

*This complaint is based on including but not limited to: whistleblower, Whistleblower retaliation, discrimination on the basis of race, ancestry, national origin, disability, medical or healthcare-related conditions, and the exercise of rights under federal and state law among many other things. Complainant makes no admissions and expressly reserves all rights. This document does not constitute a waiver of any claims, causes of action, or legal theories. Complainant reserves the right to amend, supplement, modify, clarify, or withdraw any part of this filing as more evidence or circumstances arise.*

*I, Harout Gulesserian, 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 Gulesserian, 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.*

**From:**

Harout Gulesserian  
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**To:**

Locally Designated Official & Vice Chancellor Mark Krause  
Chief Compliance & Audit Officer and Locally Designated Official  
10920 Wilshire Blvd., Suite 700  
Los Angeles, CA 90095-1366

Whistleblower Retaliation Complaint  
Filed on: May 5, 2025

**Submitted by:** Harout Gulesserian **Position:** Staff Researcher, UCLA **Date:** May 05, 2025

Dear Vice Chancellor Krause,

The following is alleged and submitted to your office for further review.

First and foremost, I want to express my sincere gratitude for the time, effort, and support you and your entire office have provided. I am truly thankful for the dedication and hard work you, and your team continue to demonstrate—thank you.

Secondly, I continuously remain punished as sadly my paycheck for essentially these last 2 pay periods for hours actually worked has been precluded from being paid in full by intentional design (see Exhibit 1) with intentional delays; from the first paycheck basically, more or less, after taxes I am missing approximately 1200.00 US Dollars 64 hours missing (See exhibit 2). Moreover, from this 2<sup>nd</sup> instant pay period I am effectively going to be denied another approximately \$1,500.00 US Dollars after taxes; 80 hours worked but not paid (see Exhibit 3), in addition to all the other downstream matters that get harmed from one-to-one wage and hour violations, without limitations among many other things. Now I am being treated differently and was recently told that basically I now need to fill out or somehow receive “a paper (Excel template) time sheet[;]” which I am yet to receive any training on or actually understand how this new “paper” ( See Exhibit 4) is not yet a new hurdle at getting my missing pay, as I essentially was locked out from two consecutive HBS applicable pay periods respectively. (See Exhibit 5)

Moreover, this writing also serves as formal Whistleblower retaliation complaint to you and your office in your official capacity, as well as a formal complaint in any other capacity available; ultimately, this writing also serves as personal plea for your help because the economic hardship of this proportion is really having (evidence indicates likely as maliciously planned) an impact and causing many foreseeable concentrically spreading consequential damages and harms that I fear will be capable of repetition and will likely evade any meaningful review if a thorough investigation is not taken up, among other things without limitations.

Given the timing of these wage and hour violations, and the being locked out of the system—again, then coupled with the University just denying “any IP rights” appears as evidence establishing a long term strategic intentional foreclosing of what otherwise would be a valuable recognition of the academic personnel process and my career under the innovation transfer and entrepreneurship roles per University of California objectives and Policies as underscored by Provost and Executive Vice President for Academic Affairs, Michael T. Brown, Ph.D. (See exhibit 6)

Consequently, under UCLA procedure 955.1 (See exhibit 7) my request as to my accidental invention matters received a negative response (See exhibit 8). Seemingly this. could have helped economically as well as my career pathway (see exhibit 6 and 9), as I am certain you can understand given the evidence presented establishes a picture of long term deep seeded intent,

knowledge, motive, and other patterns (now well established per the documentary evidence) designed and schemed to intentionally cause a chip away economic hardship and engineered career pathway demolition vis a vis harassment, retaliation and discrimination motives, among many other harms sometimes all too numerous and overwhelming to list in real time because the hostile work environment has never stopped as the evidence establishes. Again, I very respectfully ask for an expansion of the investigation (or technically a new investigation if need be but in an effort to further economy and efficiency it may make most sense to simply expand the existing investigation); also, I very respectfully ask for your help, and **very respectfully** remain **extremely grateful** to all your time and assistance on all matters raised.

This instant formal request for investigation is made, then as listed above, and along with the following it is alleged and submitted as follows: I, (hereinafter “Harout Gulesserian” or “Gulesserian”), am filing a formal whistleblower retaliation complaint dated May 5, 2025, with a request for investigation and written report thereafter.

This instant complaint alleges and submits retaliation for whistleblowing, among other things for... “*Making a Protected Disclosure of an Improper Governmental Activity*, defined as a good faith communication... that discloses... information that may evidence activity undertaken by the University or by a university employee that is:

- in violation of any state or federal law or regulation;
  - economically wasteful; or
  - involves gross misconduct, gross incompetence, or gross inefficiency.
- *Making a Protected Disclosure of a health/safety threat*, defined as a good faith communication... that discloses... a condition that may significantly threaten the health or safety of employees or the public...
  - *Refusing to obey an Illegal Order*, defined as a refusing to obey a directive to violate or assist in violating a federal, state, or local law, rule, or regulation; or refusing to obey an order to work or cause others to work in conditions outside of their line of duty that would unreasonably threaten the health or safety of employees or the public.”

As the UCLA Office of Compliance may already be well aware of, Gulesserian has made numerous protected disclosures in accordance with applicable whistleblower protection laws and policies without limitations, many of which have become the focus of an ongoing (UCLA Office of Compliance) investigation based on objective demonstrable evidence without limitations (See Protected Evidence Disclosure Handbook).

These new instant protected disclosures are made without limitation and are supported by the new evidence in conformity with the attached Protected Evidence Disclosure Handbook (hereinafter more commonly referred to as “PDEH”; See attached PDEH), which is hereby incorporated by reference as if fully set forth herein and serves as an outstanding evidence resource for establishing continuous and ongoing retaliatory, and discriminatory patterns of

behavior, animi as to ongoing motives, and of course underlying and ongoing intent, knowledge, and identity among other matters without limitations (See all exhibits attached without limitations). The new evidence will tend to demonstrate that more than one respondent exists; the additional and new evidence when coupled with PDEH establishes identity for other potential Respondents, regarding administrative misconduct, among other things, in addition to Bennett Novitch, without limitations.

For ease of reference, illustration and viewing purposes, listed below are relevant snippets of several of the major protected disclosures Gulesserian made to date without limitations. In addition, Gulesserian has recently submitted various new protected disclosures to Shelly Frohrip, based on evidence that became available as of 04/23/2025 (See Exhibit 10; Attached Shelly Frohrip email exhibit incorporated by reference as if more fully drafted herein).

The new information serves as corroborating evidence of the ongoing and coordinated retaliation by multiple individuals, further substantiating the claims raised in this instant complaint and corroborates continuous ongoing matters vis a vis transcending intent, motive, knowledge, and identity of bad acting respondents, among other matters without limitation identified in the PDEH evidence book, and this instant complaint without limitation.

**Without limitations, below is a list of various protected disclosures without limitations made by Gulesserian alleging the following without limitations:**

- 1) “ On January 30, 2024, you reported to your supervisor, Dr. Bennett Novitch, by e- mail, that not reporting your discovery of special molecule SB590885 and associated protocol to UCLA’s Technology Development Group (TDG) was a violation of the UCLA Patent Policy.
  - In late January 2024 you reported “hostile environment” to UCLA’s Confidential Counseling and to UCLA’s Office of the Ombudsman, twice.
  - On February 23, 2024, you informed Dr. Novitch, in person, that your discovery of special molecule SB590885 and associate protocol was intellectual property (IP) that was required to be reported to TDG.
  - On February 27, 2024, you reported to TDG (Charanji Arora) that Dr. Novitch planned to disclose the protocol to other laboratories and a consortium group, which would fail to protect the IP.” (Vice chancellor Krause)
- 2) “That the Respondent was responsible for subjecting you to the following Adverse Personnel Action:
  - You consistently worked between 50 and 60 hours per week, but Dr. Novitch instructed you to report only 40 hours per week on your time sheet, and you were only paid 40 hours per week despite assurances that you would be properly compensated for your time.” (Vice chancellor Krause)

- 3) Moreover, without limitation on or about April 1, 2025, and April 23, 2025, and April 29<sup>th</sup> and May 2<sup>nd</sup> Gulesserian made new protected disclosure(s) to Shelly Frohrip concerning violations of UCLA policies, rules, and procedures, as well as potential violations of state and federal laws, among other issues by UCLA Neurobiology administrator(s) (See exhibit 10 and Exhibit 11). This protected disclosure was made without limitation, in accordance with Gulesserian's rights under applicable whistleblower protection statutes, university policy, and in good faith without limitations (See exhibit 2). More specifically, and again without limitation, please see the attached email from Gulesserian to Shelly Frohrip dated 04/01/2025, and 04/23/2025 which is incorporated by reference as if fully set forth herein (See exhibit(s) 10 & 11).

The respective 04/01/2025 04/23/2025, and the 05/02/2025 dated email(s) to Shelly Frohrip, this instant correspondence, along with the PDEH evidence book (See PDEH), taken together document numerous protected disclosures and establish the foundation of ongoing *knowledge, intent, motive, behavior, and identity*, that there was and is past, current, and ongoing departmental retaliation that will likely continue to be directed toward Gulesserian among other things without limitation. Further, the evidence identifies the alleged discriminatory, harassing, and retaliatory conduct by "...A management action that affects the Complainant's existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination ..." (Vice Chancellor Krause) all the while the conduct by bad acting respondent(s) is inconsistent with the terms and conditions of Gulesserian's Employment Agreement with employer UCLA, violative of State of California, and Federal law, including but not limited to the timed denial of inventor creator rights per employment policy, benefits and contract(s) signed by Gulesserian accepted by employer UCLA, without limitations (See exhibit 12).

The following examples without limitations warrant an investigation as they objectively demonstrate probable cause and ongoing retaliatory conduct toward whistleblower Gulesserian while establishing identities coupled with continuing acts as to why additional persons(s) should be investigated and ultimately considered as respondent(s) (including but not limited to Administrators, Supervisors, Principal Investigators, Graduate Students, among others co-conspiring with behavior patterns, knowledge, motive and intent laced into bad acting actor(s) on the instant matters.

Specifically, all of the evidence taken as a whole supports an investigation that these individuals all acted in bad faith, in a coordinated fraudulent scheme or attempted, all had actual knowledge of the protected disclosures made by Gulesserian, all demonstrated retaliatory intent, engaged in improper actions & conduct, and exhibited a sustained pattern and practice of misconduct without limitations that's only getting worse as Gulesserian now remains locked out of the payroll system and will likely be docked a total of \$2,700.00 US dollars from paychecks that actual money is not paid for actual hours worked (See Exhibits 2 and 3).

- A) *One of the most recent example(s) of retaliatory conduct occurred on or about 2/28/2025 which involved Chief administrative Officer Lucas, misconduct, including the fraudulent manipulation of Gulesserian's wage and hour timesheets (See exhibit 13) in attempts to add more hours than Gulesserian had worked which constitutes as economically wasteful, involves gross misconduct, gross incompetence, or gross inefficiency (See more fully disclosed below section titled "I) retaliatory non-payment for hours worked, II) intentional administrative misconduct").*
- B) *The failure to pay Gulesserian accurately for the hours Gulesserian worked. Specifically, Gulesserian was compensated for only 16 hours of work, despite having actually worked 80 hours (See exhibit 2) during that pay period (See more fully disclosed below section titled "I) retaliatory non-payment for hours worked, II) intentional administrative misconduct").*
- C) *Gulesserian was then again locked out the timesheet system for the pay period 4/14-4/25/2025 (See Exhibit 3), once again 80 hours short for actual work conducted during this period which now totals to 144 hours not paid from the last two paychecks (See more fully disclosed below section titled "I) retaliatory non-payment for hours worked, II) intentional administrative misconduct").*
- and ...*
- D) *The failure to acknowledge Gulesserian as an inventor per Gulesserian's employment terms, conditions and/or state of oath patent agreement signed employment contracts by exposing the trade secret to the public and being denied as a form of retaliation (See exhibit 8 & exhibit 13) (See more fully disclosed below section titled III) the denial of inventorship credit along with associated employment benefits per the patent policy (See exhibit 14) as a form of retaliation).*

Thus, the current intentional and motivated negative conduct of the non-Novitch lab identified individuals coupled with the continuing and previously described adverse employment actions by the Novitch Lab and Department based individuals towards Gulesserian – shows timing where causal links of denial of Intellectual Property and denial of paycheck wages earned shows the same bad actors were aware of the whistleblower complaints as they continue to impose retaliatory material and negative impact upon Gulesserian's employment terms at UCLA; such that in a material and negative manner with the hostile work environment remaining continuous with no breaks or effective remedial measures whatsoever for nearly 2 years (See exhibit 10 and exhibit 11), despite Gulesserian's incessant request for help and assistance (see all attached evidence including but not limited to PDEH) to establish pattern of behavior, proceeded by a bad faith act by numerous respondents who are also part of management that caused ... “..A

management action that affects the Complainant's existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination ..." (Vice Chancellor Krause) in ways that are systemic, ongoing, and grounded in institutional bias and retaliation, including—but not limited to—academic, professional, and personal domains— which are not coinciding with Gulesserian's employment terms with employer UCLA.

Critically, and an example of egregious conduct and behavior, some of the same administrative individual(s) (which should very likely be added as potential additional Respondent's (i.e Neurobiology HR representative Helen Nguyen, and/or Chief Administrative Officer Mark Lucas without limitations) who, as previously reported and demonstrated with objective evidence in the past had pulled the same or similar shenanigans punishing Gulesserian by, among other things, locking Gulesserian out of the UCLA LOAN system during Gulesserian's FMLA intentionally as a form of punishment & retaliation for whistleblowing among other things (This protected disclosure was initially made to UCLA Discrimination Prevention Office on May 23, 2024 but no action was taken as DPO did not see the knowledge, intent pattern, or motive of these individuals just yet (See Exhibit 15 )) —and thereby interfered with Gulesserian's ability to be paid timely (6-8 week payment delays) as a form of retaliation among other things (please see PDEH)— are now the same individual(s) who are actively blocking Gulesserian's access to the timesheet system (See exhibit 2 & 3), and/or fraudulently modifying Gulesserian's recorded worked hours (See exhibit 16), thus conducting administrative misconduct among many other things all in bad faith acts of retaliation among other things.

These actions falsely suggest that Gulesserian was reporting inflated hours when, in fact, it is those same bad-faith actors who are and were manipulating the records and systems of UCLA (See exhibit 17) that are now again acting in bad faith and continuing their retaliatory acts among others for Gulesserian's whistleblowing among other matters raised with employer UCLA without limitations.(See Evidence PDEH)) These egregious and violative acts were previously mentioned and reported to supervisory or other requisite persons in charge at UCLA, and no action was taken but the pattern of conduct persists and now presents itself as a form of ongoing retaliatory conduct that continuously rears its ugly head with individuals who have knowledge, intent, motive, and a pattern of bad behavior.

Just to keep you and your respective department in the loop, and very respectfully Locally Designated Official & Vice Chancellor Krause, it is noted that Gulesserian was laterally transferred out of the Novitch lab on 2/13/2025 after Novitch had threatened Gulesserian physically to "bring it on" on or about 2/10/2025 in the human Tissue Culture room (See Exhibit 18) while clenching his fists as an act of physical intent when Gulesserian refused to waive his rights to the discovery. Thus, the patterns of behavior manifesting causal links between the intentional lockouts that were in lock step with physical intent of clenched fists are still occurring even though Gulesserian is no longer in the Novitch lab, and therefore the attached "Protected

Disclosure Evidence Handbook” is a wonderful resource for corroborating the identity of additional Respondents that arguably should be added to the investigation; so as it becomes evident that there arguably is more than one respondent in this situation because the harm is ongoing, and it remains axiomatic that it cannot be just Bennett Novitch causing the intentional motivated harms to Gulesserian. In addition to Helen Nguyen and Mark Lucas, the evidence further supports the inclusion of additional respondent(s), as new findings substantiate the original complaints regarding the Consortium’s fraudulent involvement in Gulesserian’s scientific discovery (See Exhibit 19). Specifically, the evidence shows that Aparna Bhaduri—who is affiliated with the Consortium’s organoid team—had her protocol submitted for patent protection with UCLA’s Technology Development Group (TDG) (See exhibit 20), while Gulesserian continues to be denied the same employment benefit under contract and inventorship recognition (See exhibit 21). Notably, Bhaduri’s name also appears to be omitted from authorship on the related poster (See Exhibit 19) that exposed the trade secret, indicating a pattern of selective exclusion intended to misrepresent the actualities of the ongoing scheme as a coverup to lie to officials arguably speaking. Bhaduri recently received a lucrative grant from the NIH/NIMH, for the same consortium group in question (See Exhibit 22).

Furthermore, what is even more troubling is that Gulesserian brought the paycheck and administrative misconduct issues to the attention of the Neurobiology department’s Human Resource representative Nguyen (See Exhibit 17) , who effectively neglected to address the matter and continued to neglect all the matter(s) raised in a complaint made to Nguyen back in April 2024 (See PDEH).

Rather than taking appropriate action, HR representative Nguyen appeared to turn a blind eye to the administrative misconduct of their departmental colleague and supervisor Mark Lucas along with their own deliberate bad faith acts. Furthermore, the individuals in charge of payroll are the very same individuals who are in charge of the administrative work are retaliating against Gulesserian by intentionally manipulating the system (See Exhibit 25).

For instance, only after Gulesserian made a protected disclosure to Shelly Frohrip (See exhibit(s) 10 and 11 also see exhibit 23), Helen Nguyen would only then attempt to respond on any matters merely 20 days after the initial email that received no response (see Exhibit 24). As a result, despite being clearly put on notice, the Human Resource representative Nguyen failed to take any proactive measures to investigate the issue or hold the responsible individuals accountable for their unacceptable and retaliatory behavior and instead intentionally participated in Gulesserian not being able to get paid for hours worked without limitations. It should not take an email or a call from healthcare accommodations office manager Shelly Frohrip to have a Human Resource analyst, Nguyen, or Chief Administrative Officer, Mark Lucas, to act accordingly with university rules, policy, and procedures at UCLA along with state and federal rules, laws, and procedures respectfully (See exhibit 10 and See Exhibit 24 after).

Even when Shelly Frohrip attempts to do the right thing, the administrative individual(s) from the Neurobiology department do not listen to Shelly’s commands rather, they try to falsify



information to Shelly Frohrip to make it seem as if everything has been just fine with Gulesserian when in fact internal manipulation of the system is going unnoticed, hours worked are not being paid, and the retaliation continues on (See exhibit 26). Subordinate Helen Nguyen, and CAO Mark Lucas should be considered of the many other respondents (See section III below to further illustrate evidence a group of PI's and students are all acting in bad faith with the knowledge, intent, behavior, and pattern of practices to cause harm to Gulesserian, that should be held accountable for administrative misconduct, academic misconduct, research misconduct, among many other issues pertaining to Gulesserian's protected disclosure(s), complaint(s) and/or the adverse action(s) that followed without limitation for Gulesserian making those protected class disclosures without limitations (See exhibit 13 and See exhibit 27, & exhibit 28).

In fact, Gulesserian was forced to personally audit his own timesheet records (See Exhibit 16) to uncover that it was in fact Chief Administrative Officer Mark Lucas who had seemingly fraudulently manipulated the timesheet system to make it appear as though Gulesserian had inputted an inflated number of hours worked after Gulesserian had already approved his times uploaded properly at the time by Helen Nguyen (See Exhibit 16). Had Gulesserian not discovered and preserved this evidence, the respondent(s) bad faith conduct would once again have continued unchecked and claims likely dismissed or pushed aside without the proper investigation taking place with all the proper respondents named who all acted in bad faith jointly, collectively, and severely in this fraudulent scheme involving violations of federal, state and university rules laws and or procedures among other things without limitation knowingly, intentionally, with motive, and bad pattern of behaviors. Some of the very same retaliatory acts that occurred during Gulesserian's FMLA including but not limited to intentional lockouts from the LOAN systems (See PDEH FMLA), intentional delays processing Gulesserian's vacation/sick hours to offset the hardships faced financially during those times (See PDEH FMLA portion), unlawfully placing Gulesserian on administrative leave the day Gulesserian returned to work from FMLA, (See PDEH FMLA) and now the same individuals who intentionally intended to harm Gulesserian continues to harm Gulesserian presently in a materially and negatively manner that does not coincide with Gulesserian's employment terms with employer UCLA. There is an ongoing cause(s) of harm from the past to the present and likely in the future these bad acting respondent(s) should be stopped, essentially cease, and desist from all malpractices collectively speaking.

This pattern of conduct is a direct continuation of the retaliatory behavior Gulesserian faced after making numerous protected whistleblower disclosures regarding theft, discrimination, misconduct, misappropriation, among other serious issues without limitations (See PDEH also see all exhibits below without limitations), and these adverse actions continue to harm Gulesserian materially and negatively which is not in parallel with Gulesserian's employment terms with employer UCLA. These disclosures were made in good faith and without limitation, and the ongoing retaliation against Gulesserian must be addressed as a matter of the Whistleblower Protection Policy, ethics, law, and state laws, federal laws, along with UCLA rules, procedures, and policies without limitations (See PDEH).



The following sections will demonstrate, in evidence-based format, a pattern of retaliation encompassing critical areas including knowledge of a protected disclosure, identity of bad acting respondents, intent, motive, & pattern of behavior among other matters without limitation:

**Section(s): I) retaliatory non-payment for hours worked, &  
II) intentional administrative misconduct**

## **I. Protected Activity**

Gulesserian engaged in multiple protected whistleblower activities under California Labor Code § 1102.5, the California Whistleblower Protection Act, and related provisions without limitations. Among the numerous protected formal complaints and/or activities were without limitation:

- On or about **April 1 & April 23, 2025**, Gulesserian submitted protected disclosures to **Shelly Frohrip**, including:
  - Reports of violations of law, regulation, and policy—specifically fraud, abuse of authority, and administrative misconduct by respondent(s) who had deliberate intent, knowledge, motive, and pattern of behavior (See Exhibit 10 & 11).
  - Good faith internal complaints concerning mismanagement, ethical misconduct, and improper governmental activity (See Exhibit 10 & 11).

These disclosures qualify as protected activities under state, & federal law, along with university rules, policy, or regulations without limitations. They were made in good faith in accordance with Gulesserian's legal obligations and ethical responsibilities, among other things.

## **II. Employer Knowledge**

The **UCLA Department of Neurobiology** had actual and constructive knowledge of both the protected disclosures and the associated ongoing retaliation investigation being conducted by the respectful Catherine Kramer; *Investigations Manager & Retaliation Complaint Officer, UCLA office of compliance*, as demonstrated by the following:

- Chief Administrative Officer Mark Lucas had knowledge (see exhibit 29) of the ongoing whistleblower investigation specifically by Investigator Catherine Kramer, as early as March 9, 2025, through email if not earlier (See exhibit 29);
- Human Resource Representative Helen Nguyen was formally notified of payroll discrepancies, including overpayments (See Exhibit 30), but failed to act until after protected disclosure and retaliation concerns were raised with Shelly Frohrip UCLA healthcare accommodations office manager (See exhibit 10 & 11);

- Both Helen Nguyen and Mark Lucas were placed on notice as early as February 28, 2025, regarding pay irregularities and administrative misconduct (See exhibit 30), yet no timely corrective action was taken to deter the bad acts (See exhibit 24) similar to what had occurred with Helen Nguyen and Mark Lucas back in April 24, 2024 when reports were made to the department that Bennett Novitch and Samantha Butler verbally assaulted Gulesserian on the first floor of the CHS in retaliation for whistleblowing their misconduct (See exhibit 31). Therefore, without limitations, Samantha Butler, Mark Lucas, Helen Nguyen, members of the consortium, among many others should also be considered as respondent(s) for this intentional coordinated fraudulent scheme (See all evidence past and present).

The department of Neurobiology therefore without a doubt knew or should have known of both the protected activities as early as April 2024, and the risk of retaliation, particularly since the individuals involved in the direct retaliation are also in charge of the department's payroll administration (see exhibits 25) and are the reason in part for Gulesserian not being paid for hours worked as a form of retaliation (See exhibit 5).

### **III. Adverse Personnel Actions**

In direct response to Gulesserian's protected disclosures, the University and individuals acting on its behalf undertook the following adverse employment actions without limitations:

1. **Unlawful salary reduction** by failing to pay on a timely manner (see exhibit 5).
2. **Manipulation and falsification of timekeeping records**, including but not limited to:
  - Tampering with submitted timesheets (see exhibits 16).
  - Intentional locking out access to the payroll system (see exhibits 5).
  - Failure to pay wages for hours lawfully hours worked (see exhibit 2)

These actions without limitations represent significant and material changes to Gulesserian's terms of employment and were taken after and because of Gulesserian's whistleblower activity among other things.

## IV. Causation

There is a direct and compelling causal relationship between Gulesserian's protected disclosures and the adverse employment actions imposed. Specifically without limitations:

- Retaliation escalated following reports to both University administrators and or investigators (See exhibit 31) as early as 2023 and continued on with numerous respondent(s).
- The same individual(s) who previously retaliated prior and during Gulesserian's FMLA leave — by unlawfully locking access to the LOAN system, manipulating paperwork, deliberately delaying the processing of Gulesserian's vacation/sick hours by 6-8 weeks (See PDEH FMLA) — have now re-engaged in bad faith acts (See Exhibit 16, 1, 10, 11)) following these renewed disclosures.

Without limitations, the pattern of retaliation demonstrates sustained animus against Gulesserian for exercising protected rights, particularly concerning reports of wage and hour violations, ethical misconduct, and administrative abuse without limitations. This conduct, among other actions, constitutes unlawful retaliation in violation of California and federal whistleblower protection laws, as well as UCLA's own procedures, rules, and policies designed to protect employees from retaliation for engaging in protected activities.

*The following section will return to the original issue concerning the Consortium Group, which Gulesserian firmly believes is engaged in a coordinated scheme to commit fraud, with actions and decisions that appear deliberately structured to undermine both University policy and federal law.*

### **Section III) Denial of inventorship credit along with associated employment benefits per the patent policy as a form of retaliation among other things.**

#### ***I. Introduction***

This is a formal complaint pursuant, but not limited to, the California Whistleblower Protection Act (Government Code § 8547 et seq.), the terms and conditions of Gulesserian's employment under the University of California Patent Acknowledgment, and the State Oath of Allegiance among other things (See exhibit) executed at the start of Gulesserian's employment (See PDEH) among many other state, and federal laws without limitations (See PDEH PowerPoint).

Gulesserian is submitting and alleging this formal retaliation complaint to document and contest acts of unlawful retaliation taken against Gulesserian following the lawful disclosure(s) of serious misconduct and federal violations without limitations. These retaliatory acts have resulted in the wrongful denial of employment benefits (See exhibit 32), including intellectual property rights, inventorship recognition, and compensation to which Gulesserian is entitled to under University policy and California law and most importantly federal law and employment benefit privileges per contracts signed with UCLA (See exhibit 32).

#### ***II. Background***

- Gulesserian is a **staff researcher** who is employed by the University of California, Los Angeles (UCLA), where Gulesserian has been employed since June 28, 2022.
- In compliance with UC employment requirements, Gulesserian signed the *State Oath of Allegiance* (Gov. Code § 3100–3109) and the *Patent Acknowledgment* (UPAY585) (Exhibit 32), legally binding Gulesserian to assign invention rights made during the course of university employment among other things (See exhibit 32).
- On 09/11/2023, Gulesserian made a novel Accidental scientific discovery during the course and scope of Gulesserian's employment at UCLA (See PDEH ACOP Manuscript).
- In accordance with university policy, Gulesserian disclosed this invention to the appropriate university office for potential patent processing and royalty sharing on or about January 12, 2024 to Vice Chancellor of Technology Development

Groups Amir Naiberg followed by dialogue with UCLA's Chief Intellectual Property Officer Charanjit Arora (See Exhibit 33).

### ***III. Whistleblower Disclosure(s)***

- On 09/10/2024 (See PDEH), Gulesserian submitted numerous whistleblower complaint(s) formally, and respectfully, to UCLA's Locally Designated Official Vice Chancellor Mark Krause, reporting without limitations... fraud, safety violations, misuse of research funds, misappropriation of government owned trade secrets among many other matters (See PDEH).
- Gulesserian's protected disclosure(s) were made in good faith and were indeed a protected activity under the California Whistleblower Protection Act and Gulesserian's constitutional and statutory obligations under the State Oath of Allegiance among other things (See PDEH + new complaint).

### ***IV. Retaliatory Acts and Denial of Benefits based off of whistleblower status***

Following Gulesserian's numerous protected disclosure(s), Gulesserian experienced the following *adverse employment actions without limitations*:

1. ***Denial of rights*** on the invention Gulesserian lawfully disclosed to UCLA's Technology Development Groups (See exhibit 8 & 34 );
2. ***Withholding of Patent Royalty Benefits*** to which Gulesserian is entitled under the UC Patent Policy (See PDEH and new complaint);
3. ***Removal or Delay of Patent Processing*** in a way that undermines Gulesserian's contribution and the exposure of the trade secret (See PDEH);
4. ***Exclusion from research grants, development opportunities, or professional advancement*** tied to the invention or its applications (See PDEH and current complain);
5. ***Derogatory remarks or veiled threats*** from supervisors and or employees of UCLA (See PDEH).

*The following section will return to the original issue concerning the Consortium Group, which Gulesserian firmly believes is engaged in a coordinated scheme that did and/or committed fraud, with actions and decisions that appear deliberately structured to undermine both University policy, state and federal law respectfully.*

**Section IV: *Retaliatory Exclusion from Intellectual Property Recognition and Advancement***  
***See Regents Policy 5105 in conformity with Provost Browns' Objectives related thereto as to Advancement of Career Harms, among other things. (See Exhibit 6 & 9).***

This section outlines the protected class activities engaged in by Gulesserian and identifies, in part and without limitation, the intentional discriminatory and retaliatory conduct suffered by Gulesserian at the hands of certain UCLA personnel including but not limited to principal investigators (UCLA Consortium group), UCLA MD/PHD graduate students and other personnel without limitations (See exhibit(s) 13. These acts resulted in concrete and ongoing legal and equitable harms—including career interruption, denial of promotion and recognition, reputational harm, economic losses, and emotional distress among other things without limitations (See Exhibit 6 & 9).

Furthermore, as shown through the factual pattern and evidence already submitted and incorporated herein by reference (See PDEH), Respondent(s) engaged in intentional, knowing, and sustained misconduct with motive, violating both statutory and constitutional protections without limitations. These acts are actionable under state and federal law among others.

***II. PROTECTED ACTIVITIES UNDERTAKEN BY GULESSERIAN without limitations.***

Without limitations, Gulesserian engaged in various protected activities without limitations under federal and state laws , University rules, procedures, and/or policies include but are not limited to:

- 1. Reported discrimination based on race and national origin*
- 2. Reported mental health discrimination and requested accommodations*
- 3. Exercised rights under the Family and Medical Leave Act (FMLA)*
- 4. Reported and opposed FMLA retaliation*
- 5. Engaged in whistleblower activity, including but not limited to; reporting fraud and misuse of federal funds*
- 6. Reported whistleblower retaliation*
- 7. Reported wage and hour violations*



8. *Raised concerns regarding mismanagement of employment benefits*
9. *Asserted rights under an employment contract and reported breaches; Regents Policy 5105*
10. *Reported fraud and concealment of federally funded research and donor information*

Without limitations, these activities are protected under various laws including but not limited to: Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act (ADA), Family and Medical Leave Act (FMLA), Whistleblower Protection Act, False Claims Act, Fair Labor Standards Act (FLSA), California Fair Employment and Housing Act (FEHA), ERISA, UC Faculty Code of Conduct and Academic Personnel Manual among many other things without limitations (See also PDEH without limitations).

### **III. HARMS SUFFERED BY GULESSERIAN: LEGAL AND EQUITABLE IMPACTS**

Gulesserian continues to suffer both material and irreparable negative harm as a direct result of the intentional acts and omissions of UCLA officials, including (but not limited to) Bennett Novitch, Mark Lucas, Helen Nguyen, Samantha Butler, the sspysgene UCLA consortium group, members from the Samantha Butler/Bennett Novitch labs among many others without limitations.

Just to emphasize: “Gulesserian continues to face “..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination ...” (Vice Chancellor Krause) in ways that are systemic, ongoing, and grounded in institutional bias and retaliation, including—but not limited to—academic, professional, and personal domains— which are not coinciding with Gulesserian’s employment terms with employer UCLA (See PDEH).

### **IV. Intellectual property CREDIT AND PROMOTION: UCLA POLICIES AND RETALIATORY EXCLUSION –**

*Novitch Lab and Co-Conspirators Violated, Regents Policy 5105 (See exhibit 6 & 9), among other things, thus when respondents Novitch, Lucas, Nguyen, and each of them without limitations became aware of Gulesserian’s whistleblower activities, they undertook and conspired jointly and severely, and continue to do so to this date with ongoing paycheck wage and hour discrimination among other things being reported herein in this instant complaint as more fully stated herein. See 04 April 2022 Memorandum of Michael T. Brown Ph.D. Provost and Executive Vice President for*

*Academic Affairs establishing further how Respondents and each of them harmed and continue to harm Gulesserian by acts to foreclose examples of activities that might be presented in the review process from Gulesserian's manuscript, and accidental inventions, that are being foreclosed from materializing into contributions elevated under the UC Framework (See exhibit 6 & 9). See also denial of 955 letter (See exhibit 8).*

But for the discrimination and retaliation Gulesserian experienced (See exhibit all complaints), Gulesserian's significant intellectual property (IP) contributions would have directly and positively influenced promotion and tenure evaluations, pursuant to UCLA's and the UC system's academic criteria (See exhibits 6 & 9).

Key Facts:

1. **UCLA recognizes patents and IP as scholarly output** under the UC Academic Personnel Manual (APM), particularly in innovation-driven fields (See exhibit 6 & 9).
2. **Gulesserian's inventor manuscripts and discoveries**, which were improperly excluded or minimized, would have been presented as part of a scholarly dossier ( See PDEH ACOP).
3. **Bennett Novitch and others intentionally interfered with Intellectual Property disclosures and recognition**, including by hiding grant information and obstructing UCLA TDG engagement (See PDEH).
4. **Bennett Novitch and affiliates intentionally concealed federally funded project data and donor correspondence**, frustrating UCLA's ability and duties to report potentially patentable innovations (see Gulesserian Manuscript forwarded to UCLA TDG) (see emails showing precluding giving the data, so as to intentional frustrate duties to report to the to the Federal government(NIH/NIHM), and or CIRM, among others (See entirety of complaints).

Attached is PDEH documenting long term systematic intent, knowledge, behavior, motive and patterns," further establishing that Gulesserian's protected class status was knowingly and willfully violated by numerous respondent's numerous times without limitations (See PDEH & all complaints).

The discriminatory and retaliatory exclusion from promotion and recognition constitutes *a denial of professional* equity and directly violates UCLA's stated criteria under APM and related policies (See exhibit 6 & 9). The result was the foreclosure of advancement, recognition, and financial reward, among other things amounting to lasting reputational and material damage for Gulesserian.

## ***V. DAMAGES AND REMEDIES REQUESTED without limitations***

The harms suffered by Gulesserian are both economic and non-economic, and include but are not limited to the following:

- Loss of academic promotion and tenure opportunities without limits personnel advancements under Provost Brown's objectives and UC policy 5105 among other things (See exhibit 6 & 9).
- Foreclosed royalties and startup equity associated with Intellectual Property among other things (See exhibit 6 & 9).
- Emotional distress and psychological trauma from hostile work environment among other things (See PDEH and current complaint)
- Reputational damage within UCLA and broader academic/biotech community among other things.
- Any other remedies that are discretionarily given to Gulesserian or to the department of compliance from the university.

As outlined all causes have materially and negatively impacted Gulesserian's employment terms with employer UCLA.

As previously alleged in this new whistleblower retaliation complaint dated 5/5/2025 and all prior complaints (See PDEH), these harms are not speculative (See exhibit 2 & 3). They are specific, ongoing, and growing and continue to cause harm to Gulesserian as "...A management action that affects the Complainant's existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination..." (Vice Chancellor Krause).

## **VI. EVIDENCE TO ESTABLISH INTENT**

### **I) Motive**

### **II) Intent**

### **III) Knowledge**

### **IV) Pattern of Behavior**

The evidence presented establishes that the pattern of misconduct directed at Gulesserian was neither accidental nor incidental, but rather intentional and retaliatory in nature (See exhibit(s) PDEH & current complaint). The individuals involved exhibited a consistent and escalating course of conduct, clearly demonstrating motive, intent, knowledge, and a pattern of behavior that reflects a deliberate effort to retaliate against Gulesserian (See all complaints).

The motive behind these actions was to suppress Gulesserian's protected activities and professional advancement, which directly stemmed from his whistleblowing and previous protected disclosures (See exhibit PDEH). The intent was to punish, discredit, and undermine Gulesserian for engaging in these activities. Each adverse action taken against Gulesserian was done with full knowledge of Gulesserian's protected activity and the legal protections afforded to Gulesserian as a whistleblower.

Furthermore, the pattern of behavior is evident in the repeated and coordinated acts of retaliation, including interference with Gulesserian's intellectual property rights, exclusion from professional opportunities, falsification of records, and the denial of employment benefits Gulesserian was lawfully entitled to under contract (See exhibit). These acts were not isolated incidents but part of a sustained, deliberate campaign to deter Gulesserian from fulfilling his legal duties, stifle innovation, and punish Gulesserian for lawfully exercising his rights. The clear connection between the timing of Gulesserian's protected activities and the retaliatory actions taken against Gulesserian reinforces that the misconduct was systematic, intentional, and retaliatory in nature (See all complaints).

**Section V. Summary and Synthesis of Harm to a UCLA Employee Whistleblower Based on Violations of Innovation Transfer and Entrepreneurship Policies ; “..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination...” (Vice Chancellor Krause)**

At all relevant times, and without limitations among other things Gulesserian is A UCLA employee who acts as a whistleblower, and filed many other protected activity complaints among other matters, in response to violations of the University of California's policies on innovation transfer and entrepreneurship (See Exhibit 6 & 9) and Gulesserian had and continues to experience significant harm as to his employment in several ways, just to name a few as follows:

- “Applied research and/or research translation through public-private partnerships
- “Research and/or development funding or support from industry, private ventures, or other for-profit sources”
- “Technology transfer-related grants and contacts”
- “Contributions to team science, such as externally-sponsored centers and institutes, and other collaborative systems for scholarly discovery”
- “New approaches and innovative methods for teaching and learning”
- “Creation of intellectual property and disclosures submitted”
- Patents, copyrights, or licenses of inventions, processes, procedures, software, or creative works – applied for, pending, and awarded
- License or royalty income received
- Creation and contributions to start-up companies or services
- Commercialization and impact of research and other scholarly activities
- Mentoring, nurturing, and encouraging innovative, inventive, and entrepreneurial drive in students and peers
- Supporting diversity of culture and perspective in innovation transfer and entrepreneurship through sponsorship and visibility of translational research by persons underrepresented in these areas
- Providing students with translational research and entrepreneurial experiences that provide a connection to real-world problems”...

( See exhibit 6 & 9 without limitations), these harms can be categorized into professional, emotional, and financial impacts, among others, all of which had, are having, and will continue to have long-lasting effects on whistleblower Gulesserian’s career and well-being.

**1. Professional Harm + “..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination...” (Vice Chancellor Krause):**

As was, and is being reported whistleblower Gulesserian faced, and still faces, direct retaliation from supervisors or colleagues, which did, and still does manifest as demotion, denial of promotions, or exclusion from important projects and collaborations along with denial to assign any IP rights to inventor and creator Gulesserian (See Exhibit PDEH). Moreover, in the Context of Policies presented under Provost and Executive Vice President for Academic Affairs, Michael T. Brown, Ph.D. including without limitations Regents Policy 5105 as underscored by the Provost Brown (See Exhibit 6 & 9), Gulesserian faced, is facing and will continue to face significant harms negatively effecting employment as **“..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination...” (Vice Chancellor Krause)**... for Gulesserian reporting violations of the UC’s policies without limitations to policy 5105 and those underscored by Provost and Executive Vice President for Academic Affairs, Michael T. Brown, Ph.D. without limitations (See Exhibit 6 & 9). New Evidence attached (See attached Complaint) herein coupled with prior evidence (See PDEH) for intent, motive, knowledge, patterns of behavior among other things, conclusively establish on going harms and violations, particularly upon Gulesserian observing and reporting violations such as inadequate support for innovation initiatives, improper management of intellectual property, violations of civil rights, among others without limitations, and upon reporting of these violations the evidence attached show that Gulesserian continues to experience adverse employment actions (wage and hours not paid or delayed, technology transfer values denied, exclusion from key projects or duties, increased scrutiny, and harassment, to name just a few along with complete isolation (See exhibit(s)PDEH and new complaint especially Exhibit 6 & 9).

Moreover, this retaliation undermines the employee Gulesserian’s professional reputation and credibility within UCLA and the greater academic community, making it difficult to engage in future research or entrepreneurial activities, among other things.

The adverse actions taken against whistleblower Gulesserian also evidently discourage others from reporting similar violations, creating a UCLA culture of fear and silence that stifles innovation and undermines the university's mission to translate discoveries into societal benefits (See 04 April 2022 Office of the Provost Policy Memorandum Exhibit as well as UC 5105 Policy Exhibit 6 & 9, also see exhibit 10 and 11).

**2. Emotional and Psychological Harm; “..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination...” (Vice Chancellor Krause):**

The stress and anxiety associated with whistleblowing can lead to significant emotional distress (See attached requests for Reasonable Accommodations; exhibit 35). Gulesserian has and continues to experience feelings of isolation, fear of further retaliation, and a sense of betrayal from colleagues and supervisors (See emails to Shelly and Paul all this month without limitations Exhibit 36). This ongoing emotional toll resulted and continues to result in decreased job satisfaction, increased anxiety, and even depression. The healthcare damages and harms to Gulesserian, without limitations Gulesserian’s psychological impact of being targeted for speaking out against unethical practices did lead and arguably still continues to lead to a diminished sense of self-worth and professional identity ( See exhibit 35, and 36), further exacerbating the harm experienced due to the ongoing toxic and hostile work environment that is yet to be precluded by UCLA (See exhibit 23).

**3. Financial Harm “..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination...” (Vice Chancellor Krause):**

The latest wage and hour violations for money earned being not paid (See Exhibit 2 & 3) to Gulesserian’s paycheck due to objectively measurable discrimination and/or retaliation, without limitations, also has and continues to have severe financial consequences for whistleblower Gulesserian (See PDEH). Adverse employment actions as those being reported previously, and presently and identified as if herein in this instant complaint, with obvious intentional motive and intent of bad actors to act towards Gulesserian’s eventual wrongful demotion and/or termination, are obviously leading to lost wages and benefits, work privileges creating economic instability of the worst kind (See exhibit 2 & 3). Without limitations, Whistleblower Gulesserian also incurred, incurs, and will likely incur tremendous legal fees while pursuing claims of foreclosed and converted property interests, discrimination, and retaliation, among other things, further straining Gulesserian’s financial resources. Additionally, the long-term impact on career advancement and earning potential due to the bad acts of UCLA supervisors and other UCLA employee/agent co-conspirators, resulted in and are continuing to result in significant financial losses over time, as Whistleblower Gulesserian is denied seamless reasonable accommodations (See exhibit 35, a non-hostile work environment (See exhibit 23), and honest due process with meaningful opportunity to participate and thus promote, as Gulesserian struggles to find a new UCLA non-hostile work environment and non-civil rights violating employment opportunities in an environment that is hostile to whistleblower Gulesserian and violative of Whistleblower Gulesserian’s Civil Rights without limitations.



**4. Impact on Innovation and Research “..A management action that affects the Complainant’s existing terms and conditions of employment in a material and negative way, including but not limited to, failure to hire, corrective action (including written warning, corrective salary decrease, demotion, suspension), and termination...” (Vice Chancellor Krause):**

As has been reported in the past (See PDEH) and continues now and is continuing to be reported to UCLA (See current complaint), the harms experienced by whistleblower Gulesserian extends beyond the individual, affecting the broader academic environment at UCLA. As the evidence attached establishes violations of innovation transfer and entrepreneurship policies without limitations are trying to be made to go unreported or unaddressed by UCLA supervisors including but not limited to Bennett Novitch, Samantha Butler, Mark Lucas, Helen Nguyen, consortium group, among others, the university's ability to fulfill its mission of translating research into societal benefits is compromised (See exhibit 6 & 9). This not only hinders the potential for new discoveries to reach the public but also diminishes the university's reputation as a leader in innovation and research per Provost Brown’s objectives (See exhibit 6 & 9).

In summary, Gulesserian as a UCLA employee who acted and continues to act as a whistleblower in response to evidence of violations of innovation transfer and entrepreneurship policies faces multifaceted harm, including professional retaliation, emotional distress, financial instability, and a negative impact on the university's mission, just to name a few without limitations. Recognizing and addressing these harms is crucial to fostering a culture of integrity and accountability within the academic community, and thus this formal complaint and plea for help is submitted and alleged.

**1. Employment Status:** Gulesserian is at all relevant times employed by UCLA, including the duration of employment, to establish the employer-employee relationship at all relevant times for all matters alleged and submitted.

**2. Protected Activities:** Gulesserian, without limitations and as noted above, alleged and continues to allege that Gulesserian engaged in a series of protected activities, among others and without limitations, includes reporting or disclosing information about unlawful acts or violations of regulations, policies, or laws incorporated by reference any and all prior correspondence and complaints between UCLA it's agents assigns or other employees and Gulesserian, without limits as well as all reporting misconduct related to IP denials (See Exhibit 34) ) of any IP rights ( See exhibit 8), innovation transfer and

entrepreneurship policies, wage and hour (See exhibit 6 & 9), denial of reasonable accommodations (See exhibit 35), not precluding hostile workplace settings (See exhibit 23), among the others as the evidence establishes without limitations.

**3. Ongoing and Continuing Violations:** Among many of the prior unlawful activities reported, the new wage and hour, denial to assign any “IP rights” (See exhibit 8) other noted harms violating Gulesserian’s civil rights, contracts (See exhibit 32), benefits (See exhibit 32) as well the unlawful activities or violations reported (See PDEH) including without limitations notice and evidence of how UCLA supervisors failed to adhere to the established policies on innovation transfer and entrepreneurship (See exhibit 6 & 9) among others, such as neglecting to recognize contributions to research, or retaliating against Gulesserian for engaging in furtherance of the entrepreneurial technology transfer activities underscored by Executive Vice Provost Brown, under the memorandum delivered to UC officials on or about 04 April 2022 Document (See exhibit 6 & 9) as well as likely timely federal, and state reporting requirements without limits (See Bayh-Dole-Act).

**4. Reporting Mechanisms:** The Protected Disclosure Evidence Handbook (See PDEH) + any and all instant documents provided here in this instant complaint establish detailed communications with supervisors, department authorities, human resources, or other appropriate authorities within UCLA; without limits establishing knowledge, intent, motive, human behavior patterns, and cause and effect harms thereof, without limitations (See all evidence).

**5. Timing of the Reporting Illustrated by Documentary Evidence:** The evidence provides many of the dates and/or time frames during which the protected activities occurred, establishing a timeline that connects Gulesserian’s reporting of protected activities to subsequent adverse actions by UCLA, & UCLA bad actors, without limits (See instant complain + PDEH).

**6. Adverse Employment Actions:** It is alleged that Gulesserian experienced and is continuing to experience adverse employment action as a result of the whistleblowing (See Exhibit 23), among other reasons without limitations to other protected activities. This could include demotion, termination, harassment, or any other negative impact on Gulesserian’s employment status without limitations.

**7. Causal Connection Documentary Evidence:** The attached documentary evidence demonstrates a systematic and continuous causal link between the protected activities

(coupled with reporting the violations related to those protected activities) and the adverse employment actions remaining all to numerous and ongoing ( see PDEH + new complaint) as there is obvious objective documentary evidence even establishing that UCLA was aware of the reported protected activity issues (See PDEH also see Mark Lucas's Email to Gulesserian on the 9<sup>th</sup> of March without limits where Lucas identifies the Investigator of the case to Gulesserian), without limitations and not limited to the whistleblower activities; yet adverse actions were continued to be taken (See instant complaint), and as the latest evidence establishes continue to be taken (See exhibit 23), in retaliation for those protected activity disclosures (See PDEH), among other things without limitation.

8. Documentary Evidence establishes the all to numerous Economic and Non-Economic **Damages and Harms** (See PDEH + present complaint), as the latest new evidence specifies the damages suffered based on unpaid or otherwise manipulated timesheets for hours worked versus moneys paid (See exhibit 2, 3, 16 .. among others), also as to technology innovation violations without limitations to IP rights denied (See exhibit 8), wage and hour violations include without limits lost wages (see exhibit 2, 3), lost vacation hours, lost sick hours, emotional distress, and any other economic or non-economic damages incurred due to retaliation or other unlawful animi.

9. **UCLA's Knowledge:** It is alleged that UCLA ( and or relevant supervisors, employees; Bennett Novitch, Samantha Butler, Mark Lucas, Helen Nguyen, Cendi Ling, Natella Balliaouri, Novitch lab members, Butler lab members, **along with the Consortium Group** : Bhaduri, Aparna <ABhaduri@mednet.ucla.edu>, Wells, Michael F [Human Genetics] <MFWells@mednet.ucla.edu>, Geschwind, Daniel H. <dhg@mednet.ucla.edu>, Damoiseaux, Robert <RDamoiseaux@mednet.ucla.edu>, Claudia Nguyen [claudianguyen95@g.ucla.edu](mailto:claudianguyen95@g.ucla.edu) Jacqueline Martin [JMMartin@mednet.ucla.edu](mailto:JMMartin@mednet.ucla.edu) , SSpSYGene UCLA Consortium group and affiliates all had knowledge of the whistleblower's protected activities at or near the time of all of the adverse actions taken, without limits. See PDEH and Current Complaint.

## ***Section VI. Federal and State Legal Grounds Without Limitations***

Gulesserian alleges that these action(s) constitute without limitations:

### ***A. Retaliation in Violation of California Government Code § 8547 et seq. without limitations:***

- Gulesserian engaged in protected activity (See PDEH);
- Gulesserian suffered adverse employment actions (See all complaints );
- There is a clear causal link, evidenced by timing, supervisor statements, and the specific nature of the withheld and continued to be withheld benefits (See all complaints).

### ***B. Breach of Employment Contract – UC Patent Acknowledgment without limitations:***

- The University failed to honor its obligation to compensate Gulesserian for inventions developed during the course of Gulesserian’s employment, as outlined in the Patent Policy (See exhibit 32).
- Retaliation interfered with Gulesserian’s contractual right to receive 35% of net royalties and professional recognition among other employment benefits for such inventors without limitations see policy 5105 and the advancing of personnel objectives as outlined by Provost Brown (See exhibit 32).

### ***C. Breach of the Covenant of Good Faith and Fair Dealing without limitations:***

- The university acted in bad faith by weaponizing internal procedures to deny earned compensation and credit to Gulesserian (See exhibit 34 without limits).
- Gulesserian’s benefits were intentionally obstructed because Gulesserian exercised legal and ethical obligations protected by both statute and Gulesserian’s signed oath among other things such as Whistleblowing without limitations (See exhibit 32 & PDEH).

### ***D. Violation of the State Oath of Allegiance (Gov. Code §§ 3100–3109) without limitations:***

- The retaliation Gulesserian experienced contradicts the legal obligations Gulesserian undertook when Gulesserian swore to “support and defend the Constitution of the State of California” and “faithfully discharge the duties” of Gulesserian’s position based on the State of Oath Patent Acknowledgement Agreement work contract (See exhibit 32 ).
- Gulesserian’s act of whistleblowing fulfilled that duty and should not have subjected Gulesserian to retaliation or any adverse actions that are currently remain ongoing (See exhibit 23).

## ***Section VII. Relief Requested without limitations***

Gulesserian respectfully request(s) the following without limitations:

1. *Immediate cessation of retaliatory actions* and restoration of professional standing.
2. *Recognition and restoration of inventorship credit* on the disclosed discovery.
3. Expand the scope of the existing *Investigation based on the new evidence and identities of individuals partaking in the misconduct*
4. *Written assurance of protection from further retaliation.*
5. Make Gulesserian whole for his lost wages

## **Section VIII. CONCLUSION without limitations**

Gulesserian has engaged in multiple protected activities and was subject to retaliation, discrimination, and institutional obstruction, among other forms of misconduct. These harms were not only foreseeable but intentional, designed to suppress dissent, stifle innovation, and punish Gulesserian for exercising his whistleblower rights. The ***intentionality*** of these actions, coupled with the ***motive, knowledge, and pattern of behavior*** exhibited by the responsible parties, makes clear that these acts were intentional deliberate efforts to obstruct, retaliate against, and harm Gulesserian for fulfilling his legal duties and reporting improper governmental conduct among other things. The ongoing harm caused by these retaliatory actions has had a profound impact on Gulesserian's professional and personal life, and this misconduct must be remedied without limitations among other things.

***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.*

*I, Harout Gulesserian, 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 Gulesserian, 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.*

