assigned to me after I get it to work, as is the pattern with all other projects that I have participated in thus far. I want to address these matters in hopes that they be resolved to ensure both the integrity of the project and my professional development are respected.

The first issue I would like to highlight is the persistent discrepancies in the experiment protocols and materials, which have made it virtually impossible for me to standardize the procedure. These inconsistencies seem to set me up for failure. As you are aware, during my previous attempt, one of the plasmids required for the experiment was not provided to me, which made it unreasonable to expect the experiment to proceed as planned. Now, in the current set of experiments, I am encountering further discrepancies that are once again beyond my control.

For example, the initial protocol you provided via email on 11/2/2024 called for 1uL of the 100ng/uL CIG plasmid, which you only handed to me yesterday (1/15/2025). Additionally, the DMEM-based media used in the previous experiment contained different components (i.e. Dorsomorphin) compared to the current experiment, which specifies the supplemented N2B27 media with Iw1Re and SB4 only. Around noon yesterday, you confirmed that this discrepancy was on your end, not mine. As a result, I had to switch to N2S media with the addition of + B27 without vitamin A into that media. These inconsistencies in both the protocol and the materials are exactly what is preventing me from following a consistent and reproducible procedure.

I hope these discrepancies do not negatively affect the results of the experiment, especially given the tight deadline for your grant proposal. I simply want to ensure that the data is generated and that the experiment proceeds smoothly, so I feel it is important to bring these issues to light, as they could potentially delay our results.

For your records, I washed each well with PBS approximately 20 minutes past noon on 1/16/2025 per your directions and swapped to N2Sasai media + Iw1RE + SB4 + B27 without vitamin A.

As a reminder, I also re-shared my successful PCR results with you in the main lab yesterday, which I am happy were positive and mostly aligned with the expected outcomes that you reconfirmed. You shared your results, where you observed the correct bands, albeit with additional bands which did not present in my samples to which you tried the primer sets separately instead of a trio. Your PCR results further confirmed another 2 potential Hets. You noted that dTomato Clone 1, Clone 4, Clone 7, and Clone 14 I created were likely Hets based on your PCR attempt. It's good to see that we could come to a common agreement about the clones, specifically with ~3-4 being Hets.

Aside from the positive developments that I wish to continue presenting, I keep facing ongoing setbacks due to factors outside of my control. I am the one doing the work and generating results, yet my contributions are constantly and consistently overlooked or handed off to others without proper acknowledgement or notice. Worse, I am blamed for things that go wrong, which is both unfair and unacceptable. Regardless of what noise revolves around me, I am eager for progression and growth for the experiments that I partake in.

In fact, I know team members are speaking poorly of me because this was reported to me by a person with higher authority who heard it first-hand. I want to be clear: I am fully committed to the success of this project (provided you let me stay on this time) but I cannot tolerate a working environment where my efforts are not recognized and where I am prevented from presenting my results, or receiving due credit and work privileges that I rightfully deserve – especially when I see others benefitting from these same privileges.

To illustrate how this feels, I will reiterate what I told you in the main lab that I would liken it to being a baseball player who has hit a home run, running around the bases, and just as I'm about to cross the final base to score my points, my legs are broken, preventing me from completing the task and getting the recognition I've earned. I've put in the hard work and achieved success, but I'm being stopped from finishing the process due to factors beyond my control which I have repeatedly asked to cease.

Interestingly, I recently read a piece on Moana 2 and its "earworm" of a song "How Far I'll Go." Though not my typical source of inspiration I find that regardless of "lofty titles" we are encouraged to strive to go beyond any "ceilings that may impede us". All I ask is for a fair and equal opportunity in the lab instead of roadblocks that are placed to dampen my scientific standing on paper.

Ideologies aside, will you kindly provide a written standardized protocol for the next steps of the experiment so I can move forward with this assignment given I am provided the opportunity to continue working on what I have accomplished.

Lastly, Weekend and Holiday Feeding on Monday 1/20/2024:

I will return to the lab on Tuesday after the weekend, I have made three pre-made 6-well Matrigel plates and left the media (SF media and N2S media + supplements) out for the weekend. The Google document has been updated with the current experiments and what was needed to be done for Saturday. I uploaded this around 3:00pm today see images below and find all information here on the shared google document.

Thanks for your time.

Kind regards,

Harout Gulessserian

Another bad faith act was on November 22, 2024, when I faced another unfair performance evaluation, this time in bad faith, when Supervisor Bennett Novitch falsely accused me of not meeting performance standards. He attempted to discredit me by sending incorrect data via email, which was actually from a different experiment. Supervisor Novitch and some lab members had intentionally deviated from the protocol I provided, then shifted the blame onto me for their mistakes. This action was part of a pattern to create a misleading narrative about my performance, which could have been used against me had I not been able to provide evidence to refute their intentional bad faith acts. While I can defend myself with evidence, these retaliatory and bad faith actions continue to undermine my professional standing.

Exhibit Y without limitations: Novitch exaggerates the quality of my work in an attempt to intentionally undermine my performance despite my having followed the instructions he provided.

BENNETT NOVITCH
Re: Harout sick
To: Harout Gulessarian, Cc: Nguyen, Helen A.

November 22, 2024 at 6:51 PM

Details

Hi Harout,

I am following up on your email earlier today regarding your need to go home due to feeling ill and your brief update to me on lab work left undone. I have many concerns about the manner in which you have passed on what appears to be a mountain of cell culture work for others to deal with, with little forewarning or even clear instructions for what needs to be done. The manner in which the work was handed over, the status of the experiments and cells, and your lack of communication is concerning.

Specifically, the lack of details shared in what is supposed to be done in your absence is disappointing. You asked for cells "needing to be differentiated." Anyone in the lab covering for you would not know what they are supposed to be doing with such vague instructions. Likewise with, "These are the 16 clones of potential tomato positive clones. They need to be collected over the weekend once expanded." What do you mean by "collection," and expanded how? You need to be much more specific as it could be interpreted in multiple ways. This is a pattern; I have heard from others in the lab that you have similarly dumped large amounts of work onto them to do the weekend feedings, without clear instructions. I need you to more clearly and thoroughly communicate what needs to be done if you are out.

You also did not prepare materials to help others in doing the weekend passaging and feeding - preparing plates for the expansion, preparing the differentiation media, etc. Some of these things could be done well in advance to minimize the workload for others.

There are also no records of what has been done with the cells at each step in your experiments. Previously, you were sharing daily updates with me on google doc as to what was going on with the cells, what you did each day, and a list of what was upcoming. This was helpful. But you have since stopped doing this and I have little idea what you have been doing and the status of these experiments. Instead of walking me through things step by step as one usually does, you are just telling me that the cells are looking great.

Most disturbingly, I looked at your cells today and they are not great. In fact, I am horrified by the health of many wells of the cells that you have been growing and asking me/others to spend hours this weekend passaging. Many of the stem cell colonies are brown and clearly differentiated, which compromises their usefulness for future experiments. Many of the wells are also dense with large colonies that should have been broken apart and passaged days ago for optimal health of the cells. See attached images. This not just my assessment, I had others look at the plates, and they similarly thought that many of wells are badly compromised- to the point of being useless. I also learned that others who you had asked to feed your cell in past times had similarly noticed that your colonies were often more dense and brown than is advisable when doing stem cell experiments, so this is not a one-off thing. This stands to set us back weeks and prevent timely progress on the labs' research goals.

As I mentioned, I am away next week. I'd like to set up a meeting upon my return to discuss.

Ben

Here are a few of the many examples of the overgrown, clearly differentiated cells from your plates. The plate that you referred to as ") Kolf2.2J FF Tomato clones 1-16 and cherry clones 1-6 (media needs to be changed on Saturday)" is pretty much worthless as almost all wells look like these.

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

Phone (office): 310-794-9339
Phone (lab): 310-825-7565
Fax: 310-825-2224
Email: bnovitch@ucla.edu
Web: <http://movitchlab.com>

Exhibit Z without limitations: Emailing clear and direct instructions to Novitch to demonstrate effective communication and my attempt to delegate tasks appropriately.

Harout Gulessserian
To: BENNETT NOVITCH >
11/22/24

Harout sick

Hi Ben,

I need to take the rest of the day off as I'm feeling under the weather. However, I was able to come in this morning and feed/passed all the batches. Please see the attached image for details.

Red highlights = 2nd shelf, right side. Please do not move these as they were passed at 7:45 AM.
Plate 1) Kolf2.2J FF Tomato clones 1-6 and cherry clones 1-6 (media needs to be changed on Saturday)
Plate 2) Bw of LacZ & Bw of E12 Neurod2. These need to be differentiated into neurons Saturday.

Exhibit AA without limitations: Email and document proof and rebuttal regarding the false accusations, for which I took extra steps to document and back up with images, anticipating that false accusations might be made against me—especially during times when my physical health was taking a concerning toll.

From: Harout Gulessserian >
To: BENNETT NOVITCH >
Cc: Helen A. Nguyen >
Bcc: Mark Krause >
Discrimination Prevention Office >
Shelly Frohrup >
November 23, 2024 at 08:43

Re: Harout sick

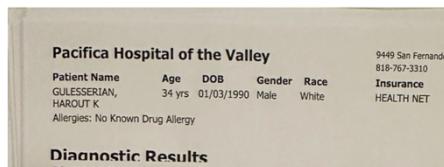
Attachment
No longer available as of Dec 23, 2024

Dear Ben and Helen,

Please see the attached document for my response to this email.



Regards,
Harout Gulessserian



2. The "Mountain of Work" I Left Behind:

You claim I left "a mountain of work" for others to handle. This is not only inaccurate but misleading. The work I left behind was minimal, routine, and required no immediate attention. Today's tasks were A) Stem Cell media change (10 minutes), B) Differentiate stem cells into neurons per your instructions (10 minutes total), and C) Collect genomic content of clones #1-16 (approximately 20-30 minutes). Please clarify how this constitutes "a mountain of work."

In fact, I had already passed the cells on Friday to ensure no one would have to do so in my absence. The only task I was unable to complete was preparing the neuron differentiation media — which, by the way, was nearly ready. B27 and N2 were already thawed and are located on the top rack of the TC fridge on the green tube rack.

If there was any potential for additional work, I had prepared 2x 24-well plates, Matrigel-coated with SF media, inside the TC incubator, ready for quick use in case passaging was needed. Far from "dumping" work on the team, I did everything I could to reduce the burden on others. (Second shelf towards the back = 2x 24w plates treated with Matrigel and in SF media ready to be used).



If we want to talk about an actual 'dumping' of work, I've experienced this multiple times — and I mean *numerous* times. For instance, in August 2023, even prior to my discovery, the entire bead bath incubator was filled with media that was left for me to handle on my own. Normally, individuals are assigned 4-6 media bottles, but in this case, it was significantly more. To me, that's what 'dumping' work looks like. This kind of situation happened to me on a weekly basis, and you were fully aware of it back then as well.



**Proof of my workload for the past 2 years.
This was the standard amount of material I
was balancing on most days due to me
conducting the work of multiple senior
graduate students**



3. Mischaracterization of My Instructions:

Your claim that I "dumped" work on the team and provided unclear instructions is both inaccurate and unjustified. The instructions I provided were as detailed as they have always been, please excuse my quick recap of what was going on yesterday morning (Again I was in the ER). Furthermore, the tasks were routine and anyone in the lab familiar with the protocols should have been able to follow them without issue. It is not my responsibility if those covering for weekend work failed to ask questions or seek clarification. I've been left to work as a one-man team. If I had a few members working with me, this wouldn't be an issue, as they could help out over the weekend instead of the others who seem unhappy with what you're referring to as a 'dump.'

Let's not forget that I had previously requested two students to assist me. While the first student was provided initially, the second was never even mentioned. After my FMLA return, the first student I had been working with was relocated to the other group, and now you feel that work was 'dumped' on them. I'm just pointing out the sequence of events that led to this situation.

Example 1

02:25 1 Angel Emodi, Diana Ibrahim 3 members • 3 tabs Oct 25th

Harout K G 3:34 PM

Hello, will either one of you kindly feed the plates of stem cells tomorrow? They are located left hand side bottom incubator. Each well should get double media of what they normally get when you feed the stem cells. Please skip feeding the 96w plate on Saturday so it will only be 6w plates that get media swapped. 🙏

Diana on Sunday will you kindly change the media for the 96w plate by aspirating very gently (I prefer top left corner with a p200 tip) and then adding in 225μL of SF media. Leave 6w plates as is because they got double media on Saturday. 🙏

+ Message Angel Emodi, Diana Ibrahim

Home DMs Activity More

Example 2

02:25 Thread Angel Emodi, Diana Ibrahim 6 6 6

Harout K G Nov 9th at 8:16 AM

Hi all, could you please feed the stem cells for me over the next few days?

Saturday:

96-well plates: Aspirate all wells and add 80μL of media with the red marking, located in Angel's rack (3 plates total; you can use a multichannel pipette here). Two separate cell lines here.

12-well plates: For the two 12-well plates: One plate is labeled with "6w/12" circled, and the other has "2w/12". Aspirate all wells and add 1.5 mL of SF media to each well for today.

There are two additional plates in the incubator labeled "combo" or "lacZ" that do not need to be fed.

Sunday:

Passaging: The stem cells likely need to be passaged. For the plate labeled "6w/12": If confluent, freeze down two wells and passage one well.

For both cell lines, do a 1:2 clump passage into a 12-well plate.

For the plate labeled "2w/12": Passage both wells the same way: 1:2 clump passage into a 12-well plate.

96-well plates: Nothing on Sunday. 6w and 12w combo/lacZ plates: nothing on Sunday.

Monday:

Feed stem cells in 12w plates, nothing to be done for the 96w plates or the plates labelled with combo/lacZ.

Thank you all for your help as always I appreciate it! 🙏

+ Add a reply

Home DMs Activity More

4. Preparation for Weekend Passaging and Feeding:

As for the materials for weekend passaging and feeding, I did not 'fail to prepare' as you suggest. Everything was set up in advance, and any shortcomings were a result of the unexpected nature of my medical emergency, not due to negligence or lack of preparation. Your implication that I intentionally left others unprepared is both inaccurate and offensive.

In fact, I had already passaged the cells on Friday to ensure that no one would be tasked with passaging over the weekend. For your reference, there are two 24-well plates in the TC incubator (regular oxygen, middle shelf, back) coated with Matrigel in SF media. These were prepared to make the process easier for others, should they need to passage. Additionally, the media was placed in the TC fridge (top right). The only item I was unable to prepare in advance was the media for neuronal differentiation.

5. Misleading Assessment of Cell Health:

Your comments about the health of the cells are similarly misleading. While I acknowledge that some colonies may not have been perfect, your statement that they are "useless" is far from accurate. The work I've done has been entirely within the expected range of variability in cell culture. The fact that you and others have only now "noticed" issues with the cells and are using them as a basis to attack my work feels more like an excuse than constructive feedback.

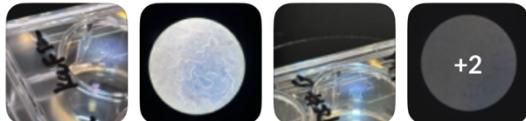
I have video evidence showing the 16 clones, and I can confidently say that most of them are in fact very healthy. I cannot agree with your attempts to undermine my work once again. Additionally, below you'll find proof of how my cells have typically looked since my return from FMLA, which further supports the quality of my work. I'm not perfect, but I know how to handle my cells and manage the work effectively. I take pride in my process, and the results speak for themselves. Furthermore, this is what the images look like typically healthy really good cells even if another individual cares for them.

Oct 6th



Diana Ibrahim 9:43 AM

Hi harout



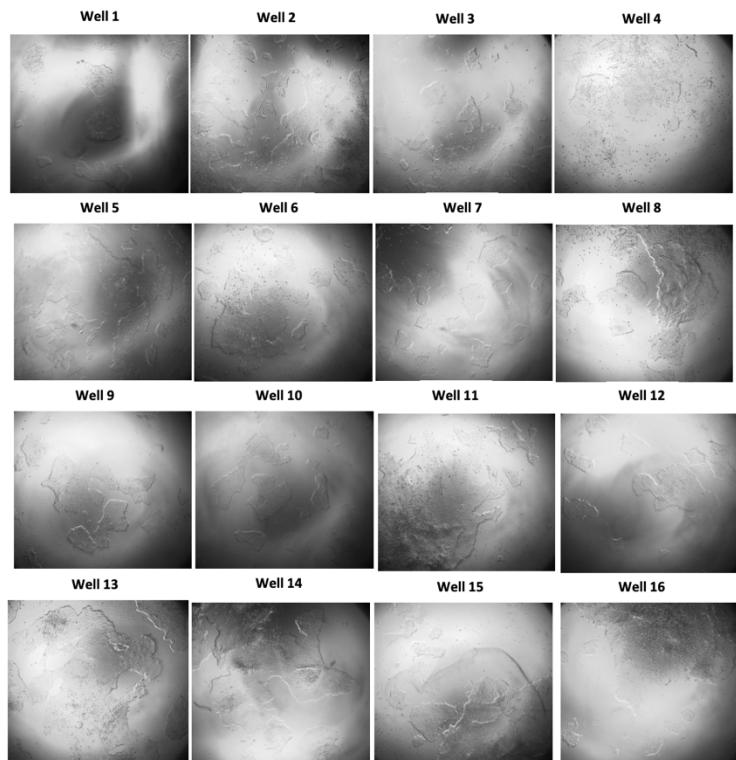
These are what ur cells look like today. I'm going to freeze them down

Or should they be fine until tomorrow? Please let me know when you can.



Diana Ibrahim 12:31 PM

I froze down everything in the top row, and just fed the second row. Please let me know how the thaw goes tomorrow! I put the cryovials in the same place as last time :)



6. Ongoing Discrimination and Professional Respect:

Moreover, I cannot ignore the ongoing and troubling pattern of discrimination surrounding my health. It is entirely unacceptable that my medical situation continues to be used as a point of contention. I am a professional, and my work speaks for itself. I should not have to defend my health at every turn as if it is an inconvenience to the lab. This behavior is completely out of line, and it needs to stop. I have not missed any work without reason, nor have I shirked my responsibilities. I will not tolerate being treated as if my health is a personal failing.

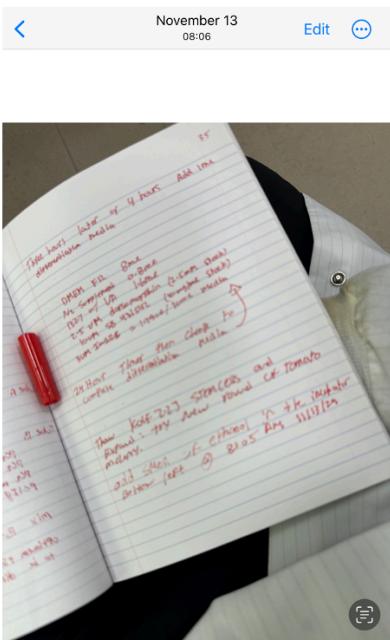
8. Directions for today:

Overview weekend November 23 and 24th 2024 Feeding/Experiments



7. Notes on Experiments

The experiment notes are being formally drafted in a traditional black-and-white notebook, following a structured format for clear documentation of materials, procedures, results, and observations. As far as moving experiments forward I had recently (twice on slack once in person) asked you to send me a list of the antibodies you would like to see with the FF organoids. While you and Erick seem to be working on them, I still await your response to this matter.



9. Moving Forward:

In conclusion, your email was riddled with inaccuracies, exaggerations, and a blatant disregard for the reality of my situation. I expect a more respectful and accurate discussion moving forward. You could have reached out to me separately to inquire about my healthcare matters and what was going on, but instead, you chose to openly discuss my personal matters with Helen. Additionally, in your Slack message from the 16th, you said, 'Also, everyone should use common sense. If you're feverish/symptomatic, irrespective of Covid test results, you should still stay home.' Clearly, this policy applies to others, but when it comes to tending to my healthcare matters, I am being treated differently. This is discrimination, retaliation, and harassment, as my situation is being handled in a way that is not consistent with how others' healthcare matters are addressed, which is materially and negatively impacting my career path, among other things. I am willing to meet on Zoom when you return to address these issues further, with Helen present and the session being recorded, but understand that I do not accept the framing of your email as a fair reflection of the facts based on the evidence provided above.

Regards,
Harout

Exhibit AB without limitations: Notification to Novitch regarding his disregard for my instructions and the constant blame placed on me if I do not cover every platform and take extra precautions to be prepared for any accusations he might direct towards me.

"This situation is frustrating, as the disruption caused by these missteps is now requiring significant time and effort to correct. It feels as though my work and the plans I set forth were not given the attention they deserved, and that instead of focusing on executing the process according to the written steps, there was more focus on modifying or second-guessing what I had already clearly outlined. As a result, we've lost valuable time, and now we're in a position where I need to address issues that should have been avoided if proper care and adherence to the plan had been taken."

"Lucky for us, I am a scientist—one who takes pride in his work. As such, I always try to cover myself and ensure that if I need to rely on others to take care of my cells, I have a backup plan in place. For instance, I had a backup of the 16 clones and I've also set aside 16 pellets for analysis. However, despite these precautions, I am still disappointed that my healthy cells were not properly taken care of. On top of all this, I find it concerning that the quality of my work was questioned, yet it's clear neither of you observed the healthy cells on the middle shelf. Furthermore, I already have the dTomato Kolf 2.2J transfected line thawed to be able to get more clones."

☆ HG Harout Gulessarian December 5, 2024 at 8:26 AM
dTomato update
To: BENNETT NOVITCH

Ben,

I've taken some time to thoroughly review the events of Saturday, and I need to address several key points of miscommunication that are impacting the progress of this work. On Saturday around 8:00 AM, I sent a detailed email, clearly outlining the steps for the day. The email included specific instructions on the use of Matrigel-coated plates and the handling of the healthy cells located on the second shelf. I even took the extra step to highlight the importance of the cells on the second shelf, as they were in an optimal condition. Unfortunately, the instructions I provided don't appear to have been followed, which has led to some significant issues.

For one, the healthy cells on the middle shelf, which were supposed to be maintained and cultured without any interference, were left untouched since Friday. These were clearly the healthiest cells (see images well 1-16), but due to the lack of media change and attention, they became unhealthy, which could have been easily avoided had the proper steps been followed. This was a critical error. Furthermore, the plate where you sent me images showing confluent cells in the center—this was never meant for passaging. I had intentionally left this plate for genomic analysis, which is why the cells became confluent in the center, they were the leftover cells from a passage. This is a situation that should have been clear from my notes, and yet it seems this step was either misunderstood or completely disregarded. If the detailed notes I sent had been followed, the confusion surrounding this plate wouldn't have happened. The cells on that plate were specifically set aside for analysis, not for further passaging.

It's not just about the physical mistakes made here but also about the underlying issue that my detailed instructions and the preparatory work I did were either not read or not respected. I was very clear in my communication, and I believe the lack of adherence to my outlined plan is a direct cause of the issues we're seeing now. The cells are in worse condition, and the workflow has been disrupted because the foundational steps weren't followed as they should have been. Had the instructions been taken into account, we wouldn't be facing these setbacks.

Additionally, the lack of documentation on what was actually done on Saturday is troubling. When I asked Diana for details on the work she carried out, her response was vague and lacked any specificity—stating only that she passaged cells from the bottom shelf and collected some for DNA extraction, but without offering any insight into the reasoning behind these actions or how they align with the instructions I outlined. This vague response only further indicates that the work was done without careful attention to the details I provided. To make matters worse, when I followed up asking about the middle shelf, Diana's reply mentioned that she was working based on a conversation she had with you, but it's clear that the instructions I sent were not followed or communicated effectively (even the quick recap sent Friday morning when I was ill). This leaves me wondering whether there was a lack of clarity in the exchange between you and Diana, or if my instructions were simply disregarded.

This situation is frustrating, as the disruption caused by these missteps is now requiring significant time and effort to correct. It feels as though my work and the plans I set forth were not given the attention they deserved, and that instead of focusing on executing the process according to the written steps, there was more focus on modifying or second-guessing what I had already clearly outlined. As a result, we've lost valuable time, and now we're in a position where I need to address issues that should have been avoided if proper care and adherence to the plan had been taken.

Lucky for us, I am a scientist—one who takes pride in his work. As such, I always try to cover myself and ensure that if I need to rely on others to take care of my cells, I have a backup plan in place. For instance, I had a backup of the 16 clones and I've also set aside 16 pellets for analysis. However, despite these precautions, I am still disappointed that my healthy cells were not properly taken care of. On top of all this, I find it concerning that the quality of my work was questioned, yet it's clear neither of you observed the healthy cells on the middle shelf. Furthermore, I already have the dTomato Kolf 2.2J transfected line thawed to be able to get more clones.

To ensure we're all aligned moving forward, I'd appreciate it if you could provide the protocol, and all the necessary steps for genomic content extraction you would like me to follow on the following google document see link below. This would help clarify any uncertainties and allow myself to proceed with a more structured approach.

<https://docs.google.com/document/d/1Pb-YJnyDQZvff0d0YkxAcWtDzIXj-M-KbRi8c0Vtlk/edit?usp=sharing>

Thank you for your attention to this matter.

Best,
Harout Gulessarian

On November 22, 2024, an individual with higher authority witnessed Supervisor Bennett Novitch, lab member Diana Ibrahim, and another lab member speaking ill of me, falsely blaming me for lab issues, and actively undermining my reputation, while seemingly plotting my termination. They criticized my work and attempted to discredit my contributions and discoveries in the Novitch lab, clearly trying to sideline me as retaliation for speaking out about unethical conduct. After witnessing these interactions, this individual reported the situation to me, corroborating my concerns. Despite this credible witness confirmation, when I raised the issue directly with Supervisor Novitch, he repeatedly failed to address the behavior, further demonstrating his bad faith in handling the situation.

Exhibit AC without limitations:

HG Harout Gulessarian December 17, 2024 at 5:55 AM
Re: dTomato update Details
To: BENNETT NOVITCH, Cc: Nguyen, Helen A., Bcc: Shelly Frohrip, Genevieve Mayer, Anashe Hakopiannik & 6 more

Hi Ben,

While I understand your preference for in-person discussions, I must point out that I have functional limitations due to mental health issues, which you and the department continue to deny me reasonable accommodation for. Simply put, I cannot meet with you in person.

Your email states, "Twice last week I asked to meet in person with you and Diana to discuss the situation, but you did not respond affirmatively." However, your Slack message from that week, which stated: "Are either or both of you available to discuss the Synapsin-dTomato cell lines that we've been trying to make? I would like to know what the status is, and if we've already collected any cells for genomic DNA preparation and genotyping, I'd like to move forward with that analysis. I'm available today until 5pm," indicates that it didn't matter if Diana or I showed up—only that one of us did. Diana had already confirmed she would attend, so it seems you were primarily looking for a response, regardless of which of us was available.

Furthermore, if you would like to meet with me, I have repeatedly let you know that I am willing to meet via Zoom, with a third-party present for support. Due to my healthcare provider's recommendations and my limitations, I cannot attend in-person meetings or large group meetings in person. I have reached out multiple times for you to offer the Zoom link, but my requests were consistently denied, as though you are acting as my healthcare provider rather than respecting the accommodations that have been recommended, then you proceed to cast blame on me for not attending.

Additionally, I would like to mention that the conversation held on Friday, November 22nd, between you, Diana, and another lab member in the tissue culture room—and the subsequent discussion between the two lab members after your exit—was passed along to me by a colleague. Instead of placing blame on me, I would suggest reflecting on the environment in which you are asking me to perform my work.

I understand that the initial email and instructions may not have been as thorough as they could have been, but I believe they were sufficient. Had the email been read carefully and the notes on the plates been followed, this communication issue might not have arisen. I must also point out that I provided the relevant details in a more condensed format on the morning of the 22nd, and you were copied on that email. If needed, you could have forwarded it to Diana instead of having a verbal conversation and then sending me a lengthy email later that evening.

Regarding the attachment you mentioned being sent on 11/30/2024, I believe there is an error. The attachment was actually sent on 11/23/2024, not 11/30/2024, as you've stated. While I understand that large attachments can sometimes be difficult to open, I didn't anticipate any issues with the document being received or accessed. If there were any problems, I would have been more than willing to resend it in a more accessible format.

While I acknowledge that my initial response may have been brief, the cell culture maintenance was clearly outlined in the email, and I believe the instructions were specific enough. You mentioned that you "...did not realize the extent of the cell culture maintenance that was required on Friday, 11/22." However, per my initial instructions (which may have seemed brief but were clear), it was noted that nothing needed to be done on Friday, 11/22, as I had already taken care of the cell culture prior to my departure.

I understand that the plate of cells you inspected was not in ideal condition, as noted in my previous email. However, the plate you continue to reference was specifically for genomic DNA extraction, and it contained some bad cells because they were plated in the center as extra material from another passage. Could you clarify why the other, better-looking cells were not mentioned in your email? All of the 96-well plates had healthy colonies prior to my departure that day as well.

Regarding your comment about subgroup meetings, I have not been able to attend due to being denied university approved reasonable healthcare accommodations by you and the department. I've made every effort to attend, and when you have sent me a Zoom link, I have been able to meaningfully participate. I would prefer to work within the accommodations I've requested, as I do not feel comfortable attending in-person due to the functional limitations I am currently experiencing.

Instead of addressing the issue, Supervisor Bennett Novitch continued to support the narrative that I was the problem, reinforcing the hostile work environment and allowing retaliation to continue unchecked. **His actions further polarized the lab and outside parties, enabling bad faith behavior to persist towards me.**

Exhibit AD without limitations:

 **Harout Gulessarian**
Current Experiments
To: BENNETT NOVITCH, Bcc: Nguyen, Helen A.

Sent - iCloud January 17, 2025 at 10:45 PM   [Details](#)

Hi Ben,

I noticed several ongoing critical issues that have impacted my ability to progress in the project you currently have me working on which I suspect might not be assigned to me after I get it to work, as is the pattern with all other projects that I have participated in thus far. I want to address these matters in hopes that they be resolved to ensure both the integrity of the project and my professional development are respected.

The first issue I would like to highlight is the persistent discrepancies in the experiment protocols and materials, which have made it virtually impossible for me to standardize the procedure. These inconsistencies seem to set me up for failure. As you are aware, during my previous attempt, one of the plasmids required for the experiment was not provided to me, which made it unreasonable to expect the experiment to proceed as planned. Now, in the current set of experiments, I am encountering further discrepancies that are once again beyond my control.

For example, the initial protocol you provided via email on 11/2/2024 called for 1uL of the 100ng/uL CIG plasmid, which you only handed to me yesterday (1/15/2025). Additionally, the DMEM-based media used in the previous experiment contained different components (i.e. Dorsomorphin) compared to the current experiment, which specifies the supplemented N2B27 media with Iw1Re and SB4 only. Around noon yesterday, you confirmed that this discrepancy was on your end, not mine. As a result, I had to switch to N2S media with the addition of + B27 without vitamin A into that media. These inconsistencies in both the protocol and the materials are exactly what is preventing me from following a consistent and reproducible procedure.

I hope these discrepancies do not negatively affect the results of the experiment, especially given the tight deadline for your grant proposal. I simply want to ensure that the data is generated and that the experiment proceeds smoothly, so I feel it is important to bring these issues to light, as they could potentially delay our results.

For your records, I washed each well with PBS approximately 20 minutes past noon on 1/16/2025 per your directions and swapped to N2S media + Iw1RE + SB4 + B27 without vitamin A.

As a reminder, I also re-shared my successful PCR results with you in the main lab yesterday, which I am happy were positive and mostly aligned with the expected outcomes that you reconfirmed. You shared your results, where you observed the correct bands, albeit with additional bands which did not present in my samples to which you tried the primer sets separately instead of a trio. Your PCR results further confirmed another 2 potential Hets. You noted that dTomato Clone 1, Clone 4, Clone 7, and Clone 14 I created were likely Hets based on your PCR attempt. It's good to see that we could come to a common agreement about the clones, specifically with ~3-4 being Hets.

Aside from the positive developments that I wish to continue presenting, I keep facing ongoing setbacks due to factors outside of my control. I am the one doing the work and generating results, yet my contributions are constantly and consistently overlooked or handed off to others without proper acknowledgement or notice. Worse, I am blamed for things that go wrong, which is both unfair and unacceptable. Regardless of what noise revolves around me, I am eager for progression and growth for the experiments that I partake in.

In fact, I know team members are speaking poorly of me because this was reported to me by a person with higher authority who heard it first-hand. I want to be clear: I am fully committed to the success of this project (provided you let me stay on this time) but I cannot tolerate a working environment where my efforts are not recognized and where I am prevented from presenting my results, or receiving due credit and work privileges that I rightfully deserve – especially when I see others benefitting from these same privileges.

To illustrate how this feels, I will reiterate what I told you in the main lab that I would liken it to being a baseball player who has hit a home run, running around the bases, and just as I'm about to cross the final base to score my points, my legs are broken, preventing me from completing the task and getting the recognition I've earned. I've put in the hard work and achieved success, but I'm being stopped from finishing the process due to factors beyond my control which I have repeatedly asked to cease.

Interestingly, I recently read a piece on Moana 2 and its "earworm" of a song "*How Far I'll Go*." Though not my typical source of inspiration I find that regardless of "lofty titles" we are encouraged to strive to go beyond any "ceilings that may impede us". All I ask is for a fair and equal opportunity in the lab instead of roadblocks that are placed to dampen my scientific standing on paper.

Ideologies aside, will you kindly provide a written standardized protocol for the next steps of the experiment so I can move forward with this assignment given I am provided the opportunity to continue working on what I have accomplished.

Lastly, Weekend and Holiday Feeding on Monday 1/20/2024:

I will return to the lab on Tuesday after the holiday. In preparation, I have made three pre-made 6-well Matrigel plates and left the media (SF media and N2S media + supplements) out for the weekend. The Google document has been updated with the current batches and ongoing experiments and what was needed to be done for Saturday. I uploaded this around 3:00pm today see images below and find all information here on the shared google document.

Thanks for your time.

Kind regards,

Harout Gulessarian

In recent communications with Supervisor Bennett Novitch, I directly called out the misleading and intentionally incomplete steps in the experiments. Instead of addressing these issues or making necessary corrections, he continued to manipulate the situation to discredit me. On January 17th, 2025 I sent an email detailing these concerns, yet on January 23, 2025, **I was again provided with the incorrect formula for media preparation**. As a result, cells that had been healthy the day before now appeared unhealthy, **factors entirely beyond my control**, given that the media preparation list was provided by Supervisor Bennett Novitch himself. This intentional bad faith pattern of setting me up for failure continues and cannot be swept under the rug.

I am confident that these retaliatory actions are not a reflection of my abilities or job performance, **nor are they part of any legitimate coaching**. Instead, they appear to be a deliberate bad faith attempts to create a false narrative aimed at **unlawfully terminating me**, discrediting my work, and forcing me out of the lab. Despite my efforts to document these issues, the environment remains toxic, hostile, and retaliatory.

Additionally, I have been consistently denied the opportunity to present my work during lab meetings, despite being scheduled to do so. Supervisor Novitch has prevented me from showcasing my findings, restricting my ability to demonstrate my contributions to the team and effectively sidelining me on 12/19/2024. This denial, one part of a bigger issue with healthcare accommodations being denied, has had a direct impact on my career advancement and professional recognition. While others continue to work on my discovery, I have been continuously blocked from making progress since my return from FMLA.

Exhibit AE without limitations:

The image contains two screenshots of a mobile device interface. The left screenshot shows a '2024-2025 LAB MEETING SCHEDULE' table with columns for Date, Presenter, and Time. Several entries are highlighted in yellow, indicating specific dates of interest. The right screenshot shows an email exchange and a messaging interface. The email from Harout Gulesserian to BENNETT NOVITCH on 12/19/24 asks for a zoom link to present work. The messaging interface shows a message to '#general' asking for a zoom link, and navigation icons for Home, DMs, Activity, and More.

Date	Presenter	Time
9/26/24	Lab organization/ expectation meeting	10:00-11:30 AM
10/3/24	No lab meeting	
10/10/24	Keith	10:00-11:30 AM
10/17/24	Sangmok	11:30 AM -1:00 PM
10/24/24	Salena	10:00-11:30 AM
10/31/24	Cendi	10:00-11:30 AM
Tue 11/5/2024	Sozic	1:00-2:30pm
Tue 11/12/2024	Yesica	1:00-2:30pm
11/1/24	Jessie	11:30 AM -1:00 PM
11/8/24	Thanksgiving	
12/5/24	Mydia	10:00-11:30 AM
12/12/24	No lab meeting	
12/19/24	Harout	10:00-11:30 AM
1/9/25	No lab meeting	
1/16/25	No lab meeting	
1/23/25	Natella	10:00-11:30 AM
1/30/25	Sandeep	10:00-11:30 AM
2/6/25	No lab meeting	
2/13/25	Diana	10:00-11:30 AM
2/20/25	Cristian	11:30 AM -1:00 PM
2/27/25	Angel	10:00-11:30 AM
3/3/25	Marie	10:00-11:30 AM
Tue 3/11/2025	Keith	1:00-2:30pm
3/20/25	Sangmok	11:30 AM -1:00 PM
3/27/25	Spring Break	
4/3/25	Salena	10:00-11:30 AM
4/10/25	Cendi	10:00-11:30 AM
4/17/25	Sozic	11:30 AM -1:00 PM
4/24/25	Yesica	10:00-11:30 AM
5/1/25	Talin	10:00-11:30 AM
5/8/25	Isaiyah	10:00-11:30 AM
5/15/25	Yahir	11:30 AM -1:00 PM
5/22/25	Maria/Erick/Antonella	10:00-11:30 AM
5/29/25	Harout	10:00-11:30 AM
6/5/25	No lab meeting	
6/12/25	Natella	10:00-11:30 AM
Tue 6/17/2025	Sandeep	1:00-2:30pm
6/26/25	Angel	10:00-11:30 AM

Moreover, Supervisor Bennett Novitch has made unfounded allegations regarding my work schedule, accusing me of leaving early on multiple occasions. These claims are baseless and appear to be another attempt to mislead HR, departmental leadership, or other university officials in bad faith. **I have consistently adhered to my work schedule and duties**, yet I am forced to take a picture of myself every few hours to prove to Supervisor Bennett Novitch that I am in the lab, as I am subject to constant micromanagement by Supervisor Bennett Novitch and other lab members.

Exhibit AF without limitations:

BN BENNETT NOVITCH October 24, 2024 at 3:24 PM
Re: Lab meeting
To: Harout Gulessarian

Hi Harout,

When I excused you from the lab meeting, it wasn't intended to be a pass on your work commitments today altogether. You will need to report your absence today as personal time off/sick leave.

Can you please tell me what happened to the plate of cells with the Syn-dTomato reporter that you had shown me on Tuesday? I could not find it in the incubator today. While I was unable to start an experiment with these cells yesterday, I had nevertheless planned to use them today- but they seem to have disappeared. Do you have any explanation of where they might have gone? Did you discard them or instruct others to do so?

I'm also not seeing any notes in the google doc that you created for some time (since ~10/11), and so feel in the dark as to where our experiments are, what you have been doing, and what you are planning on doing. I would like to regroup and discuss your work plan and try to establish some better means of communication as the present methods are not working for me. Your unwillingness to use Slack does not help the situation.

Ben

HG Harout Gulessarian October 24, 2024 at 11:22 PM
Re: Lab meeting
To: BENNETT NOVITCH

Hi Ben,

I am writing to formally respond to your recent email regarding my work commitments and the status of specific cell lines, as well as your comments about conflicting communication methods. I would like to address the points raised, ensuring clarity, and accuracy regarding my activities and responsibilities. I must object, reserve all rights, make no waivers, and no admissions, especially given the below evidence supporting and suggesting an alternative viewpoint.

1. Attendance and Work Activities
First and foremost, I want to clarify that I was present in the lab for the entirety of the day in question. I began my work in the tissue culture area, later I was responsible for storing the N2 vials upon their arrival. I signed off on the delivery at 11:10 AM and stored the vials away in the Butler -80. I went to lunch from 12:00PM-12:30pm. I sectioned 4 different blocks from 12:30-3:30pm. Additionally, you ran me around 3:30 PM in the TC at the end of my work shift, where I was actively engaged in finding and pointing out the plate in question. Therefore, the suggestion that I was absent and need to report personal time off/sick leave is unfounded and incorrect.

2. Status of the Syn-dTomato Cells
Regarding the KOLF 2.2J line with the Syn-dTomato reporter, I must emphasize that our previous conversation on Friday prior to leaving due to unfortunate situation that had occurred with Sandeep, confirmed that I had left you a plate of these stem cells at 50% confluence, following our discussion about the cells and their intended differentiation using Retinoic Acid for neuronal differentiation. I returned on Monday to find the plate at 90% confluent and had to passage them as you were aware. During our subsequent conversation on Tuesday, I again informed you about the availability of these plates. I was surprised to hear about your concerns regarding their whereabouts today; I confirmed that the plate is in the incubator, where it should be, and I did not discard it nor instruct anyone else to do so.

In furtherance, I had asked you kindly to remake the Syn-dTomato plasmids for the transfection, as the current plasmids were not as effective as the GFP. We had agreed that I will try using the vial you made for one more round, and then if that doesn't work then start over.

3. Communication and Documentation
You mentioned a lack of updates, however, we had a thorough discussion on Tuesday for over an hour in the hallway of the main lab, during which I detailed my ongoing projects, including a completed RNA-seq analysis from my Feeder-Free organoids and the discovery of SBS, along with several successful reporter line insertions and expansions (GFP-RETT, mCherry-RETT-Mutant, and GFP-KOLF2.2J). I also informed you about the progress on the sectioned slides you and Erick are working on. I have consistently engaged in my work duties, including sectioning four blocks today after my tissue culture work, despite your incorrect suggestion that I took off the entire day. Thus, the implication that I am not adequately communicating my work is inaccurate.

4. Slack Communication
Regarding the use of Slack, I must clarify that I was involuntarily removed from the lab's Slack channel during my FMLA, which hindered my ability to communicate through that specific channel, not the UCLA Slack platform as a whole. However, my personal UCLA Slack account remained functional throughout my FMLA, and I have utilized it to communicate with other colleagues from the Novitch and Butler lab respectively since my return to work from FMLA. This includes without limitations interactions on August 22 with Cristian from the Butler lab, September 28 with Diana and Angel, October 4 with Salena from the Butler lab, and October 6 again with Diana.

You mentioned that my due to a request from the department, but since I have returned, I await an invitation to rejoin your lab's Slack channel, as you likely hold administrative access. If there has been a communication breakdown, please reach out directly through UCLA in the future, as I am available and responsive on both platforms. While I do not have notifications on loud, I check the platforms every hour for updates or requests from others as I had mentioned this to you in person on Tuesday.

BN

BENNETT NOVITCH

Re: Harout: Days Off Request

To: Harout Gulessarian, Cc: Helen A. Nguyen

December 16, 2024 at 6:57 PM

[Details](#)

Hi Harout,

I didn't see you at work today, and others mentioned they hadn't seen you either. Is there a reason for your absence?

I am also very concerned that if you had started cell cultures last week and expected that someone else would be looking after them, this message was not effectively communicated as you appear to have never had any conversation with others indicating that there was work to be done. Simply putting content into a Slack message or even a Google doc without an accompanying personal prompt or conversation does not suffice.

As I've repeatedly said, personal communication is key, and we need to talk with one another regularly as our projects are team-based and complex. Anyone being asked to do something for you should be allowed to review what is being asked of them and ask clarifying questions in real-time. You also have to remember that Diana and others you ask to help you with this work are doing it in part as a favor to you. They do not work for you, and they have their own experiments that they are attending to, so you need to minimize the asks.

Based on this concern and what I am seeing as potentially more negative experimental outcomes stemming from this continued breakdown in communications, I am asking you not to start your vacation until we can meet in person to discuss the status of the experiments, as this is vital for my understanding of what needs to be done and how we can create a crystal clear plan for how experiments could be managed during the holiday period and start of the new year.

Please provide me with a time and day when we can meet in my office this week.

Best,

Ben

Bennett Novitch, Ph.D.
Professor, Department of Neurobiology
Broad Center of Regenerative Medicine & Stem Cell Research
David Geffen School of Medicine at UCLA
650 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

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Email: bnovitch@ucla.edu
Web: <http://novitchlab.com>

[See More from BENNETT NOVITCH](#)

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, December 17, 2024 5:58 AM
To: BENNETT NOVITCH <bnovitch@ucla.edu>
Cc: Nguyen, Helen A. <helenanguyen@mednet.ucla.edu>
Subject: Re: Harout: Days Off Request

Hi Ben,

I am responding to both of your emails here in this instant email.

Email #1 Ben to Harout

Ben's Email: "It's routine for staff to first reach out to their supervisors with vacation requests. Regarding the timesheet, I think only you can fill that part in. These dates all look fine, though we need to consider what cell lines you have growing (if any) and if there are some to be maintained. I would like to meet to discuss plans for who will be looking after them so that we have no confusion, and if we can prepare materials for anything that needs to be done, that would be helpful for whomever is covering work for you."

"I also would like to meet to discuss the clones of cells that you have generated/genotyped recently so that we can start to make plans for further analysis and potential use in experiments over the next few weeks-months. I am free today between 12-4pm, and tomorrow 2-5pm. If necessary, I have more times free on Wednesday."

"Lastly, you are scheduled to present lab meeting this week. If you'd like to go over any part of your presentation with me in advance, please let me know."

My response:

1st Paragraph: Vacation Request, Timesheet, and Cell Lines

Hi Ben,

I have already submitted my vacation request for the 20th, in compliance with standard procedure. The dates are confirmed, and I will ensure that my timesheet is completed accurately. Regarding the cell lines, I have taken all necessary steps to store critical vials appropriately for the new year. My PCR gels have been showing positive results, and I am unclear on your comment regarding missing bands. As far as I'm concerned, the results are valid, and I am unsure what issue you're referring to. Upon my return after the holidays, I will thaw and continue with the cell lines. No one will need to cover my work in my absence. I do not anticipate any confusion, and any further clarification should be provided in writing if there are specific concerns.

2nd Paragraph: Clones of Cells for Further Analysis

Regarding the clones I've generated and genotyped, I will provide the necessary updates and discuss the next steps for analysis and potential use in experiments. However, I must reiterate that I will not engage in any in-person meetings. As previously stated, I prefer to meet remotely via Zoom as we have done this previously with no issues, and I am available this week to meet.

3rd Paragraph: Lab Meeting Presentation

I am aware of my scheduled presentation at this week's lab meeting. I am working on my PowerPoint and currently I do not foresee any revisions at this time.

Email #2 Ben to Harout

"Hi Harout,

I didn't see you at work today, and others mentioned they hadn't seen you either. Is there a reason for your absence?

I am also very concerned that if you had started cell cultures last week and expected that someone else would be looking after them, this message was not effectively communicated as you appear to have never had any conversation with others indicating that there was work to be done. Simply putting content into a Slack message or even a Google doc without an accompanying personal prompt or conversation does not suffice.

As I've repeatedly said, personal communication is key, and we need to talk with one another regularly as our projects are team-based and complex. Anyone being asked to do something for you should be allowed to review what is being asked of them and ask clarifying questions in real-time. You also have to remember that Diana and others you ask to help you with this work are doing it in part as a favor to you. They do not work for you, and they have their own experiments that they are attending to, so you need to minimize the asks.

Based on this concern and what I am seeing as potentially more negative experimental outcomes stemming from this continued breakdown in communications, I am asking you not to start your vacation until we can meet in person to discuss the status of the experiments, as this is vital for my understanding of what needs to be done and how we can create a crystal clear plan for how experiments could be managed during the holiday period and start of the new year.

Please provide me with a time and day when we can meet in my office this week.

Best,

Ben"

My response:

1st Paragraph: Absence Response

I was in the lab today and worked throughout the day, as I regularly do. I interacted with multiple colleagues, including Sangmok Kim, Soizic Riche, Sandeep Gupta, Yahir, Talin, Isaiah, Cendi Ling, Sergio, and Dr. Martin. Specifically, I had a brief discussion with Sangmok Kim regarding the fresh TBE buffer he prepared, and I also completed several tasks in the lab: extracting DNA in the TC, measuring the concentration of clones #9-16 in the qPCR room, running a PCR reaction and gel, and preparing my PowerPoint presentation for the upcoming Lab Meeting. I documented my work with images throughout the day as evidence of my time in the lab.

If there has been any misunderstanding regarding my presence or activities, I am happy to clarify. However, I was present and fully engaged in work, as demonstrated by the evidence below as I was in lab as early as 6:53am and left exactly at 3:30pm. Most certainly if I was not in lab today how is it possible that I ran a PCR reaction and gel with today's date?

This is the second time you have attempted to impose the idea that I am not working, and I fail to understand what purpose this serves. I find this repeated mischaracterization of me to be harassment, and I am tired of being treated in this manner. Instead of taking additional steps to reach out to me directly or seek clarification, it seems easier for you to assume I am not at work. I am exhausted from having to constantly justify myself when I am following the rules of the work environment to the tee.



2nd Paragraph: Communication on Cell Cultures Response

I want to make it clear that I have not expected anyone to take over responsibilities that are outside their scope. I am contracted to work Monday through Friday, and I have not requested anyone to perform tasks that are not part of their duties. As a reminder, my work obligations were documented in an email on 8/16/2024 by our department's HR representative, Helen Nguyen, who stated that my work schedule "will not require any after-hours or weekend work".

As you requested, I set up an online notebook to streamline communication, ensuring that you and Diana could review the progress of the work over the weekend. I made sure to tag Diana specifically to communicate what needed to be done. Additionally, I documented all media changes and passaging both on the plates and in the online notebook. I used Slack and other tools to keep everyone informed. These tasks were straightforward, yet despite the clear communication on the platforms you specifically requested, they were seemingly overlooked.

Moreover, I proactively made the Matrigel-coated plates and thawed the media to expedite the process. I find it concerning that, despite my clear communication and preparation, these actions were not acknowledged. I remain open to discussing any concerns, but I have made every effort to ensure all tasks were communicated effectively.

3rd Paragraph: Communication and Workloads Response

Supervisor Bennett Novitch's repeated accusations seem designed to document false claims against me, setting the groundwork for potential disciplinary action. This has become part of a broader pattern of retaliation, where my efforts to meet expectations are intentionally misrepresented. **No employee should be forced to take images of themselves throughout the day in fear of being falsely accused of not performing their job.** Additionally, the intentional sabotage of materials and the provision of incorrect instructions for experiments are clear acts of bad faith and not of coaching or counseling, as they deliberately exacerbate the negative impact on my employment and hinder my ability to perform my duties.

In conclusion: Supervisor Bennett Novitch's actions, based on the evidence presented, constitute indirect work discipline, demotions, and indirect workplace evaluations. These management actions are arguably in bad faith, violating my workplace UCLA employment agreement and are arguably retaliatory and discriminatory in nature, particularly in response to my exercising my legal rights as a whistleblower, taking FMLA, and requesting reasonable healthcare accommodations, among other protected class actions.

Please Investigate

Thank you, Vice Chancellor Krause, for your valuable time and assistance; they are deeply appreciated. An institutional response is urgently needed to address the ongoing corruption within the Neurobiology Department at UCLA

Change in Legal Team

Will you kindly send all future correspondence to my email at Hkg90@icloud.com, as I am in the process of transitioning my legal team and will update your office accordingly.

Sworn Declaration

I, Harout Gulessarian, hereby state under oath that all terms and provisions set forth in any and all Attachments to this instant Complaint, including but not limited to those materials previously delivered to UCLA via email or USPS certified mail, are hereby incorporated herein by reference with the same force and effect as though fully set forth in this instant Complaint. Furthermore, I, Harout Gulessarian, make no waivers, no admissions, and reserve all rights, without limitations, to amend, revoke, modify, or supplement any and all provisions of the instant Complaint, particularly as additional evidence is discovered in connection with these matters.

***Sworn:** The Complaint concludes with the following sworn declaration: "I swear under penalty of perjury under the laws of the State of California that the facts set forth in my Whistleblower Retaliation Complaint and in any supporting documents I have submitted are true and correct to the best of my knowledge and belief.*



Signature: Date: January 27th, 2024

Harout Karnik Gulessarian

Hkg90@icloud.com

Case Number: EP23681