

# Compelling Evidence Suggesting Research Misconduct and Possible Fraud Occurring at UCLA

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November 6<sup>th</sup>, 2024

**Case Number: EP23681**

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# **SECTION I**

## **DISCLAIMER**

# Disclaimer

Incorporated by reference as if more fully herein is all material that were delivered by certified mail (USPS on September 12, 2024, and received by UCLA on September 13<sup>th</sup>, 2024, and all of the corresponding emails) and all current documents being submitted to Vice Chancellor Mark Krause (November 6<sup>th</sup> 2024). It is submitted that the evidence attached below is sufficient not only to suggest, but also to establish that a potential form of research misconduct has/is occurring within the neurobiology department at UCLA that may be suggesting potential fraud. Accordingly, a formal investigation should be initiated, and a written report detailing the findings of both fact and law must be provided.

\*I Harout Gulessarian make no waivers, no admissions, reserve all rights without limitations to amend, revoke, modify, supplement any and all provisions of the instant complaint, especially as additional evidence is discovered on the matters.

**Disclaimer:** Given the recent misrepresentations of facts at both the departmental and managerial levels, it is imperative that the evidence and supporting documents provided in relation to this complaint remain strictly confidential and not be shared with the respondents. However, the main ideas and key points of the complaint may be communicated to the respondents as necessary for addressing the issues raised. The detailed evidence and memos are confidential between me and the disclosing office, and their confidentiality must be safeguarded to prevent any attempts to cover up, misrepresent, or distort the facts. Ensuring the integrity of the evidence throughout the investigation is crucial to achieving a fair and accurate resolution.

# **Section II**

## **Introduction Without Limitation**

## PREFACE

This document outlines a series of ongoing incidents that indicate a pattern of serious misconduct. Based on the documentary evidence provided below, these incidents began on or around October 2, 2023 (if not earlier) and appear to continue to the present, as new evidence corroborates these occurrences within the Neurobiology Department (see email dated October 2, 2023). Specifically, this concerns my discovery of the protocol involving the small molecule SB-590885 and the Feeder-Free Brain Organoid Protocol I invented/developed at UCLA in the Novitch lab on September 11, 2023. These actions not only violate UCLA's policies but also suggest improper governmental activity that warrants institutional investigation.

Delivered to **Associate Vice Chancellor Mark Krause**, Chief Compliance & Audit Officer and Locally Designated Official  
[mkrause@compliance.ucla.edu](mailto:mkrause@compliance.ucla.edu)

# VALUE OF INVENTION

This new ease-of-use protocol represents a significant advancement that not only benefits both academia and industry but also aligns closely with the university's mission to foster research excellence and innovation. By addressing an unmet demand for cerebral organoid products, this breakthrough protocol offers a faster, more cost-effective solution while maintaining—or arguably exceeding—the quality of existing options, particularly in terms of timely harvest yields of cerebral organoids.

The importance of this development is underscored by the university's commitment to advancing research that has real-world applications. The organoids market spans critical sectors such as developmental biology, disease pathology, regenerative medicine, drug toxicity and efficacy testing, drug discovery, and personalized medicine. Notably, the developmental biology segment held the largest market share in 2022 and is projected to grow at a CAGR of 22.6% during the forecast period. Organoids derived from stem cells or tissues can be engineered to mimic the anatomy and physiology of intact organs, providing a powerful platform for studying human development and modeling diseases with the same depth of analysis typically reserved for nonhuman model organisms.

Furthermore, advancements in 3D bioprinting present remarkable potential for facilitating organ development, as organoid culturing requires significantly less time compared to traditional tissue culture methods. Patient-derived human organoid studies pave the way for innovative approaches in tissue engineering and regenerative medicine, enhancing preclinical testing capabilities in drug development with a heightened focus on tumor modeling and drug discovery activities.

The growth of the organoids market, particularly for developmental biology applications, underscores the recognition of organoids as essential investigative tools in the field of human developmental biology. By supporting this protocol, the university demonstrates its dedication to research that not only advances scientific understanding but also contributes positively to society. Upholding the university's interests in this initiative is crucial for fostering an environment where innovation can thrive and deliver impactful outcomes.

# VALUE OF INVENTION

i. **Who can benefit from this invention;**

Science and industry can benefit as the ease-of-use aspect of this state-of-the-art protocol can be used to reconstruct biological processes (both physiological and pathological) in a cost-effective manner in terms of organoid production.

ii. **How this invention might be used/reused for further insights and/or development.**

Incorporating “Organoid-on -A-Chip” is transformational - merging academia and industry to adopt organic and inorganic growth strategies that expand beyond the organoid market. Step-change reduction in clinical and pre-clinical attrition.

The invention streamlines what is otherwise a complex process into a user-friendly mass-market product, broadening the scope of state-of-the-art organoids. This advancement holds the potential to better serve several key markets, as outlined in further detail below.

This innovative approach will empower biopharmaceutical companies to mass-produce organoids, significantly accelerating advancements in precision medicine. According to recent predictions by the Precision Medicine Coalition, the market for precision medicine is expected to grow by 69% over the next five years. By employing this new protocol, the university can play a pivotal role in meeting the demands of this burgeoning market, aligning with its mission to drive impactful research and innovation.

By fostering such advancements, the university not only enhances its reputation as a leader in scientific research but also contributes to the development of transformative solutions that can improve patient outcomes and advance the field of medicine. Supporting this initiative underscores the university's commitment to leveraging cutting-edge research for societal benefit.

# VALUE OF INVENTION

This innovation holds promise for both academia and industrial use, particularly those engaged in the study of cortical neurodevelopment and the creation of 3D brain-like organoid structures whether as a direct market participant, a passive intellectual property revenue stream, or a bit of both valuation assumptions will undoubtedly continue to evolve in this sector, even as state of the art products and services foster the growth trend from natural evolution in the market demand versus market supply.

Based on the market timing it is submitted that market demand tailwinds propel the instant breakthroughs as ideal for UCLA becoming a key and seminal market developer and participant within the multibillion organoid market.

When making cerebral organoids, the proposed value underlying the instant small molecule SB590885, a bRAF inhibitor, as a key component during neural induction can be a key player in resolving the current challenges of the commercialization and industrialization of the cerebral organoid market which traditionally has failed to employ SB590885 during neural induction in organoids derived from feeder independent iPSC's.

ACOP demonstrates a notable reduction in variability compared to existing protocols, while being able to increase the rate of production, reduction in processing time (10-15 minutes) while being able to efficiently mass produce and scaling while maintaining high-quality organoids across multiple iPSC lines.

# **Misappropriation of UCLA Owned Intellectual Property**

- i. There is ongoing evidence—previously submitted to UCLA and labeled as “B,” alongside new evidence labeled as “A”—suggesting that the Novitch and Butler Labs at UCLA including others may be engaging in activities aimed at misappropriating UCLA’s intellectual property rights and interests. Substantial evidence indicates that my protocol, discovery, and invention were likely being misappropriated. Initially Supervisor Novitch had stated an intent to share the discovery with outside third parties such as his buddies in Wisconsin and New York, then through the NIMH consortium that collectively stated an intent to let NIMH profit from this novel discovery rather than UCLA. Rather than fulfilling their obligation to report to UCLA first for safeguarding UCLA’s trade secrets and determining whether the intellectual property should be pursued before the USPTO for the benefit of UCLA and the State of California, rather than for the gain of outside third parties that intended to undermine the university’s interests.
- ii. This discovery, owned by UCLA, appears to be at the center of a potential fraudulent scheme that requires investigation. The newly gathered evidence, alongside prior submissions to UCLA, suggests misrepresentations of facts aimed at securing government funding through grants, compromising UCLA’s and the State of California’s intellectual property interests. This evidence reveals a clear disregard for UCLA and highlights violations of rights affecting its employees, warranting at least an institutional investigation. Both the prior and newly found evidence indicate a pattern of economically wasteful practices and gross misconduct, which arguably violate UCLA policies and the ethical standards of research integrity as outlined by the Office of Research Integrity (ORI) regulations.

# Predicate example of continuous and ongoing systemic issue to misrepresent the facts.

This document highlights a systemic issue involving the misrepresentation of facts within the Neurobiology Department. It appears that Dr. Novitch is not committed to upholding the truth, which is essential for maintaining research integrity. My accidental discovery was disclosed to Ben early on; however, Ben sought to mislead me by altering the narrative surrounding it. I encourage one to consult with CIPO at TDG, as recognizing the value of an accidental discovery is crucial. Notably, just two days after I shared my findings with Supervisor Bennett Novitch, there were attempts to fabricate narratives instead of accurately presenting the facts, as detailed in the last paragraph of the email below.

BENNETT NOVITCH  
Re: SB  
To: Harout Gulesserian

October 2, 2023 at 3:08 PM

## Evidence B (prior evidence provided to UCLA)

Getting back to the idea about publishing the protocol, if this pans out, and the effects are reproducible and applicable to other cell lines, there will be a few things to assess if we wanted to publish. These include:

1. Are the effects of SB-590885 related to B-Raf signaling, or something else? This would entail testing other inhibitors of B-Raf, as well as downstream effectors of B-Raf including MEK (via MEK/ERK inhibitors like PD98059 and PD0325901), or maybe something upstream like FGF receptor inhibitors like PD-173074. There was a paper that came out in 2022 arguing that treatment of feeder-free hPSC with PD-173074 can allow feeder-free cells to make organoids ([https://www.cell.com/science/pdf/S2589-0042\(22\)01412-2.pdf](https://www.cell.com/science/pdf/S2589-0042(22)01412-2.pdf)). But all of the prior experiments have focused on adding inhibitors to the undifferentiated hPSC, not during the organoid formation steps.

2. What effects are seen in organoids treated with nothing, SB-590885, and possibly other inhibitors (like SB-431542)? This would involve collecting organoids at different time points after drug additions (1 day, 3 days, 9 days, 18 days) for protein extracts and doing western blots for signs of different pathway activations (i.e pMEK1/2 as a readout of B-Raf activity, pERK1/2 for activation of MAPK signaling, pSMAD1/5/8 for BMP signaling, pSMAD2/3 for TGFbeta signaling, etc). We could also collect cells for RNA-Seq to identify downstream genes and molecular pathways that are changing. Single cell-seq also possible but a much more expensive route.

I would not engage on 1 except to see about how SB-590885 compares to SB-431542, but for 2, you might want to think about collecting some organoids at different time points for both RNA and protein collection. One possibility might be to use a kit like this one: <https://www.qiagen.com/us/products/discovery-and-translational-research/dna-rna-purification/multianalyte-and-virus/allprep-dnarnaprotein-mini-kit> which would allow collection of a common sample which can be fractionated into DNA, RNA, and protein for downstream analysis. I've never actually used this kit to know how well it works, but I presume it's not so different from the other methods that we use. This could also be done as parallel samples prepared for RNA collection as we normally do and protein either by adding some protein extraction buffer to the cells or snap freezing and storing at -80°C for later processing.

Probably we should wait until we see how well these methods reproduce, but happy to talk about laying out some of the analysis above.

The one factor I'm not yet sure of is how to introduce the use of SB-590885. Calling it a mistake does not add confidence, and it would be better to come up with some rationale based on other experiments like the idea that suppression of FGF-MEK signaling helps with organoids. This may take some crafting of a suitable narrative.

# **Section III**

## **State Federal and University Laws Pertaining to Research Misconduct Without Limitations**

Without limitations the following slides aim to identify the need for an investigation into whether Federal, State, and University laws, regulations, and rules, without limitation, have been violated in relation to the current situation.



# **Federal Laws on Research Misconduct without limitations**

## **1. Office of Research Integrity (ORI) Policies:**

- Govern federal research misconduct, defined as fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.

## **2. Federal Regulations (42 CFR Part 93):**

- Establishes the procedures for investigating and handling allegations of research misconduct involving Public Health Service (PHS) funded research.

## **3. National Science Foundation (NSF) Misconduct Policies:**

- Defines research misconduct and sets forth procedures for handling allegations of misconduct in NSF-funded research.

## **Bayh-Dole Act - 35 U.S.C. § 200 et seq.**

### **•35 U.S.C. § 200:**

- This section establishes the policy and objectives of the act. It states that “the Bayh-Dole Act permits universities, small businesses, and non-profits to own the rights to inventions made under federal funding.”

### **•35 U.S.C. § 201:**

- Defines the term "subject invention" as any invention of the contractor that is conceived or first actually reduced to practice in the performance of work under a funding agreement. This indicates that the ownership of such inventions lies with the contractor (e.g., universities) and not the NIH.

# Misappropriation of UCLA Owned Intellectual Property State of California perspective without limitation

- **California Civil Code § 3426**, known as the Uniform Trade Secrets Act, protects trade secrets from misappropriation. Misappropriation is defined as acquiring a trade secret through improper means or disclosing or using it without consent.
- The **Feeder-Free Brain Organoid Protocol**, developed through research at UCLA, qualifies as a trade secret under applicable statutes, as it was delivered by me, Harout Gulessserian, to TDG without disclosure to other parties. Supervisor /Principal Investigator Novitch obtained the protocol through TDG's request for MTA and sponsor information. Instead of providing the requested details, Novitch began disseminating my protocol to third parties without my consent or knowledge, thereby obstructing UCLA's rights to this novel discovery. The statute clearly states that unauthorized use or disclosure of this protocol violates California law, as the discovery is considered a trade secret under both federal and state statutes prior to patenting.

## **California State Laws on Research Misconduct**

- 1. California Education Code § 66600:**
  - Addresses fraud in obtaining research grants and provides for penalties.
- 2. California Penal Code § 632:**
  - Criminalizes certain forms of fraud related to research funding and grants.

# Misappropriation of UCLA Owned Intellectual Property

## UCLA Perspective

### **UCLA Intellectual Property Policy**

- Under UCLA's Intellectual Property Policy:
  - Any invention or discovery made by UCLA employees during their employment is subject to the university's ownership and management rights.
  - Employees are **mandated** to disclose any potential inventions or discoveries promptly and to cooperate in protecting these intellectual properties.
  - The University's Policy on Inventions, Patents, and Innovation Transfer requires individuals to assign relevant intellectual property to the University. It mandates the disclosure of inventions to the local licensing office and the provision of necessary documents for legal protection and commercialization. The policy also emphasizes that external agreements must not conflict with obligations to the University.
    - <https://www.ucop.edu/innovation-transfer-operations/innovation/training-and-education/uc-patent-policy.html#:~:text=The%20Patent%20Acknowledgment%20assigns%20inventions,potentially%20patable%20inventions%20to%20UC>
    - <https://ucnet.universityofcalifornia.edu/wp-content/uploads/forms/pdf/upay-585.pdf>
    - <https://tdg.ucla.edu/about/faq/ip-disclosure-ownership>

# Misappropriation of UCLA Owned Intellectual Property without limitation

## Misappropriation

- In this context, misappropriation refers to:
  - The unauthorized use of intellectual property.
  - Actions that could dilute or undermine UCLA's ability to secure and enforce its patent rights.

## Research Misconduct:

- The UCLA Research Misconduct Policy defines actions related to misappropriation as potentially constituting research misconduct when they involve:
  - Deceit or misrepresentation regarding individual contributions to a project.



UCLA Policy 993

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**Retaliation** refers to an adverse action against someone (including a Complainant, witness, or committee member) taken in response to that person's Good Faith participation in a Research Misconduct Proceeding.

### **III. POLICY STATEMENT**

- A. All persons engaged in Research at UCLA are responsible for adhering to the highest standards of intellectual honesty and integrity. Those who supervise Research have a responsibility to create an environment that encourages those high standards through open publication and discussion, emphasis on Research quality, appropriate supervision, maintenance of accurate and detailed Research procedures and results, and suitable assignment of credit and responsibility for Research.
- B. All members of the UCLA community are expected to cooperate in reporting suspected Research Misconduct and in responding to Allegations by acting in Good Faith, providing Research Records and other relevant information, participating in Research Misconduct Proceedings, and refraining from Retaliation or interference with a Research Misconduct Proceeding.
- C. The RIO, on behalf of UCLA, assumes primary responsibility for: 1) assessing Allegations; 2) conducting Inquiries and Investigations and making determinations of whether Research Misconduct occurred; 3) reporting the results of Inquiries and Investigations to Research Sponsors as required; 4) cooperating with Research Sponsors, such as ORI, during Research Misconduct Proceedings, and assisting in administering and enforcing any federal administrative actions imposed upon UCLA or persons at UCLA; 5) filing an annual report with ORI; 6) taking reasonable steps to ensure the cooperation of Respondents and others at UCLA with Research Misconduct Proceedings; and 7) initiating retractions and corrections of any publications, if appropriate.

UCLA is also responsible for determining and implementing sanctions and discipline where appropriate. [See item IV. G.2., below].

# Whistleblower

**Fraud:** Fraud involves intentional deception to secure unfair or unlawful gain, including misrepresentation of facts or misuse of University resources.

**Conversion:** Conversion refers to the unauthorized taking or use of someone else's property, which interferes with the rightful owner's ability to control that property. In this case the issue pertains to conversion of UCLA owned property which is being denied to the University through bad actors.

**Reporting Mechanisms:** Employees are encouraged to report suspected fraud or conversion through established channels, including supervisors, designated officials, or a whistleblower hotline. This has been established with various internal and external agencies already.

**Protection for Whistleblowers:** Individuals who report suspected wrongdoing are protected from retaliation under university policies, ensuring that they can come forward without fear. Unfortunately, I have been retaliated against and continue to be retaliated against for my reporting.

**Investigation Procedures:** All reports of fraud and conversion are taken seriously and investigated promptly by appropriate University officials.

**Consequences of Misconduct:** Individuals found guilty of fraud or conversion may face disciplinary actions, including termination, legal action, and restitution for losses incurred.

**Mandatory Reporting:** State law often requires that employees report suspected fraudulent activities to ensure accountability and compliance with regulatory standards.

## State of California Definition

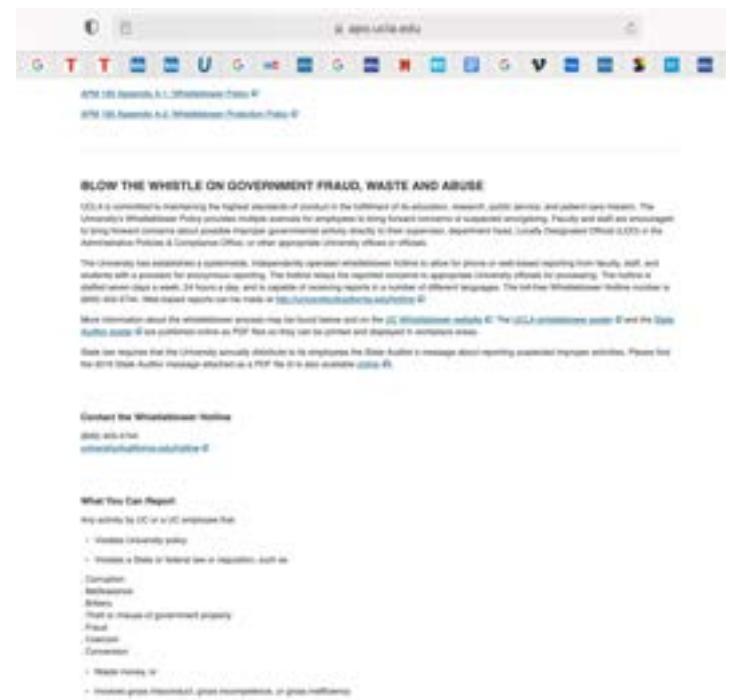
### What is a whistleblower?

A "whistleblower" is an employee who discloses information to a government or law enforcement agency, person with authority over the employee, or to another employee with authority to investigate, discover, or correct the violation or noncompliance, or who provides information to or testifies before a public body conducting an investigation, hearing or inquiry, where the employee has reasonable cause to believe that the information discloses:

1. A violation of a state or federal statute,
2. A violation or noncompliance with a local, state or federal rule or regulation, or
3. With reference to employee safety or health, unsafe working conditions or work practices in the employee's employment or place of employment.

A whistleblower can also be an employee who refuses to participate in an activity that would result in a violation of a state or federal statute, or a violation of or noncompliance with a local, state or federal rule or regulation.

## UCLA Definition



# Whistleblower Retaliation

Based on the circumstances of my situation, it is crucial to reference California Labor Code § 1102.5, which protects employees from retaliation for disclosing information regarding illegal acts or violations of state or federal laws. Additionally, California Government Code § 8547 et seq. establishes protections for state employees who report improper governmental activities, and this directly applies to my case, as it involves state resources and personnel. Furthermore, UCLA's Whistleblower Policy safeguards individuals like me from retaliation when reporting misconduct or unethical behavior, emphasizing the importance of integrity and accountability within the university. The UCLA Code of Conduct and the university's Intellectual Property Policy reinforce the obligation to adhere to established standards and protect the rights of inventors. Given the attempts to undermine my rights, the pressure to waive my intellectual property, and the retaliatory actions I have faced, these California codes and UCLA policies provide a strong basis for asserting that my situation constitutes a clear case of whistleblower retaliation. I am actively pursuing my claims, and I am committed to holding accountable those responsible for the hostile retaliation I have experienced at UCLA.

The Division of Labor Standards Enforcement believes that the sample posting below meets the requirements of Labor Code Section 1102.8(a). This document must be printed to 8.5 x 14 inch paper with margins no larger than one-half inch in order to conform to the statutory requirement that the lettering be larger than size 14 point type.

## **WHISTLEBLOWERS ARE PROTECTED**

It is the public policy of the State of California to encourage employees to notify an appropriate government or law enforcement agency, person with authority over the employee, or another employee with authority to investigate, discover, or correct the violation or noncompliance, and to provide information to and testify before a public body conducting an investigation, hearing or inquiry, when they have reason to believe their employer is violating a state or federal statute, or violating or not complying with a local, state or federal rule or regulation.

### **Who is protected?**

Pursuant to [California Labor Code Section 1102.5](#), employees are the protected class of individuals. "Employee" means any person employed by an employer, private or public, including, but not limited to, individuals employed by the state or any subdivision thereof, any county, city, city and county, including any charter city or county, and any school district, community college district, municipal or public corporation, political subdivision, or the University of California. [[California Labor Code Section 1106](#)]

### **What protections are afforded to whistleblowers?**

1. An employer may not make, adopt, or enforce any rule, regulation, or policy preventing an employee from being a whistleblower.
2. An employer may not retaliate against an employee who is a whistleblower.
3. An employer may not retaliate against an employee for refusing to participate in an activity that would result in a violation of a state or federal statute, or a violation or noncompliance with a state or federal rule or regulation.
4. An employer may not retaliate against an employee for having exercised his or her rights as a whistleblower in any former employment.

Under [California Labor Code Section 1102.5](#), if an employer retaliates against a whistleblower, the employer may be required to reinstate the employee's employment and work benefits, pay lost wages, and take other steps necessary to comply with the law.

# Concerns About Intellectual Property and Compliance with UCLA Policy

Concerns about intellectual property (IP) compliance at UCLA highlight critical issues regarding the mishandling of data and adherence to federal and state laws. UCLA policy underscores the importance of preserving IP, particularly under Federal Patent Law, which grants priority to the first entity to file. I have communicated this principle to Supervisor Ben Novitch on numerous occasions, emphasizing the necessity of securing the original draft manuscripts that I forwarded to TDG. Despite this, there have been no efforts to finalize these documents, and recent evidence suggests that data is being improperly stored on external hard drives outside UCLA's secure environment. Such actions violate UCLA's data security protocols and California state laws, particularly as materials are being shared without proper consent, jeopardizing the first-to-file provisions and risking significant financial damage for both UCLA and myself. This behavior raises substantial concerns about potential misappropriation and theft, further compounding the violations of UCLA policy and regulations regarding Trade Secrets. Throughout my interactions with Supervisor Ben Novitch, I have consistently advocated for adherence to relevant rules and regulations, underscoring the importance of upholding UCLA's best practices.

1. **UCLA Intellectual Property Policy:** I reminded Supervisor Novitch of the university's commitment to protect intellectual property, which requires thorough documentation and proper handling of all research materials and the prompt reporting of potentially patentable inventions whether you think it is patentable.
2. **Federal Patent Law:** I underscored the necessity of complying with the first-to-file principle, which is crucial for securing patent rights and preventing misappropriation of discoveries.
3. **California Uniform Trade Secrets Act (CUTSA):** I highlighted the importance of safeguarding proprietary information, which is protected under state law, thereby ensuring that trade secrets are not disclosed or used without authorization.
4. **California Consumer Privacy Act (CCPA):** I pointed out that all personal and sensitive data must be handled in compliance with state privacy laws to protect individuals' rights and maintain the integrity of research.

# **Section IV**

## **Timeline of Events/Evidence Suggesting Research Misconduct**

# Evidence B (prior evidence provided to UCLA)

September 2023

## Origins

- On September 11, 2023, I made a novel discovery regarding the use of SB 590885 during neural induction and developed a cerebral organoid protocol with significant commercial value. Arguably, UCLA has a rightful intellectual property interest in this discovery, as established by the contractual obligations between me, Harout Gulessarian, and UCLA/the State of California.
- On September 29, 2023, I entered my PI's office CHS 67-200k and disclosed my discovery of a molecule, along with the establishment of a feeder-free brain organoid protocol capable of producing organoids at an impressive rate without compromising quality. This protocol is arguably comparable to, or even superior to, the Pasca protocol, which is commercially valued and patented by Stem Cell Technologies and sold as a kit bundle costing approximately \$500-\$600 per kit.

# Evidence B (prior evidence provided to UCLA)

October 2023

## Acknowledgement of Ownership and Discovery

Following my disclosure to PI/ Supervisor Novitch, I received emails from him on October 2, 2023, in which he acknowledged that I was the one who made this accidental discovery.

The screenshot shows an email interface with the following details:

- From: BENNETT NOVITCH (BN)
- To: Harout Gulesserian
- Date: October 2, 2023 at 12:21 PM
- Status: Unable to verify message signature

The body of the email contains the following text:

As far as I can see from a quick check online, SB-590885 and SB-431542 are distinct molecules, and I have not seen any data showing that they are interchangeable. There is not a lot of information about SB-590885, but what is there shows that it is highly selective for B-Raf, a kinase that acts between Ras and MEK, which feed into the MAP Kinase signaling cascade. As I mentioned earlier, there is some evidence that MAPK signaling can be bad for organoids, so it's possible that the effects of SB-590885 are related to that, but it's really not known. SB-590885 is used as part of the cocktail that helps convert primed hPSC into naive hPSC, so does have some capacity to alter the developmental potential of the hPSC which I could see as being favorable for organoids, but there is zero on what it might be doing when added to organoids as they are forming.

Some predictions are that there should be less MAPK phosphorylations (p-ERK staining, we might have antibodies in the lab), and lots of changes at the level of gene expression. It might help improve cell survival too.

So you are 100% certain that you used SB-590885? There might be quite a bit to be examined if we did want to tout this as a new agent to promote organoid formation.

### To which I responded to PI/ Supervisor Novitch

The screenshot shows an email interface with the following details:

From: Harout Gulesserian (HG)

To: BENNETT NOVITCH

Date: October 2, 2023 at 1:01 PM

The body of the email contains the following text:

Hi Ben,

Thank you for this information! I will look more into this small molecule as well. Yes, I am 100% certain that I am using SB-590885.

Also, by the end of the week I should have two more blocks of d18 organoids collected. Whatever experiments you'd like to run let me know, and we can make it happen!

Harout

[See More from BENNETT NOVITCH](#)

# Evidence B (prior evidence provided to UCLA)

? Show Details

October 2023

 BENNETT NOVITCH  
Re: SB  
To: Harout Gulessarian

October 2, 2023 at 3:08 PM

Getting back to the idea about publishing the protocol, if this pans out, and the effects are reproducible and applicable to other cell lines, there will be a few things to assess if we wanted to publish. These include:

1. Are the effects of SB-590885 related to B-Raf signaling, or something else? This would entail testing other inhibitors of B-Raf, as well as downstream effectors of B-Raf including MEK (via MEK/ERK inhibitors like PD98059 and PD0325901), or maybe something upstream like FGF receptor inhibitors like PD-173074. There was a paper that came out in 2022 arguing that treatment of feeder-free hPSC with PD-173074 can allow feeder-free cells to make organoids ([https://www.cell.com/science/pdf/S2589-0042\(22\)01412-2.pdf](https://www.cell.com/science/pdf/S2589-0042(22)01412-2.pdf)). But all of the prior experiments have focused on adding inhibitors to the undifferentiated hPSC, not during the organoid formation steps.
2. What effects are seen in organoids treated with nothing, SB-590885, and possibly other inhibitors (like SB-431542)? This would involve collecting organoids at different time points after drug additions (1 day, 3 days, 9 days, 18 days) for protein extracts and doing western blots for signs of different pathway activations (i.e pMEK1/2 as a readout of B-Raf activity, pERK1/2 for activation of MAPK signaling, pSMAD1/5/8 for BMP signaling, pSMAD2/3 for TGFbeta signaling, etc). We could also collect cells for RNA-Seq to identify downstream genes and molecular pathways that are changing. Single cell-seq also possible but a much more expensive route.

I would not engage on 1 except to see about how SB-590885 compares to SB-431542, but for 2, you might want to think about collecting some organoids at different time points for both RNA and protein collection. One possibility might be to use a kit like this one: <https://www.qiagen.com/us/products/discovery-and-translational-research/dna-rna-purification/multianalyte-and-virus/allprep-dnarnaprotein-mini-kit> which would allow collection of a common sample which can be fractionated into DNA, RNA, and protein for downstream analysis. I've never actually used this kit to know how well it works, but I presume it's not so different from the other methods that we use. This could also be done as parallel samples prepared for RNA collection as we normally do and protein either by adding some protein extraction buffer to the cells or snap freezing and storing at -80°C for later processing.

Probably we should wait until we see how well these methods reproduce, but happy to talk about laying out some of the analysis above.

The one factor I'm not yet sure of is how to introduce the use of SB-590885. Calling it a mistake does not add confidence, and it would be better to come up with some rationale based on other experiments like the idea that suppression of FGF-MEK signaling helps with organoids. This may take some crafting of a suitable narrative.

**PI Supervisor Novitch's response raised significant red flags regarding potential fabrication and manipulation of data.** He suggested, "The one factor I'm not yet sure of is how to introduce the use of SB-590885. Calling it a mistake does not add confidence, and it would be better to come up with some rationale based on other experiments, like the idea that suppression of FGF-MEK signaling helps with organoids. This may take some crafting of a suitable narrative." This shift from an accidental discovery to a crafted narrative is tantamount to data fabrication. Additionally, please consider the paragraph regarding pSMAD 1/5/8 for BMP signaling, as this may indicate another avenue of misconduct or fraud occurring within the labs as those are links between Bennet's and Samantha's labs.

## Evidence A (New evidence provided to UCLA)

October 2023

### **\*\*October 5, 2023: Gupta's Attempt to Have Me Waive My Rights\*\***

Following this event, another red flag arose when I was contacted by Sandeep Gupta, a postdoc in Supervisor Novitch's spouse Supervisor Samantha Butler's lab. He inquired whether I was using the small molecule SB-4, the original version typically employed by the scientific community. This request struck me as suspicious; it seemed to be an attempt to pressure me into waiving my rights to my discovery by disclosing my use of a new molecule to the Butler lab. Such disclosure could have violated school policy and jeopardized my chances of obtaining a patent.

Historically, SB-4 has been the only version used for brain organoid production, so the inquiry about my work with a new molecule raised further concerns.

The screenshot displays three separate email messages from October 5, 2023, all related to an urgent reagent request:

- Message 1 (Top):** From Sandeep Gupta (sandeeprgupta@gmail.com) at 10:27 AM. To: Harout Gulessarian, Samantha Butler. CC: sandeeprgupta. Subject: RE: URGENT Reagent Request. The message asks if the user uses SB431542 and if they can let him know if they have it. It also includes a forwarded message from Maria Dominguez (maria.dominguez@mednet.ucla.edu) to Dr. Aparna Bhaduri (aparna.bhaduri@mednet.ucla.edu) about the urgent need for SB431542.
- Message 2 (Second from top):** From Harout Gulessarian (harout.gulessarian@gmail.com) at 10:18 AM. To: sandeeprgupta. CC: Samantha Butler. Subject: RE: URGENT Reagent Request. Harout states he can return the aliquot and wait for them to deliver. It will reach out to Claudia and see if she can come by to get the aliquot back tomorrow.
- Message 3 (Bottom):** From Samantha Butler (samantha.butler@mednet.ucla.edu) at 9:42 AM. To: Harout Gulessarian, sandeeprgupta. CC: sandeeprgupta. Subject: RE: URGENT Reagent Request. Samantha says they have found some already and sends an iPhone photo. She also asks if the reagent is perfect.

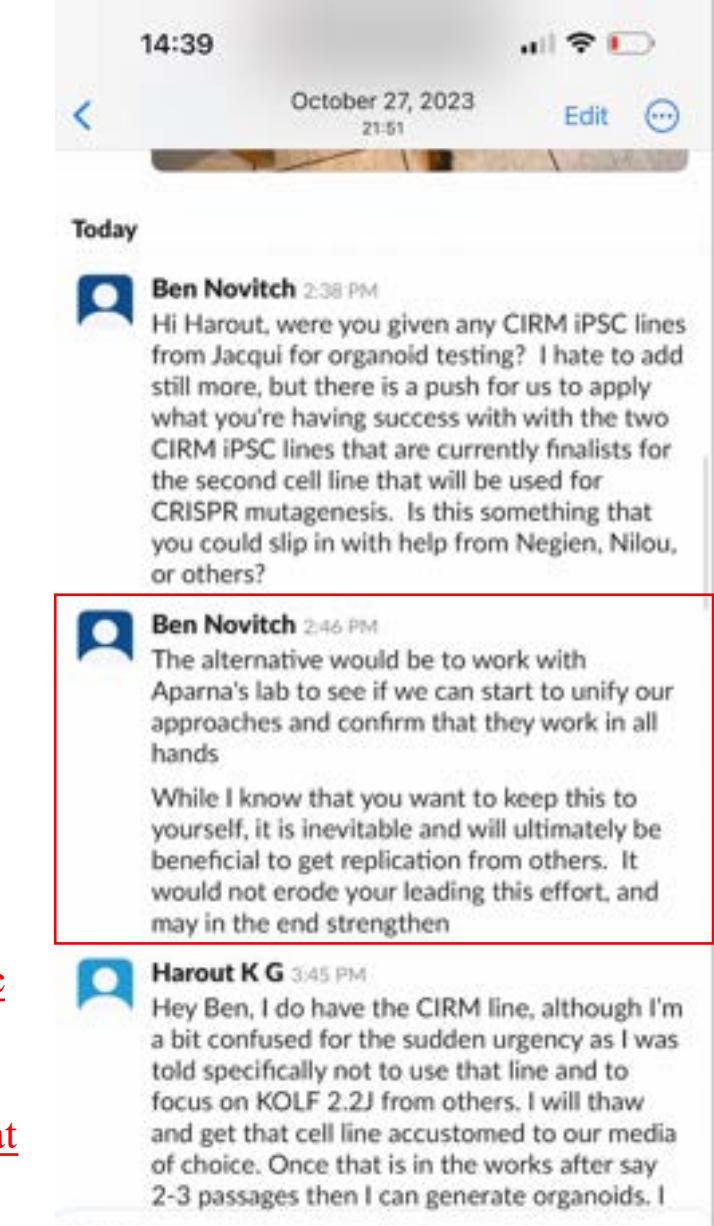
# Evidence B (prior evidence provided to UCLA)

October 2023

On October 27, 2023, I was approached by Principal Investigator Supervisor Novitch via UCLA Slack. During this communication, Dr. Novitch sought to have me waive my rights by collaborating with another UCLA lab to replicate my work, circumventing the Technology Development Group (TDG) to safeguard University intellectual property. This approach appeared to be an attempt to compel me to share my research with other labs, undermining my rights as the inventor and effectively sidelining my contributions and going against University policy.

Furthermore, the lab proposed for collaboration was part of a consortium that, as subsequent evidence will demonstrate, had intentions to allow the National Institute of Mental Health (NIMH) to profit from my discovery rather than UCLA which was openly stated in a zoom meeting held with the consortium on February 26 2024.

**Please note that I was not opposed to collaborating and sharing this discovery with the scientific community, provided that proper protective measures are taken to ensure UCLA receives its credits along with myself and to solidify its commercial viability and patentability. Supervisor Novitch has constructed a narrative that portrays me as intimidating, and obstructive, claiming that I withheld information and hindered the lab's progress to justify his failure to contact TDG. However, this situation could have been avoided if proper measures had been taken to secure the information and proper protection of UCLA property, and simply by following the law.**



# Evidence B (prior evidence provided to UCLA)

October 2023

## **\*\*Slack Message from Ben to Me: October 27, 2024 (Scientific Career Assurance) and letters of recommendations bribery \*\***

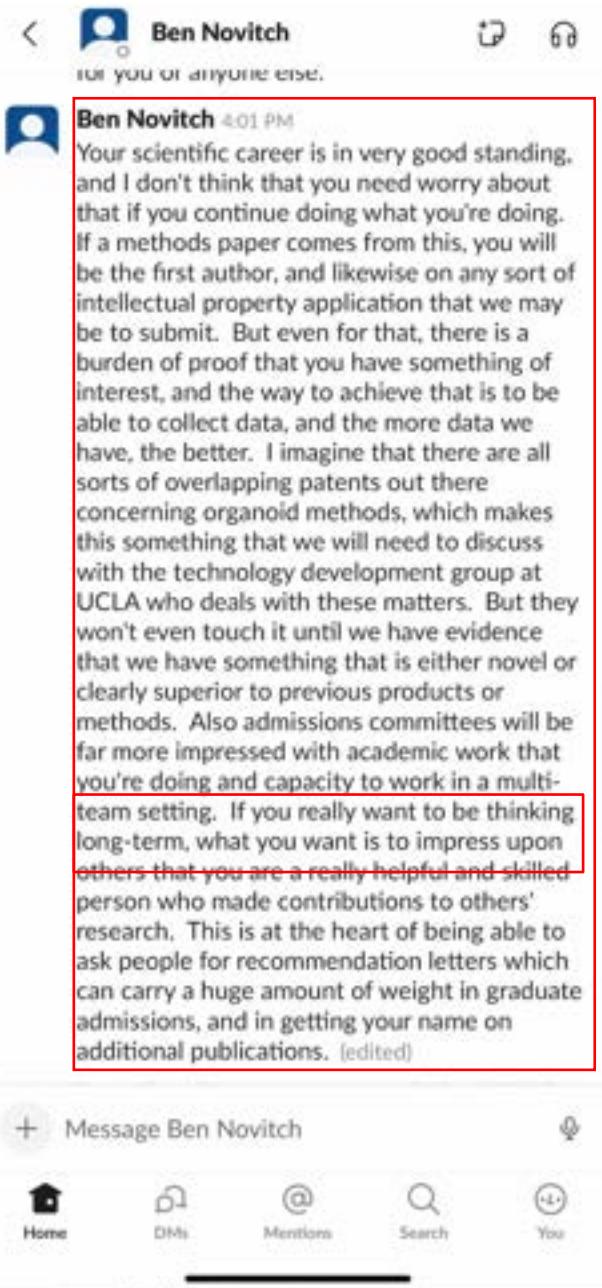
In another message, Supervisor Ben Novitch assured me:

"Your scientific career is in very good standing... But even for that, there is a burden of proof that you have something of interest..."

### ***Implications and Violations***

While this statement may seem supportive, it reflects the pressure to prove my findings while potentially compromising my intellectual property rights:

- **UCLA Faculty Code of Conduct:** The expectation that I must demonstrate the novelty of my work could lead to undue pressure to disclose proprietary information prematurely.
- **California Labor Code § 1102.5:** This law protects employees from retaliation for disclosing information related to violations of state or federal laws, underscoring the need for a safe environment for reporting such concerns.



# **Evidence A (New evidence provided to UCLA)**

October 2023

## **\*\*October 27, 2023: Attempt to Waive Inventor Rights and Concerns of Misconduct\*\***

On October 27, 2023, Supervisor Bennett Novitch attempted to have me waive my inventor rights by proposing a new protocol to generate NMPs, related to work in Supervisor Novitch's spouse Supervisor Samantha Butler's lab. This raises significant concerns and suggests potential misconduct regarding my discovery. Supervisor Novitch and Supervisor Butler planned to co-mentor a student sent to work with me, aiming to observe my work with the small molecule and replicate it using the new human NMP protocol provided by Ben. This feels like a deliberate attempt to misrepresent my discovery as their own. Notably, Supervisor Novitch's spouse Supervisor Butler has repeatedly stated in lab meetings, "You have been robbed." Later that year, Supervisor Novitch's spouse Supervisor Butler secured a \$2 million grant, raising my suspicions that my discovery was misappropriated or discussed by Ben with his wife's lab, constituting a clear violation of university rules, regardless of Supervisor Novitch's spouse Supervisor Butler being Supervisor Novitch's spouse. The verbal abuse and retaliation for whistleblowing I experienced on April 24 now appears to be linked to these ongoing issues.

The screenshot shows an email inbox with two messages from Bennett Novitch. The top message is from October 27, 2023, at 10:05 AM. The subject is "Re: Neuromuscular organoid plan for Nilou". The message body is partially redacted, but it includes a link to a document titled "Nilou cell culture...n.docx". The bottom message is from Harout Gulessarian on October 27, 2023, at 11:26 PM, responding to the attachment. The subject is "Re: Neuromuscular organoid plan for Nilou". The message body starts with "Hi Ben," and continues with "I glanced over the plan that you provided for Nilou. I will go through each step in more detail and get back to you with my input by Sunday. FYI, I thawed a new vial of KOLF2.2J yesterday that needs to be passaged in 2 days I believe. Nonetheless, I was planning to have a plate of KOLF2.2J ready for Nilou to start taking care of on Monday. Looking forward to seeing how this pans out!"

# Evidence A (New evidence provided to UCLA) 2023

## **\*\*Co-Mentorship Attempt and Evidence of Misappropriation\*\***

This student was the one Ben and Samantha attempted to co-mentor while rotating in the Novitch lab. The introduction of the new protocol raises concerns, as there is probable cause, based on the evidence provided, to believe that Supervisor Novitch and Supervisor Novitch's wife Supervisor Samantha Butler were attempting to misappropriate my discovery as their own.

This also suggests a lack of prior knowledge regarding my discovery.

NILOUFAR MANSOORALAVI  
Questions  
To: HKG90@icloud.com

Inbox - iCloud November 1, 2023 at 4:36 PM

Hi Harout,

Here are my questions about the protocol:

- 1) After removing the media from cells and washing with PBS, do we only add accutase? Is it better to keep accutase at room temperature or warm it up? And is 5 mins enough time for accutase incubation?
- 2) The protocol says to spin at 300x g but doesn't say for how long. Should I spin at 1050rpm for 5 mins?
- 3) What are the cell densities that we should try and grow (total of 6 million cells)?
- 4) I'm not sure when to prepare the media, and add these to the media and also how much to add (do these reagents come in solid or solution form?):  
Rock inhibitor-> 10uM  
CHIR-> 3uM  
FGF2-> 40ng/ml
- 5) When should I have this media prepared for feeding?  
I'm trying to do day -5 to -1 in one week that leads to the weekend for feeding. Then start fixing cells on Monday. As always, I appreciate your help!

Best,  
Nilou

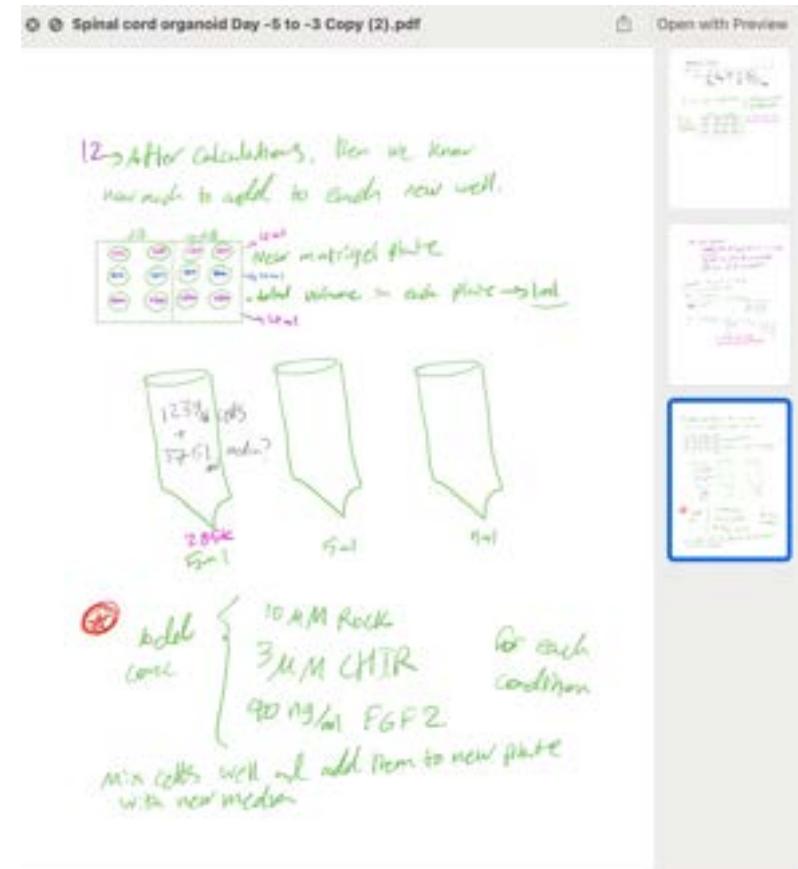
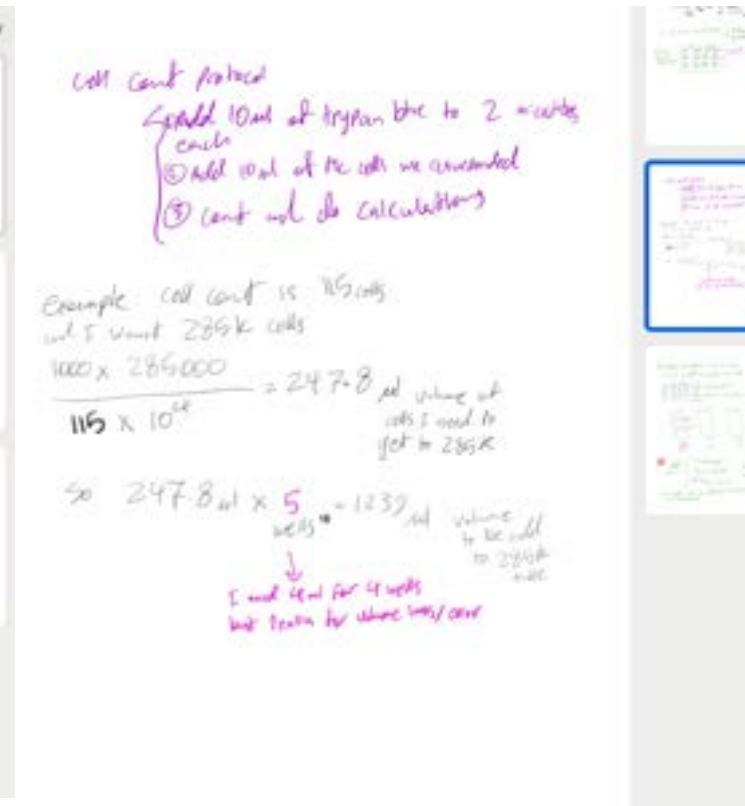
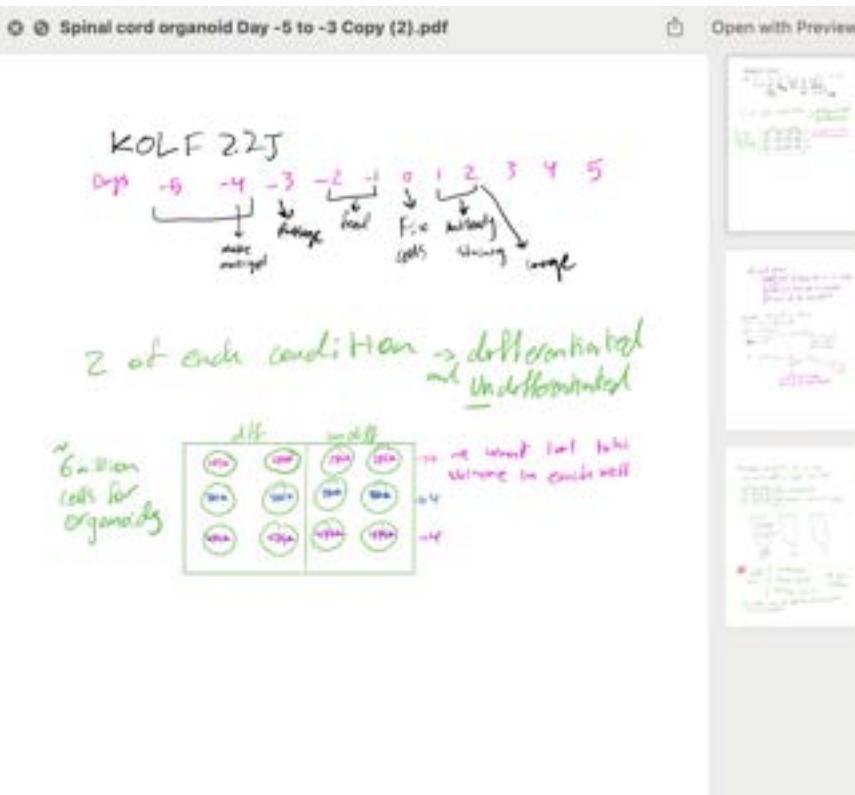
cell culture plan.pdf   Spinal cord organo...(2).pdf

## **Evidence A (New evidence provided to UCLA)**

November 2023

## **\*\*Origin of the New HNMP Protocol and Evidence of Misappropriation\*\***

The new HNMP protocol, presented by Ben Novitch, originated after my discovery. These notes sent to me by the rotation student Nilou provide strong evidence suggesting that my discovery has been misappropriated by the Butler lab. Since I did not disclose the uses of the molecule or my protocol, Supervisor Novitch and Supervisor Samantha Butler redirected their efforts to claim rights under Butler's laboratory. It is noteworthy that her lab is now working with this molecule following the receipt of a \$2 million grant, in which I suspect my molecule was disclosed..



# Evidence A (New evidence provided to UCLA)

November 2023

Continuation of the protocol that Ben sent about HNMP's after my discovery

The screenshot shows an email from BENNETT NOVITCH to HARRIET GUNDERSEN. The subject is "Re: NeuroMuscular expand plan for N100". The email body contains several paragraphs of text, some of which are highlighted in red. A red arrow points from the text in the email to the corresponding section in the cell culture plan PDFs.

This is the first page of the 'cell culture plan.pdf' document. It includes a timeline diagram, a 'Our plan' section, and a detailed 'Part 1. Generation of hPSCs, optimizing cell density for KOLP2.22 iPSC' section. Several steps in this section are circled in red and linked by a red arrow to the corresponding text in the email.

This is the second page of the 'cell culture plan.pdf' document. It continues the 'Part 1' section with steps 3 through 10. The steps are numbered and circled in red, with a red arrow pointing to the text in the email.

This is the third page of the 'cell culture plan.pdf' document. It contains a 'Timeline from the Manzini et al. paper:' diagram, a 'Our plan' section, and a 'Protocol' section. The 'Protocol' section includes a table for media volumes and a note about adding ROCK inhibitor and growth factors. A red arrow points from the text in the email to the 'Protocol' section.

# Evidence A (New evidence provided to UCLA)

November 2023

Continuation of the protocol that Ben sent about HNMP's after my discovery

The image displays three side-by-side screenshots of a cell culture plan document, each with a red border. The left screenshot shows the first page with a timeline at the top and a section titled 'Part 3: Generation of Neuromuscular organoids'. The middle screenshot shows the continuation of the protocol, including instructions for cell pellet formation and media refreshes. The right screenshot continues the protocol through Day 21, detailing the collection of organoids for fixation, cryopreservation, and ultimate RNA extraction.

**Part 3: Generation of Neuromuscular organoids**

- [Day -3 to -4] Matrexi cells using StemCell maintenance media per Human's current standard. Use the hiPSC line KAL01 2.2F. Grow to ~70% confluent.
- [Day -1] Prepare a 10 mm plate with Collagen (Coltene or Marigot should also be okay). This could be done a day in advance.
- 1 hour before dissociating cells, change media to hiPSC to NB media\* (see formula below); containing 10  $\mu$ M ROCK inhibitor.
- Dissociate hiPSC using Accutase (please see Human's protocol to re-warm at room temperature (not 37°C), remove media from cells, wash 1x with PBS (calcium and magnesium free), and add 0.5 ml Accutase per well of a 12-well plate (or 1.0 ml for a 6-well plate). Incubate for 1-10 min until cells have detached. Add 1.5 ml of NB media (no additives) per well for 12-well plate (1 ml for a 6-well plate) and pipette up and down to break up cells. Transfer to a 15 ml conical tube and spin at 300x g. Carefully remove the media leaving behind the cell pellet. Add 1-2 ml of NB media (no additives) and count cells. If cells are too dense to count, dilute with more NB media.
- For each 12 mm plate, you are going to plate cells at whichever density you determined gave the best results with respect to NMPP formation (i.e. a % of ROCK+ / ROCK- cells). The area for a 31 mm plate is ~9 cm<sup>2</sup>. The usual volume of media to use for 12 mm dishes is 2 ml.
- For example, if the optimal density was observed to be 100,000 cells/cm<sup>2</sup>, then you would want to be plating 900,000 cells per 31 mm plate. I suggest that you aim for making 3 plates if you have enough hiPSC. I will be using to confirm NMPP formation (repeating the Fc/BRCA2 staining, and the other two used to make NMPP organoids).
- Make sure that you correspond the cells to be plated in NB media with 10  $\mu$ M ROCK inhibitor, 3  $\mu$ M CTR, and 40 ng/ml FGf7.
- [Day -2] Remove media from the NMPP induction plates and replace with 2 ml of NB media with 3  $\mu$ M CTR and 40 ng/ml FGf7 (no ROCK inhibitor).
- [Day -1] Remove media from the NMPP induction plates and replace with 2 ml of NB media with 3  $\mu$ M CTR and 40 ng/ml FGf7 (no ROCK inhibitor).
- [Day 0] 1 hour before dissociating cells, remove media and replace with fresh NB media containing 10  $\mu$ M ROCK inhibitor.

Dissociate hiPSC using Accutase using 1.0 ml for 10 mm plates). Incubate for 5-10 min at 37°C until cells have detached. Add 3 ml NB media (no additives) and pipette up and down to break up cells. Transfer to a 15 ml conical tube and spin at 300x g. Carefully remove the media leaving behind the

**cell pellet.** Add 2-3 ml of NB media (no additives) and count cells. If cells are too dense to count, dilute with more NB media.

Calculate cells needed to plate 4,000, 5000, or 9000 cells per well for organoid formation. Note that you can only add up to 100  $\mu$ l volume in each well of the 6-well or 12-well plate. The cells are used to be suspended in NB media containing 30  $\mu$ M ROCK inhibitor, 10 ng/ml FGf7, 2 ng/ml CTR, and 2 ng/ml HGF. Try to make these 96-well plates, 1 for each density plated.

Centrifuge plates at 350 x g for 2 minutes to form aggregates.

- [Day 2] Reserve 50  $\mu$ l of media from all wells and add 100  $\mu$ l of fresh NB media with 2 ng/ml CTR and 2 ng/ml HGF.
- [Day 4] Remove media and refresh with 100  $\mu$ l of NB media without any additional growth factors.
- [Day 5 or 6] Collect 5 organoids for fixation and cryopreservation/immunostaining analysis. If you have enough organoids that appear healthy, collect 5 for RNA extraction by lysing them in RNeasy extraction solution (QIAGEN or similar). If the organoids look big, they could be treated as individual organoids, in which case you would put each organoid into a separate tube of RNA stabilization solution.
- [Day 6] Remove media and refresh with 100  $\mu$ l of NB media without any additional growth factors.
- [Day 8] Remove media and refresh with 100  $\mu$ l of NB media without any additional growth factors.
- [Day 10] Collect 5 organoids for IHC fixation and analysis and another 5 for RNA extraction as in step 6 above.

For the remainder, transfer organoids to 10 mm dishes with 9 ml media containing the following compositions:

- NB media with nothing added
- NB media with 0.1  $\mu$ M Retinoic acid added
- NB media with 0.1  $\mu$ M Retinoic acid and 1 $\mu$ M SAG added
- NB media with 0.1  $\mu$ M Retinoic acid and BMP4 added

You should have 10 organoids for each condition. If possible, put these organoids onto an orbital shaker set at 75 RPM and keep them shaking until the samples are collected for analysis.

- [Day 11] refresh media on the organoids.
- [Day 14] refresh media on the organoids.
- [Day 18] refresh media on the organoids.

- NB media with nothing added
- NB media with 0.1  $\mu$ M Retinoic acid added
- NB media with 0.1  $\mu$ M Retinoic acid and 1 $\mu$ M SAG added
- NB media with 0.1  $\mu$ M Retinoic acid and BMP4 added

**Projected numbers for organoid usage**

Starting with 96 organoids

- collect 3 for fixation, cryopreservation, and IHC analysis
- collect 3 for RNA extraction (for qPCR) (one for each organoid as a separate sample)
- collect 5 for fixation, cryopreservation, and IHC analysis
- collect 5 for RNA extraction (for qPCR)

There should be 76 organoids left. Split into 4 groups, 19 organoids per group.

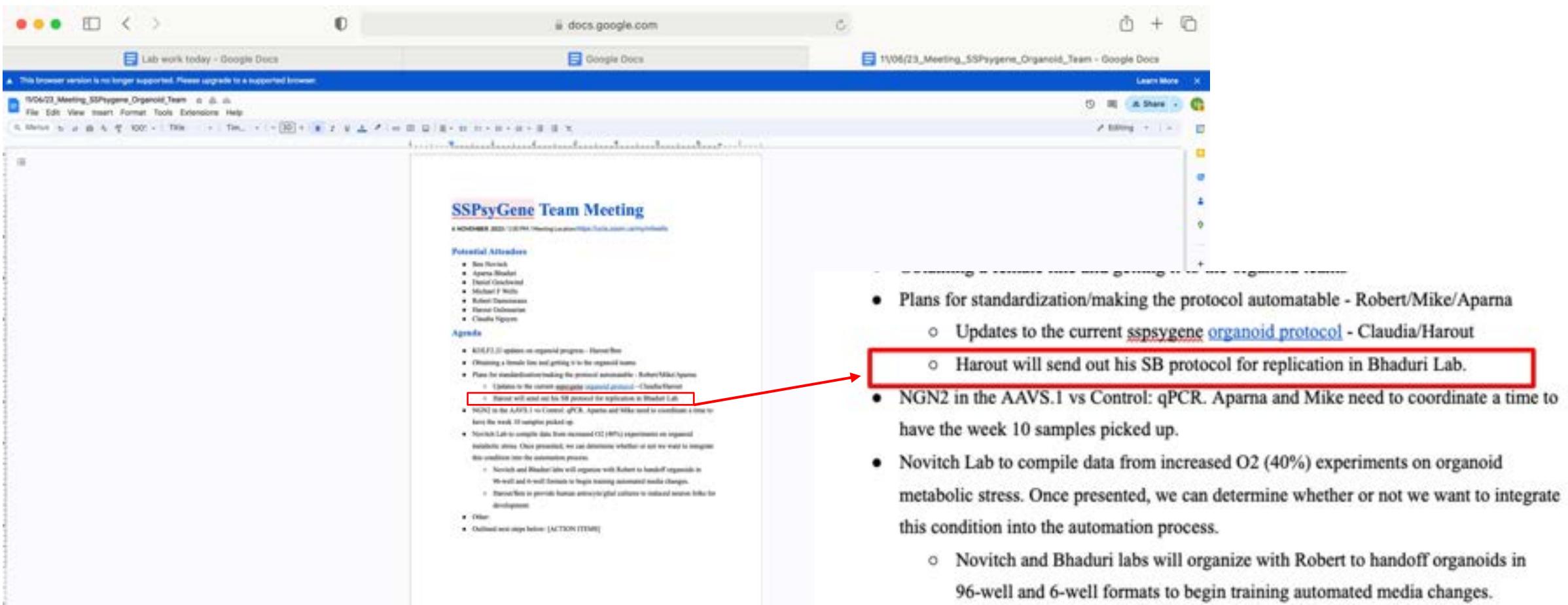
- NB media with nothing added
- NB media with 0.1  $\mu$ M Retinoic acid added
- NB media with 0.1  $\mu$ M Retinoic acid and 1 $\mu$ M SAG added
- NB media with 0.1  $\mu$ M Retinoic acid and BMP4 added

- collect 3 for fixation, cryopreservation, and IHC analysis
- collect 3 for RNA extraction (for qPCR)
- collect 3 for fixation, cryopreservation, and IHC analysis
- collect 3 for RNA extraction (for qPCR)
- collect 4 for fixation, cryopreservation, and IHC analysis
- collect 3 for RNA extraction (for qPCR)

## Evidence A (New evidence provided to UCLA)

### \*\*Pressure from the Consortium Regarding Protocol Sharing\*\*

In November 2023, I faced pressure from the Consortium to share my new protocol with them before UCLA could safeguard their intellectual property.



The screenshot shows a Google Docs document titled "11/06/23\_Meeting\_SSPhyGene\_Organoid\_Team - Google Docs". The document contains a meeting agenda for the SSPsyGene Team Meeting on November 6, 2023, at 1:00 PM. The agenda includes items such as updates on organoid progress, planning for standardization, and NGN2 experiments. A red box highlights the following agenda item:

• Harout will send out his SB protocol for replication in Bhaduri Lab.

A red arrow points from this highlighted item to the right side of the screen, where a list of actions is detailed:

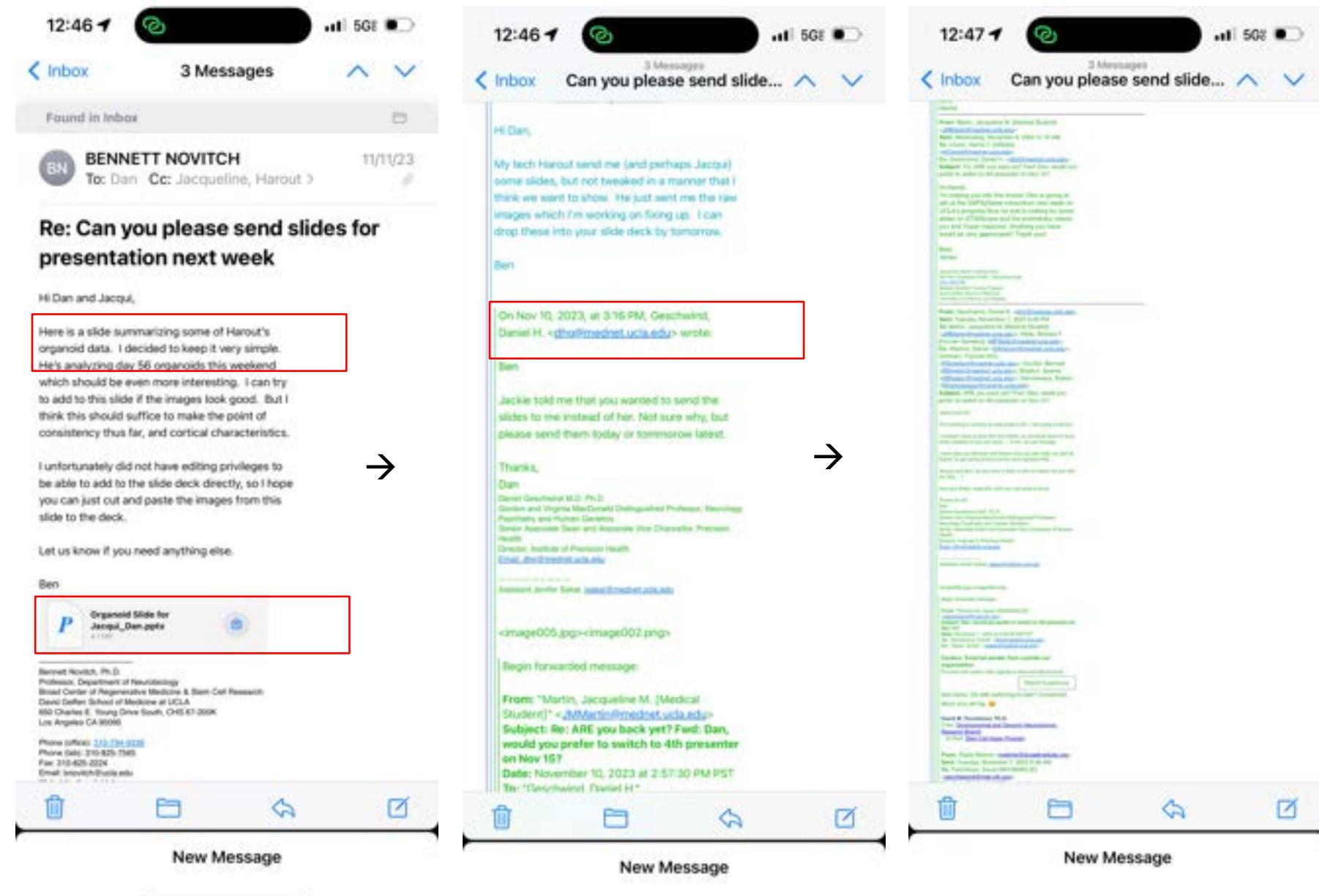
- Plans for standardization/making the protocol automatable - Robert/Mike/Aparna
  - Updates to the current [sspsygene organoid protocol](#) - Claudia/Harout
  - Harout will send out his SB protocol for replication in Bhaduri Lab.
- NGN2 in the AAVS.1 vs Control: qPCR. Aparna and Mike need to coordinate a time to have the week 10 samples picked up.
- Novitch Lab to compile data from increased O2 (40%) experiments on organoid metabolic stress. Once presented, we can determine whether or not we want to integrate this condition into the automation process.
  - Novitch and Bhaduri labs will organize with Robert to handoff organoids in 96-well and 6-well formats to begin training automated media changes.

# Evidence A (New evidence provided to UCLA)

November 2023

## **\*\*Event: Misleading Communication and Data Sharing with Consortium\*\***

On November 10, 2023, a series of emails revealed a concerning pattern of misleading communication regarding the sharing of my data with the Consortium, prior to any safeguards being implemented for UCLA-owned property.



# Evidence A (New evidence provided to UCLA)

November 2023

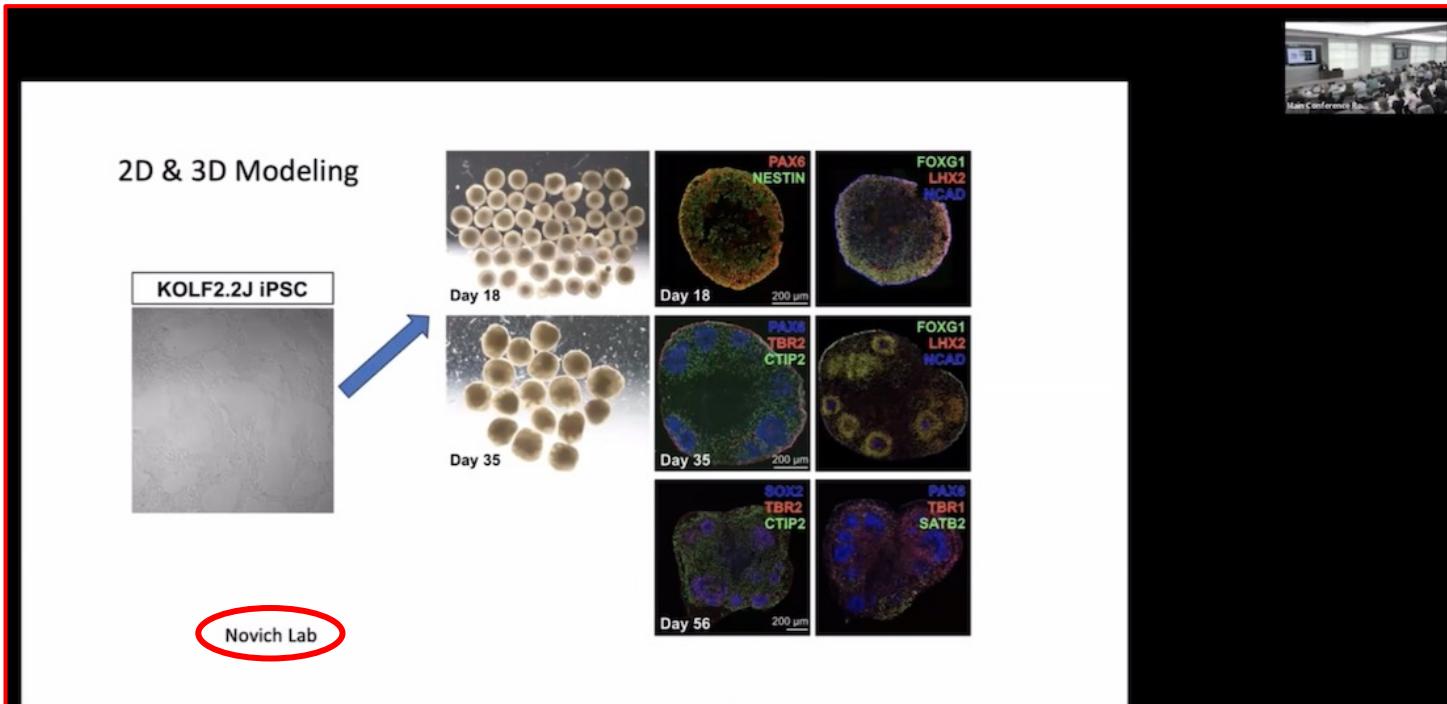


## \*\*Event: Presentation of Work by Consortium PIs\*\*

In this presentation, the Consortium PIs showcased my work conducted at UCLA, specifically representing my novel discovery and research with organoids. Although the details of the molecule were not shared with NIMH, I later faced pressure from PI Ben Novitch to waive my rights to facilitate the project's progression without letting the university know about the discovery. While my name was included in the acknowledgements at the end of the presentation, all other contributors were credited individually on their respective slides, whereas my efforts were generalized as contributions from the entire lab. This approach diluted my individual contributions and created a narrative that undermined my claims when I began to speak out against their actions. Notably, I was the only person whose name was not mentioned on the slide, while all other scientists were personally recognized for their work, illustrating a pattern of collective retaliation against me by the consortium and its members.

This group also indicated that I would be gone by the time they fraudulently obtained government grants, effectively bypassing the university's rights to its own property and undermining my employment rights, among other concerns.

[There is Video proof of this NIMH zoom meeting, see 1 hour 33 minutes into the video to see the organoid image displayed and 1 hour 34 minutes to see the Acknowledgements](#)



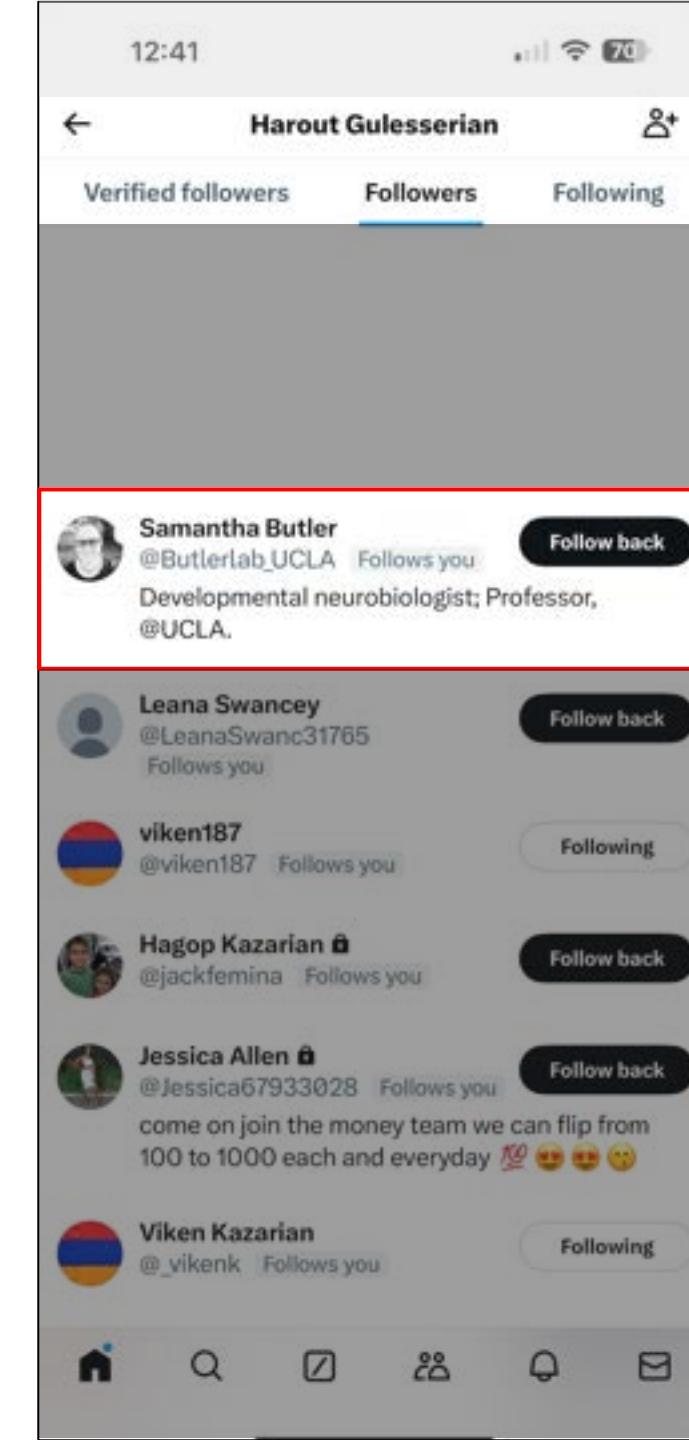
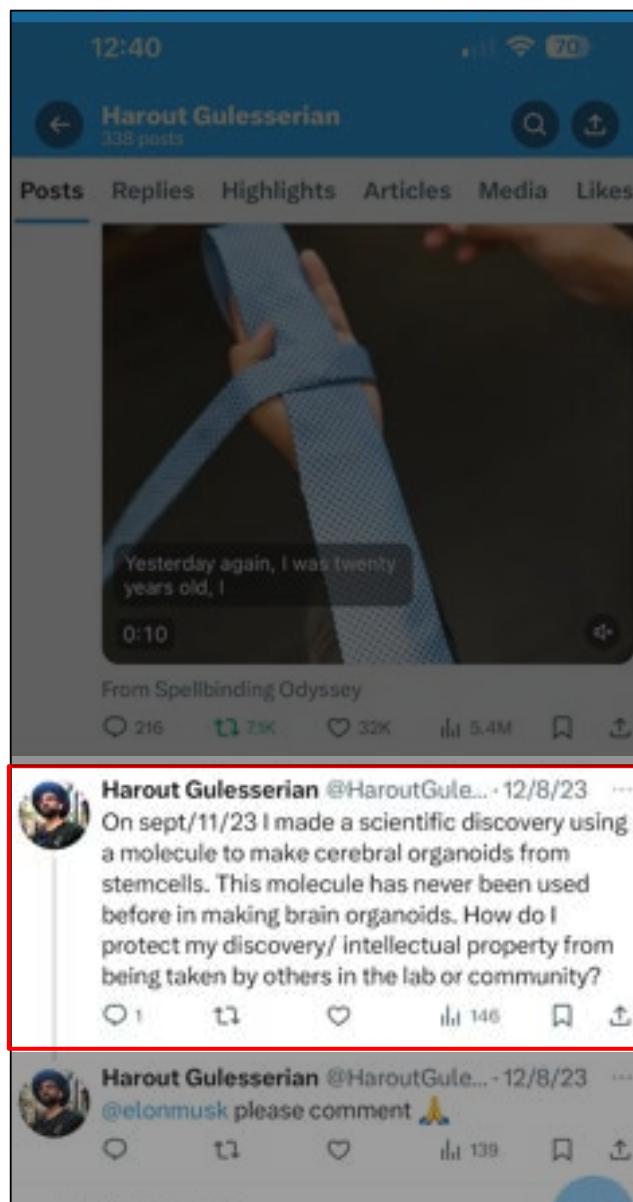
# **Evidence A (New evidence provided to UCLA)**

December 2023

## **\*\*Coordinated Efforts to Misappropriate My Work and Intimidation Tactics\*\***

From October 2023 to the present, numerous lab members have attempted to steal or misappropriate my work. For instance, Negein S documented my steps, while Cendi Ling sought to share this information with others in an effort to replicate my findings. This appears to be a coordinated attempt to sideline me from my discoveries. I was explicitly told by Supervisor Novitch and a former graduate student, "You're only a staff researcher," indicating their preference for trainees to receive grants and recognition over my contributions.

In December, I publicly expressed on X the need for help in protecting UCLA property, which prompted Supervisor Novitch's wife Supervisor Samantha Butler to follow me on X and subsequently confront me in person regarding my post, attempting to pressure me further.



## Evidence A (New evidence provided to UCLA)

December 2023



BENNETT NOVITCH  
To: Harout, Keith >

12/11/23

On December 11, 2023, Ben Novitch directly asked me to teach him how to make organoids. This is significant because it demonstrates that my protocol did not exist in the lab prior to this, and even the principal investigator is unfamiliar with the process.

### **Foxp1 KO iPSC coming tomorrow**

Hi Harout and Keith,

I had made some arrangements to obtain some iPSC lines from a colleague at UT Southwestern that I'm hoping to do some experiments with after the holidays. The package is supposed to be coming tomorrow, and if you see it, can you let me know and take the vials of cells and put into liquid N2 storage for me? There should be 3 vials of cells.

Harout, I can tell you more about these cells and my intentions tomorrow. I'm actually interested in learning how to make organoids myself in the new year, and was thinking of applying it to these cells and/or working with that rotation student that I talked to a few weeks ago.

Thanks,

Ben

# Evidence B (prior evidence provided to UCLA)

January 2024

## \*\*Contact with UCLA TDG Vice Chancellor and CIPO\*\*

On January 12, 2024, I contacted UCLA TDG Vice Chancellor Amir Naiberg, who subsequently connected me with UCLA CIPO Arora to further disclose the invention.

Found in Sent - iCloud Mailbox

**Harout Gulessarian**  
Patenting rights  
To: amir.naiberg@research.ucla.edu

January 12, 2024 at 1:50 PM

Hi Amit,  
My name is Harout Gulessarian. I work as a Staff research associate in a laboratory at UCLA.  
I recently made a breakthrough discovery (9/11/2023) and have obtained sufficient data to show the importance of my discovery.  
Can you please guide me on how to proceed with respect to applying for a patent or a pre-patent agreement, and what type of rights I have. Also can I apply on my own or do I need my PI to be present as well?  
Thank you for your time! My mednet email is [hgulessarian@mednet.ucla.edu](mailto:hgulessarian@mednet.ucla.edu). If communicating via a ucla platform is ideal please feel free to reach out to the provided email address.  
Kind regards,  
Harout

Sent from my iPhone

**Naiberg, Amir**  
RE: Patenting rights  
To: Harout Gulessarian

January 12, 2024 at 10:27 PM

Harout,  
You can find instructions on disclosing the invention in this link: <https://tdg.ucla.edu/ucla-researchers-innovators/submit-invention-form-the-best-way-to-disclose-patenting-commercial-partnering-strategy>.  
Once you complete the form, my team will be in touch with you for the next steps.

Please refrain from publishing your work before you have an opportunity to discuss it with someone from TDG.

Thank you for reaching out.

Thank you.  
Amir Naiberg  
Associate Vice Chancellor, CEO & President  
UCLA Technology Development Group  
10889 Wilshire Blvd, Suite 920  
Los Angeles, CA 90095  
Office (310) 794-6015  
Email [amir.naiberg@tdg.ucla.edu](mailto:amir.naiberg@tdg.ucla.edu)

[tdg.ucla.edu](http://tdg.ucla.edu)  
Connect with us @UCLATDG

UCLA Technology Development Group serves as a campus-wide gateway to innovation, Research and Entrepreneurship

See More from Harout Gulessarian

# Evidence B (prior evidence provided to UCLA)

January 2024

## \*\* Necessary Communication with UCLA TDG to Safeguard UCLA-Owned IP \*\*

Found in Sent - iCloud Mailbox

**HG** Harout Gulessserian  
Re: Patenting rights  
To: Naiberg, Amir

January 14, 2024 at 6:57 PM

Hello Amir,

I reached out to you last Friday regarding the instructions on disclosing my intellectual property/invention matters. You mentioned to refrain from publishing my work before going over material with someone from TDG, and I appreciate the edification on this area which is absolutely foreign to me.

Subsequently, I looked over the link you forwarded and the instructions to complete the necessary form, but I have a question as to perhaps I should fill out 3 separate forms or whether I should fill out one form as I am the inventor of all three items.

The reason underscoring my instant question as to whether to use three separate forms or just one form is the intellectual property/inventions are seemingly 3 separate items. First, is a combined mechanism and incorporation of unique molecule for something in neurology labs (and likely other lab applications as well); second, is a protocol to generate organoids; and third is a tissue tray.

So I thought before I completed the form I'd reach out for more guidance as to whether you guys prefer 3 forms or one.

As always, thanks in advance for all your time and assistance, they are deeply appreciated.

Harout

[See More from Naiberg, Amir](#)

AN Naiberg, Amir  
RE: Patenting rights  
To: Harout Gulessserian, Arora, Charanjit

January 16, 2024 at 10:30 AM

Siri found new contact info Amir Naiberg amir.naiberg@tdg.ucla.edu

**Charan, see below. Your guidance is appreciated.**

add... X

Thank you,  
Amir Naiberg  
Associate Vice Chancellor, CED & President  
UCLA Technology Development Group  
10889 Wilshire Blvd, Suite 920  
Los Angeles, CA 90095  
Office: (310) 794-0015  
Email: [amir.naiberg@tdg.ucla.edu](mailto:amir.naiberg@tdg.ucla.edu)

 [tdg.ucla.edu](http://tdg.ucla.edu)  
Connect with us @UGLATDG  


UCLA Technology Development Group serves as a campus-wide gateway to innovation, Research and Entrepreneurship

WE CALL THEM INNOVATORS

# Evidence B (prior evidence provided to UCLA)

January 2024

## \*\* Necessary Communication with UCLA TDG to Safeguard UCLA-Owned IP \*\*

1 Found in Sent - iCloud Mailbox

**HG** Harout Gulessserian

Re: Patenting rights

To: Arora, Charanjit

January 19, 2024 at 12:35 AM

Good evening, Charan,

My name is Harout. I am a Staff Research Associate over at UCLA Neurobiology.

I was chatting with Amir Naiberg regarding three invention/intellectual property items I invented/created. I noted to Amir that the whole intellectual property thing is totally foreign to me, and Amir asked that I reach out to you for guidance through the process.

Essentially, Amir indicated that once I complete the form(s), then his team will be in touch with me for the next steps. Also, Amir indicated that we refrain from publishing my work before I have an opportunity to discuss it with someone from TDG.

I am attaching all three respective forms for the three respective intellectual property items that I created/used/applied, with the intent that UCLA properly draft, prosecute, preserve and protect any and all intellectual property rights as well as my inventor credit in the instant referenced intellectual property creations/inventions.

Given this process of drafting and prosecuting intellectual property rights is entirely foreign to me, if you can have a look at the forms to see whether I am on the right track with the forms Amir mentioned, and whether I am completing the forms correctly so that the forms properly identify the inventor and inventor credit, among other things. This would be deeply appreciated on my part.

Moreover, if you can kindly give guidance as to what are the next steps to insure that the inventor and inventor credit are properly identified for the three respective intellectual property items that I created/used/applied particularly, collectively, or independently, then this would be appreciated as well.

Moreover, there are emails circulating regarding the wide spread use and further circulation and possible further public dissemination of these above matters; consequently, kindly also advise as to whether this trend should continue with the further use, circulation, possible public dissemination and application of the above newly discovered/created items, or whether we should hold up pending your teams review and guidance on the matter.

Thank you in advance for all your time and assistance on these important matters. My Attachments are incorporated by reference and remain attached and itemized as follows:

#1 Accelerated Cerebral Organoid Protocol (ACOP)  
#2 Usage of BRAF inhibitor SB590885 during ac  
#3 Cryo mold organoid aligning tray

Sincerely,

Harout

[See More from Naiberg, Amir](#)

UCLA\_Invention\_Disclo...ray.pdf    UCLA\_Associat\_ed\_Tec...OP.pdf    UCLA\_Associat\_ed\_Tec...SB.pdf

# Evidence B (prior evidence provided to UCLA)

January 2024

## \*\* Necessary Communication with UCLA TDG to Safeguard UCLA-Owned IP \*\*

The screenshot shows an email inbox interface with two main messages highlighted by red boxes.

**Message 1: Harout Gulessarian to Amir Naiberg**

**Subject:** Re: Patenting rights

**To:** Amir Naiberg

**Date:** January 21, 2024 at 7:03 PM

**Content:**

Good evening Charan,

This is an addition to my previous email.

I had a few more follow up questions regarding whether I am filling out the "creator" forms in relation to the various intellectual property interests that I created (protocol), or molecule used at a specific step in neural differentiation [Molecule SB590885], or that I co-created [the tray].

First, as you may have noticed I did not provide the materials list in the tentative earlier email. If you believe that's necessary, then I can easily incorporate that in the forms Amir requested for all three of my respective intellectual property creations.

Second, I am trying to find a form regarding the Trade Secrets aspect of intellectual property.

As I noticed you from my prior email, there are many requests for me to share my intellectual property creation(s) with non-creators, and I believe guidance on how and what portions of my trade secret information to share or not share is needed, and please provide any other relevant guidance that you believe is necessary on the trade secrets matter, as that would be appreciated.

As always, thank you in advance for all your time and assistance on these matters.

Kind regards,  
Harout

[See More from Harout Gulessarian](#)

**Message 2: Arora, Charanjit to Harout Gulessarian**

**Subject:** RE: Patenting rights

**To:** Harout Gulessarian

**Date:** January 22, 2024 at 10:55 AM

**Content:**

Hi Harout,

Thank you for reaching out and excuse the delay with my reply.

It would be helpful if we discussed over a call. Are you available at any of the following times for a 30-min call?

Jan 23 11:30-12:30pm, 1:130pm, 2-4pm  
Jan 24 12:3pm, 2-3pm

I look forward to discussing the IP with you.

Best regards,  
Charan

**Charan Arora, J.D., Ph.D.**  
Chief Intellectual Property Officer  
UCLA Technology Development Group  
10889 Wilshire Blvd, Suite 820  
Los Angeles CA 90065-7191  
Phone: (310) 794-0220  
Email: charanjit.arora@tdg.ucla.edu  
(Pronouns: He/Him)

[UCLA Technology Development Group](#)  
[tdg.ucla.edu](#)  
Connect with us @UCLATDG

# Evidence B (prior evidence provided to UCLA)

January 2024

## \*\*Continued Misguidance from PI Supervisor Novitch Amid Communication with UCLA TDG\*\*

While communicating with UCLA TDG, I have been misled and coerced by my PI/ Supervisor Bennett Novitch, who pressured me to relinquish my inventor rights to his consortium group. These attempts to have me waive my rights are linked to efforts to secure a grant through NIMH, which undermines UCLA and ,y contributions as a scientist. Throughout this process, Supervisor Novitch has even attempted to terminate my position, putting me through considerable distress for not obeying illegal orders to waive my rights.

The screenshot shows two email conversations in an inbox. The top conversation is between Harout Gulesserian and Bennett Novitch. Harout's message (highlighted with a red border) states: "Thank you for verbally memorializing to Candi and others in lab on Wednesday that only you and I will be credited with my discovery of using SB590665 for cerebral organoid formation, along with the unique cerebral organoid protocol I created. Moreover, thank you for reassuring me that the PNAseq will be initiated with timelines to be announced at our next meeting." Bennett's response (also highlighted) says: "With respect to your email regarding the talk on microglia: While I welcome the invitation on the matter, I would just like to remind you with further insight regarding a long standing matter. More specifically, while others have been incorporated into the HIV project be a new member or not, I have been marginalized, and am not sure why I am being excluded. I believe it is necessary to meet with me prior to the proposed lab meeting on Monday to further discuss the above matters, as well as matters relating to the UCLA Technology Development Group."

The bottom conversation is between Bennett Novitch and Harout Gulesserian. Bennett's message (highlighted with a red border) says: "I would be happy to talk on Monday, though it's looking like it will have to be over zoom, as I've just come down with a rebound case of covid. I'm not deathly ill, but feeling this a little more than my initial encounter over a week ago, and I expect that I may need to stay home for the next few days until it's cleared again." Harout's response (also highlighted) says: "Regarding all of the business with TDG, nothing can happen until we have some compilation of data to discuss with them. I would like this compilation to also serve as the start of figures that would eventually be presented in a publication. Certainly we can and will talk to them before any submission would be made, so that there is a chance to file an inventor report. You should be aware that the bar for UCLA supporting such efforts is higher than you might think. It talked to them about the 4G protocol, and they did not see enough novelty and applicability to merit the legal expenses that are incurred in filing and processing these things. There are also pre-existing patents on organoids and stem cell differentiation at the university level that could potentially be involved in the discussion, so we would have to take that into account. We also talked to them about the potential revenue that the university are considered the property of the university, and the investigators only get a cut. Bottom line, all of this stuff is way more complicated than it should be, and it's one of the reasons why I am frankly more enthusiastic in the positive impact that our refinements on organoids can have in our research efforts than any money that will come in from ownership of the method itself."

Bennett's final message (highlighted with a red border) says: "There may be some additional limitations due to the use of the SB drug, as the company that made or currently holds that property likely had laid out broad terms for what might be considered their property. This is where the lawyers get involved in researching the terms of pre-existing patents, etc. Where there is potential room is in identifying the mechanism by which the drug is working, which could become a place where we could screen for other compounds that work as well or are better than the SB drug. TDG gets far more excited when there is a new compound/object rather than a method, as it's much easier to document provenance of the former."

Harout's response (highlighted with a red border) says: "With respect to the HIV project, I had not realized that you felt marginalized in your participation. I did meet with Jessie yesterday to get some updates from her, and she did feel that she wanted to handle the cell culture herself as there have been too many things that have not gone right (she was hit casting any blame on you here), and given how important it is for her to finish this off, she wants to see it through. At least for the next series of experiments. But I am sure that she would welcome help with some things. We just need to talk to her about that. In my mind, we are at an "all hands on deck" place in finishing off the experiments that have been pending for longer than they should be.

Bennett's message (highlighted with a red border) says: "We do have a new rotation student, Emily Hanson, an MD-PhD student, coming in February-March for a mini-rotation (4-6 weeks I think), and she has a background and continuing interest in microglia, so I am planning on incorporating her into some of the experiments to give Jessie some help in places where she's stretched thin, but where achieving results are less crucial. I am keen on recruiting one or more students to join the lab and take up the microglia projects as still have a long way to go, and Jessie won't be here forever. I really appreciate the time that you spent working with Adrián, and I hoping that you'll be similarly helpful in welcoming Emily into the fold too. In the ideal world, we should find a way to break down and distribute all of the experiments and analysis, so that you, Jessie, and Emily are working in partnership bring things to completion. I am going to call for a group meeting with Oliver's lab in the next week or so so that we can have a catch-up and go over the assignments again."

Harout's final message (highlighted with a red border) says: "Returning to the start of my responses, I have time open on Monday from 8:30-10, and 2-3:30. We were stated to have an organoid subgroup meeting 3:30-4:30 (probably will need to be over zoom) so it would be good to talk before then, as I do want to start having conversations across the lab about implementing any improvements that you and others have found that could help one another achieve better success in organoid experiments. We all win when people's experiments are more successful. Would you be willing to present a synopsis of your efforts so that we can discuss?"

Thanks,  
Ben

# Evidence A (New evidence provided to UCLA)

January 2024

## **\*\*Inconsistencies in Supervisor Ben's Claims About UCLA TDG Engagement\*\***

In this correspondence, Ben claims that they attempted to engage with UCLA TDG in the past, asserting that TDG did not find novelty in the protocol presented. I clarified that TDG evaluates submissions on a case-by-case basis. In another email, Ben expressed a desire to learn about the TDG process, which directly contradicts his earlier statement about being denied by TDG.

It is important to note that I went through the entire TDG application process; the only missing elements were the MTA and sponsor information, which were solely held by Ben himself.

The screenshot shows an email from Harout Gulessarian to Bennett Novitch. The subject line is "Re: Request to meet". The body of the email discusses the creation of a molecule and protocol, mentioning its potential economic value and the need for TDG to clear it. It also expresses a desire for further discussion and meeting in person.

**Redacted Content:**

Redaction 1: 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 this 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].

Redaction 2: 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 UCLA's interest.

Redaction 3: 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.

Redaction 4: 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.

Redaction 5: 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.

Redaction 6: 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.

Redaction 7: Hope you feel better soon,  
Harout  
[See More from BENNETT NOVITCH](#)

# Evidence B (prior evidence provided to UCLA)

January 2024

The screenshot shows an email inbox interface with several messages listed at the top. The main message is from Bennett Novitch to Harout Gulesserian, dated January 22, 2024, at 9:57 AM. The message content is highlighted with a red box.

**BENNETT NOVITCH**  
Re: Request to meet  
To: Harout Gulesserian

January 22, 2024 at 9:57 AM

Hi Haorut,

Lots to cover, but best to wait until our conversation. I'm open to talking tomorrow evening if that is the best time for you. Jonas has a piano lesson at 7:30pm, so we could tentatively plan to talk then, if it works for you.

Would you be able to join in the organoid subgroup meeting today over zoom? If you aren't able to make it, then we probably should postpone given that I'm not at my best, and some of what you've been doing will be part of our discussion.

I hope we can address your concerns about inclusivity, as there is no reason why you cannot be participating in these different projects. I think in some cases it comes down to concerns that you aren't overloaded with juggling too many things, or saddled by people dumping work on you. I can't imagine that anyone would not want you helping!

I hope you feel better and look forward to catching up soon,

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): 310-794-8339  
Phone (lab): 310-825-7565  
Fax: 310-825-2224  
Email: [bnovitch@ucla.edu](mailto:bnovitch@ucla.edu)  
Web: <http://novitchlab.com>

See More from Harout Gulesserian

# Evidence B (prior evidence provided to UCLA)

January 2024

## \*\*Emphasis on Confidentiality Regarding Newly Disclosed Protocol\*\*

During a lab meeting, I emphasized the critical importance of confidentiality concerning the newly disclosed protocol. I highlighted that discussions about the protocol outside the lab could jeopardize our intellectual property protection and commercialization efforts, as advised by UCLA's Technology Development Group (TDG). I requested that anyone planning to share the protocol with external parties, including those within UCLA, notify both Ben and me, as well as TDG, beforehand to ensure that appropriate legal measures are taken. I concluded by expressing gratitude for the team's cooperation in safeguarding the confidentiality of our research. Note that all lab members were put on notice about the importance of safeguarding UCLA property created/discovered by me Harout Gulessarian

UCLA TDG CIPO was BCC'd in this email

Harout Gulessarian  
IP disclosure  
To: BENNETT NOVITCH,  
Cc: Negien Shalmani, ERIC HEINRICH, Sangmok Kim, Natella Balaour, Lauren Choi, Cendi Ling, Ivan Pavlovic, FU Ting,  
Jessale Butch, Erick Nedd, Maria L Caballero, Angel Emodi, diana ibrahim, BENNETT NOVITCH,  
Bcc: Charanjit Arora

January 30, 2024 at 5:00 PM Hide

Hi everyone,

Since my protocol was disclosed today for the first time @ the 2:00pm lab meeting. I wanted to reiterate some crucial information discussed during a recent meeting with UCLA's Technology Development Group.

TDG basically indicated that discussing my protocol outside of the lab may have implications for IP protection and the commercialization of my ideas. Internal discussions with lab members are considered confidential for IP purposes per UCLA's Technology Development Group.

If any of you have plans to share my protocol in any capacity with external parties, including outside of the lab but within UCLA, please notify me & TGD immediately prior to doing so, as this is mandatory per TGD to take appropriate legal steps to safeguard my intellectual property.

Your prompt attention to this matter is highly appreciated, and your cooperation in maintaining the confidentiality of my research is vital.

Thank you for your understanding.

Harout

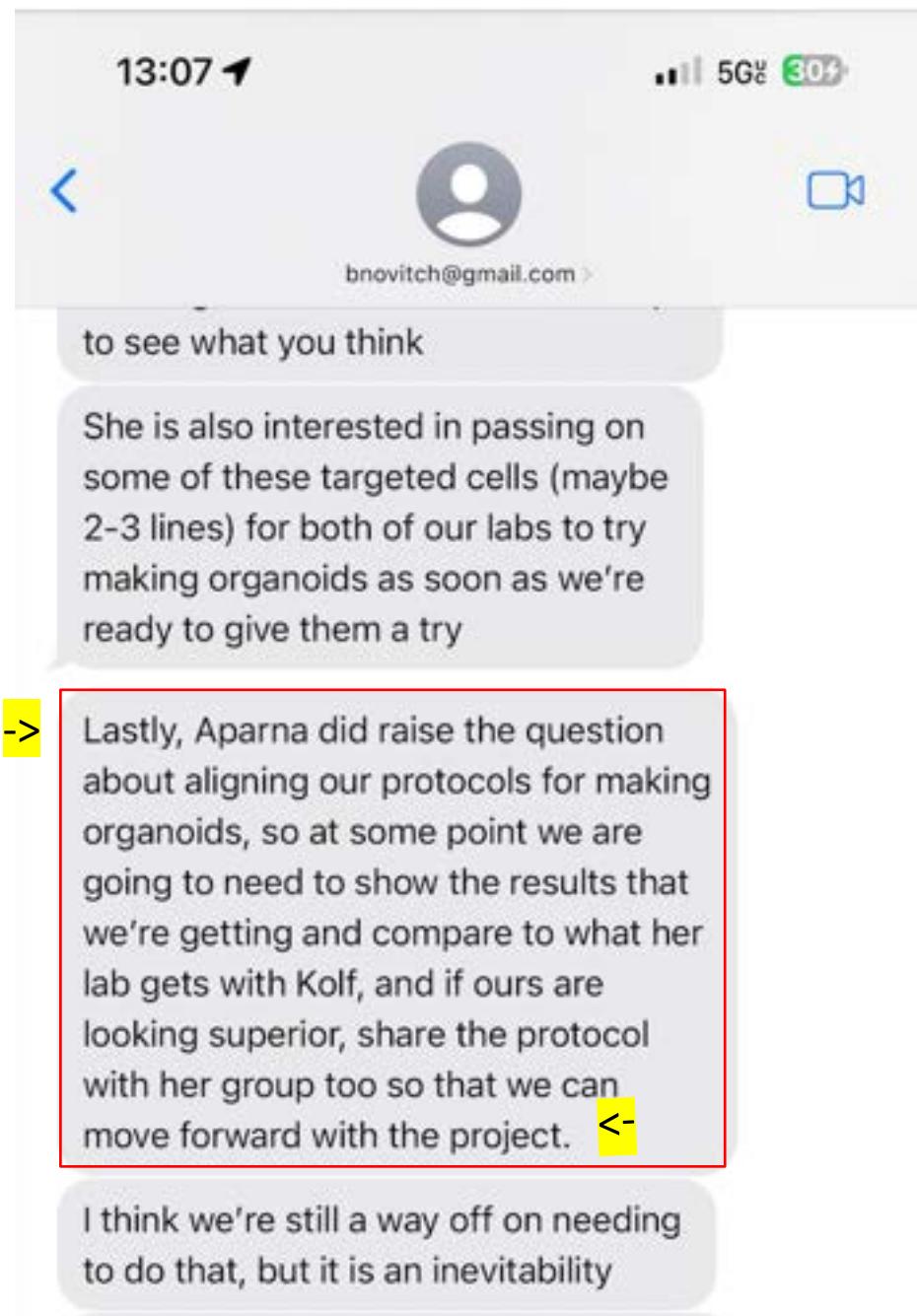
On Jan 30, 2024, at 1:35 PM, BENNETT NOVITCH <[bnovitch@ucla.edu](mailto:bnovitch@ucla.edu)> wrote:  
In the conference room.  
See you then.  
Ben  
Sent from my iPhone

## Evidence A (New evidence provided to UCLA)

February 5 2024

### **\*\*Text Message from Ben to Me: February 5, 2024 to waive my inventor creator rights again\*\***

In this message, Ben expressed his intent to push the grant/project forward, without including me in discussions or fulfilling the necessary obligations to UCLA. Had we filed the pre



# Evidence B (prior evidence provided to UCLA)

February 6 2024

## **Threatening Message via UCLA Official Slack from Supervisor Bennett Novitch's Graduate Student on February 6, 2024**

**What had been said to me multiple times before was now explicitly written on a UCLA platform, clearly indicating an intention to misappropriate university-owned assets.**

**Feb 6th**



**Natella Baliaouri** 5:58 AM

Harout

Please send out the protocol

Or else I will have to steal it somehow

# Evidence B (prior evidence provided to UCLA)

February 19 2024

 **Harout Gulessserian**  
Re: IP disclosure  
To: BENNETT NOVITCH,  
Cc: Negien Shalmani, ERIC HEINRICHIS, Sangmok Kim, Natella Ballaouri, Lauren Choi, Cendi Ling, Ivan Pavlovic, FU Ting, Jessie Buth, Erick Nedd, Maria L Caballero, Angel Emodi, diana Ibrahim, BENNETT NOVITCH

February 19, 2024 at 10:37 PM Hide

Hello Everyone,

Given the numerous inquiries regarding my protocol, I am forwarding an update below.

Pursuant to the Associate Vice Chancellor and CEO & President of UCLA Technology Development Group regarding disclosing the invention/creation: Once forms are completed on the matter, then TDG will be in touch for the next steps. Moreover, the Associate Vice Chancellor indicated that I refrain from publishing my work before I have an opportunity to discuss it with TDG. Currently, discussions remain ongoing with TDG on these very important matters.

More specifically, the Chief Intellectual Property Officer has underscored that discussing the protocol outside of the lab may hinder IP protection and commercialization of my idea.

That being said, all members who desire that I share my protocol with them, are kindly requested to engage in responding to this email, so that the Chief Intellectual Property Officer of UCLA Technology Development Group may take the appropriate steps to protect my IP, which UCLA, Ben, and myself share interests in.

Thank you in advance for your time and assistance.

Harout

[See More from Harout Gulessserian](#)

 **BENNETT NOVITCH**  
Re: IP disclosure  
To: Harout Gulessserian

February 19, 2024 at 11:49 PM

Hi Harout,

Who are you talking to at TDG? I would like to part of these conversations from here on.

I'm also not pleased with your continuing to withhold information from the laboratory as it is holding back our research efforts and counterproductive for some of the important things that we need to assess about your methods. It will strengthen any claims that we seek to make if we can provide evidence that your methods and results can be replicated by others, and that they are applicable to a wide range of iPSC lines and experimental uses (for example, good for making different types of organoids).

I believe that we are scheduled to meet at 1pm tomorrow (Tuesday)? I had thought that we were meeting with the Lin lab in the morning, but it not seems that that will be taking place at 2pm, so our time is going to be a little shorter than I was thinking we'd have, but let's spend that hour going over the data that you have so far, and map out what some figures might look like and see if we can establish some priorities for experiments to be completed or analysis to be added.

Ben

[See More from Harout Gulessserian](#)

# Evidence B (prior evidence provided to UCLA)

February 20 2024

■ Found in Inbox - iCloud Mailbox

**NB** NATELLA VAHKTANGOVNA BALIAOURI

Re: IP disclosure

To: Harout Gulessserian, BENNETT NOVITCH

February 20, 2024 at 10:17 AM

---

Hello Harout and Ben,

I am interested in testing the protocol on my lines as it would help speed up organoid production. Thank you for all your help in lab!

Best,

Natella Baliaouri

[See More from Harout Gulessserian](#)

--

Natella Baliaouri  
NSIDP Graduate Student  
UCLA

■ Found in Inbox - iCloud Mailbox

**CL** CENDI LING

Re: IP disclosure

To: Harout Gulessserian, Cc: BENNETT NOVITCH

February 21, 2024 at 12:06 PM

[Details](#)

---

Hi Harout,

I would like to express my interest in gaining access to your protocol, and I believe it could greatly benefit our work.  
Please let me know if anything is required from my end to proceed. Thank you!

Best,  
Cendi

[See More from Harout Gulessserian](#)

# Evidence B (prior evidence provided to UCLA)

February 2024



Harout Gulessarian

Re: IP disclosure

To: BENNETT NOVITCH

February 20, 2024 at 4:20 AM



Hello Ben,

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.

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, 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.

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.

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.

I don't believe my efforts to protect UCLA's 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.

Looking forward to our meeting.

Harout

[See More from BENNETT NOVITCH](#)

# Evidence B (prior evidence provided to UCLA)

February 23 2024

From: BENNETT NOVITCH <bnovitch@g.ucla.edu>  
Date: Fri, Feb 23, 2024 at 11:56 PM  
Subject: Following up  
To: Harout Gulessarian <harout.gulessarian.607@my.csun.edu>

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

During an in-person meeting on February 23, 2024, Supervisor Novitch revealed his intention to share my research with friends in Wisconsin before obtaining protection from the Technology Development Group (TDG). During this same meeting, I faced yelling, cursing, and threats of termination when Supervisor Novitch discovered I had disclosed my novel discovery and protocol to UCLA TDG. Additionally, I informed him about his graduate student's intentions to misappropriate my work, as indicated in the earlier UCLA Slack message. I firmly maintain that I have upheld university policy to the highest standard, despite pressure to relinquish my rights as an inventor so that the principal investigators can secure grants and personal gains without giving me any credit for my novel discovery.

I submit that Supervisor Novitch and Supervisor Butler began retaliating against me for refusing to comply with Novitch's request to bend the rules for their own benefit. If my termination had succeeded, they would have gained all rights and access to my protocol, along with full financial gain and scientific recognition. My belief is rooted in the retaliatory behavior I faced, which included discriminatory language and biases concerning my race, ethnicity, physical attributes, and speech. This behavior was shared among lab members to isolate me and promote a misleading narrative mentioned in Supervisor Novitch's earlier emails.

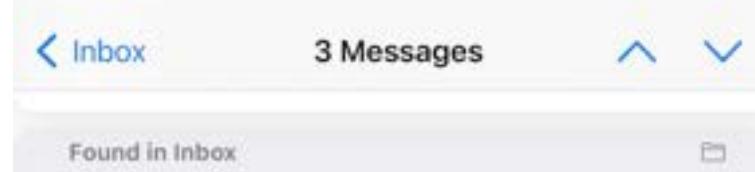
# Evidence B (prior evidence provided to UCLA)

February 26 2024

In a UCLA Zoom meeting on February 26, 2024, the Consortium principal investigators explicitly expressed their preference for the NIMH to profit from my novel work instead of UCLA, demonstrating a clear intent to misappropriate university property through a grant. I felt pressured to share my accidental discovery with individuals who had not contributed to it, putting my role in the research at risk. It is disheartening to consider that, without my documentary evidence, a Staff Research Associate's claims might not hold weight against those of 7-8 principal investigators. During that meeting, these PIs reassured that they had each other's backs, a sentiment clearly directed at me. One PI even stated that his lab had invested over a million dollars in the project, trying to convince me to waive my rights and responsibilities to UCLA, which felt like a clear attempt at intimidation and bullying.

Additionally, a consortium member suggested during an in-person encounter after the meeting that I wouldn't be around when funding is received in three years. Since my whistleblower disclosures to UCOP/UCLA, I have been marginalized within this project and all other projects in the lab. Supervisor Bennett Novitch has demoted me.

**I urge UCLA to review the recordings of previous Zoom meetings, particularly this session, as it contains statements prioritizing “NIMH” over “UCLA” concerning economic gain for IP owned by UCLA. This violates the Bayh-Dole Act, and I am not going to partake in illegal acts.**



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 Gulessarian >  
February 26, 2024 at 16:49

**Re: SSPSyGene Meeting Agenda  
2/26/24**

- Great meeting Everyone,  
Here are the minutes from today's meeting:
- PPMS is now a service available from the HSCGEC. Please reach out to James Kim or Kitai should you have any questions about purchasing items through them. Here is the link to the website: <https://ppms.us/ucappms/> HSCGEC
  - Cendi in Ben's lab performed an initial dissociation of organoids and plated neurons. The initial images look great at 40k cells per well. These cells will undergo calcium imaging with Yan in the next 10 days and another batch of replicates from ~110d will be performed in parallel. Great work Cendi!
  - Yan expressed concerns about NBM and its role in Astrocyte cell death. Yan and Harout plan to troubleshoot this issue
  - Interneurons will also need to be tested for

# Evidence A (New evidence provided to UCLA)

February 27 2024

## **\*\*ACOP DRAFT MANUSCRIPT #3 & APPLICATION THAT I, HAROUT GULESSERIAN, SENT TO UCLA TDG\*\***

## **Evidence A (New evidence provided to UCLA)**

**\*\*ACOP DRAFT MANUSCRIPT #3 & APPLICATION THAT I, HAROUT GULESSERIAN, SENT TO UCLA TDG\*\***

- (b) The innovative models promote the health academic and industrial use, particularly those supporting the needs of medical entrepreneurs/innovators and the creation of 10 biotech-like engaged institutions as well as a dozen medical participants, a positive intellectual property income stream, as well as the ability to support the operation, tool and equipment to evaluate the risks and opportunities for the self-sustaining and sustainable future, the growth model and medical innovation in the medical dimension, medical supply.
- (c) The mission has medical training and medical research individuals played the mission breakthroughs and medical researches. 14.1. Accounting theory and economic model develops and medical participation within the model. Further, empirical studies.
- (d) When making medical organizations, the organized value underlying the mission model includes (1) medical institution, as a key component during medical education and research (2) medical facility places in resolving the common challenges of medical education and administration of medical organization and (3) medical organization, related to capacity, infrastructure, during medical education and medical research.
- (e) All 14.1P innovations have a sensible application in medicine, composed by existing potential, while the medical institution can be the source of innovation. All are evidence in preparing these medical resources and (f) sufficiently meet between areas producing and working, all the while ensuring qualitatively high-quality components access and high 14.1P base.

**Abstracts/Descriptores**

**Thematics & Abstracts**

**Monographs for Rev. J. in Child & Family Studies**

[1] with Dr. Edith Eichen-Mark and others, *Relationships, Violence, Trauma (Volume 1)* (pp. 1-200) (2011).  
Authorship: Walter de Gruyter (Deutschland), ISBN 978-3-11-023211-1.  
[2] *Child Abuse and Neglect: Theory and Treatment of the Traumatized Child*. (pp. 1-200) (2011).  
Authorship: Dr. Edith Eichen-Mark, Dr. Edith Eichen-Mark, Dr. Edith Eichen-Mark.  
Copyright © 2011. Walter de Gruyter Ltd., Berlin-London, 2011.  
ISSN: 1062-1024 (print); 1522-218X (electronic).  
DOI: 10.1007/978-3-11-023211-1.  
All rights reserved. Printed in Germany.  
ISBN 978-3-11-023211-1.  
[3] *Child Abuse and Neglect: Theory and Treatment of the Traumatized Child*. (pp. 1-200) (2011).  
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[4] *Child Abuse and Neglect: Theory and Treatment of the Traumatized Child*. (pp. 1-200) (2011).  
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ISBN 978-3-11-023211-1.

**Monographs for Rev. J. in Child & Family Studies**

[1] *CRIMINA (Law, Technology, 1750-1950)*. (pp. 1-200) (2011).  
Authorship: Dr. Barbara Lutz, Technikgeschichte, 1750-1950.  
[2] *Family Violence (Volume 1)*. (pp. 1-200) (2011).  
Authorship: Dr. Barbara Lutz, Dr. Barbara Lutz, Dr. Barbara Lutz.  
[3] *Family Violence (Volume 2)*. (pp. 1-200) (2011).  
Authorship: Dr. Barbara Lutz, Dr. Barbara Lutz, Dr. Barbara Lutz.  
[4] *Family Violence (Volume 3)*. (pp. 1-200) (2011).  
Authorship: Dr. Barbara Lutz, Dr. Barbara Lutz, Dr. Barbara Lutz.  
[5] *Family Violence (Volume 4)*. (pp. 1-200) (2011).  
Authorship: Dr. Barbara Lutz, Dr. Barbara Lutz, Dr. Barbara Lutz.

Preparation for Stem Cell Transplant	
1. Hematopoietic Stem Cell Transplant (HSCT) is a procedure to treat blood cancers such as Leukemia, Lymphoma, and Myeloma.	2. HSCT can also be used to treat other diseases such as Sickle Cell Anemia, Thalassemia, and Bone Marrow Failure.
3. The process involves removing stem cells from the patient's bone marrow or peripheral blood, freezing them, and then transplanting them back into the patient after they have received high-dose chemotherapy or radiation therapy.	4. The goal of HSCT is to replace the patient's diseased bone marrow with healthy stem cells that will produce normal blood cells.
5. Before starting the transplant, the patient undergoes a conditioning regimen consisting of high-dose chemotherapy and/or radiation therapy to destroy the patient's own bone marrow.	6. After the conditioning regimen, the patient receives the transplanted stem cells, which begin to engraft and produce new blood cells.
7. The entire process from diagnosis to transplant can take several months.	8. The success rate of HSCT depends on many factors, including the type of cancer, the age of the patient, and the quality of the donor stem cells.
<b>Procedure for Stem Cell Transplant:</b> Stem Cells > Enrich > Isolate	
<b>Before Preparing stem cells, follow these steps:</b>	
<ol style="list-style-type: none"> <li>1. Collect at least 2x of a 12-milliliter per cell line with MSC qualified Mesengal cell</li> <li>2. Incubate at 37°C for 45 minutes.</li> <li>3. Aspirate Mefitter.</li> <li>4. Add 1 ml. of Ficoll® media with 100x RevivalCell per milliliter.</li> <li>5. Place back into 37°C and ready for centrifuging.</li> </ol>	
<b>End of Preparation for Stem Cell Transplant:</b>	
Stem cell harvest frozen 30L, 1 Liter	

• We can't measure the effect of a treatment on a single variable, but we can do this by looking at changes in other variables.

- 1. Make a scatter plot of  $\text{Males}$  vs  $\text{Females}$  ( $\text{Males} = \text{Males}$ ,  $\text{Females} = \text{Females}$ )
- 2. Add  $\text{Total}$  - females per cell
- 3. Add  $\text{Total}$  - males per cell
- 4. Add  $\text{Total}$  - total number of cells
- 5. Add  $\text{Total}$  - males + females per cell
- 6. Add  $\text{Total}$  - males + females per cell + total
- 7. Add  $\text{Total}$  - males + females + total per cell
- 8. Add  $\text{Total}$  - males + females + total per cell + total

• We can't measure the effect of a treatment on a single variable, but we can do this by looking at changes in other variables.

- 1. **Scatter Plot:**  $\text{Males}$  vs  $\text{Females}$  (make sure the X-axis is males and the Y-axis is females)
- 2. **Scatter Plot:**  $\text{Males}$  vs  $\text{Total}$  (make sure the X-axis is males and the Y-axis is total)
- 3. **Scatter Plot:**  $\text{Females}$  vs  $\text{Total}$  (make sure the X-axis is females and the Y-axis is total)
- 4. **Scatter Plot:**  $\text{Total}$  vs  $\text{Total}$  (make sure the X-axis is total and the Y-axis is total)
- 5. **Scatter Plot:**  $\text{Males}$  vs  $\text{Males} + \text{Females}$  (make sure the X-axis is males and the Y-axis is total)
- 6. **Scatter Plot:**  $\text{Females}$  vs  $\text{Males} + \text{Females}$  (make sure the X-axis is females and the Y-axis is total)
- 7. **Scatter Plot:**  $\text{Males} + \text{Females}$  vs  $\text{Males} + \text{Females} + \text{Total}$  (make sure the X-axis is total and the Y-axis is total)
- 8. **Scatter Plot:**  $\text{Males} + \text{Females} + \text{Total}$  vs  $\text{Males} + \text{Females} + \text{Total}$  (make sure the X-axis is total and the Y-axis is total)

The diagram illustrates the evolution of the cerebral organoid protocol. At the top, 'Organoids for Research' is shown with a downward arrow leading to 'ACOP Organoid Protocol'. This protocol is depicted as a horizontal timeline with four stages: 'Stage 1: Cell Culture', 'Stage 2: Organoid Formation', 'Stage 3: Organoid Expansion', and 'Stage 4: Organoid Maturation'. Each stage is represented by a blue circle containing a specific step. Below this, another downward arrow leads to 'Accelerated Cerebral Organoid Protocol'. This accelerated protocol is also a horizontal timeline with four stages: 'Stage 1: Cell Culture', 'Stage 2: Organoid Formation', 'Stage 3: Organoid Expansion', and 'Stage 4: Organoid Maturation'. The steps in the accelerated protocol are identical to those in the ACOP protocol but are represented by smaller, greyish-blue circles.

**Rating scale 2:** *1 = not useful; 2 = moderately useful; 3 = useful*

1. What is the evidence? 1 = **not** very strong  
2 = **moderately** strong  
3 = **strong**
2. Evidence is **useful** if it:
  - 1. Evidence is **useful** for clinical decision-making
  - 2. Evidence is **useful** for understanding what happens in a clinical setting
  - 3. Evidence is **useful** for understanding what happens in different settings
  - 4. Evidence is **useful** for understanding what happens in different patient groups
  - 5. Evidence is **useful** for understanding what happens in different circumstances
  - 6. Evidence is **useful** for research
  - 7. Evidence is **useful** for teaching

**11. Evidence-Based - safety as a time/resource, and **disability-free** partly using a **cost-effectiveness** approach**

12. Step 10: **Identify** clinical consequences from each trial or in three **studies** (see table below). **Identify** the **most important** clinical consequences and **any** other important clinical consequences.
13. **Qualify** the **importance** of the **consequences** by **Wise**. **Assess** the **size** of the **Wise** difference **from** **no treatment** ( $\geq$  **CONFIRMED**)
14. **Threshold** ( $\geq$  **TC**) with **DISAGREE** **first**

**15. **Cost-effectiveness** (see 1, 2, 3, 4)**

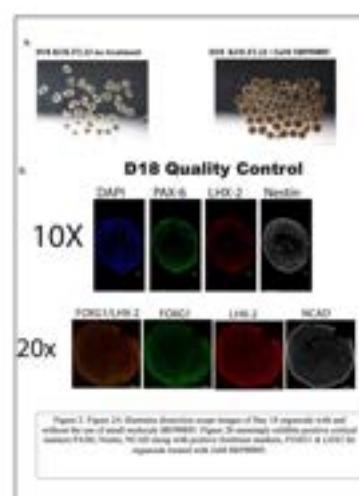
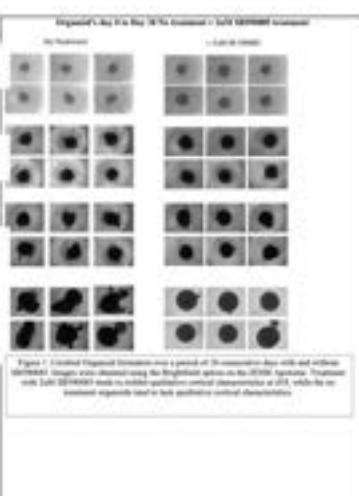
15. Step 10 and **Wise** results ( $\geq$  **CONFIRMED**) + **cost** analysis **without** considering any **more**
16. Step 10 **cost** analysis ( $\geq$  **CONFIRMED**) and **Wise** ( $\geq$  **CONFIRMED**)
17. Step 10 **Wise** results ( $\geq$  **CONFIRMED**) and **cost** analysis ( $\geq$  **CONFIRMED**)
18. **Qualify** the **importance** of the **consequences** and **any** other important clinical consequences to **step 10** ( $\geq$  **CONFIRMED**)
19. **Assess** the **size** of the **Wise** difference **from** **no treatment** ( $\geq$  **CONFIRMED**)
20. **Threshold** ( $\geq$  **TC**) without **DISAGREE** **first** (including  $\geq$  **TC** and **Wise**, **Wise**-plus-gain and **cost** **opportunity** consequences each place)

**Please respond on this **1** page. **TC** = **10**, **TC** **10**, **TC** **10**, **TC** **10**, **TC** **10**, **TC** **10** (cost **opportunity** for **no** **agreement** and **disagreement** in **each** **place**)**

**Step 10 = **TC** = **10** (cost **opportunity** for **no** **agreement** and **disagreement** in **each** **place**)**

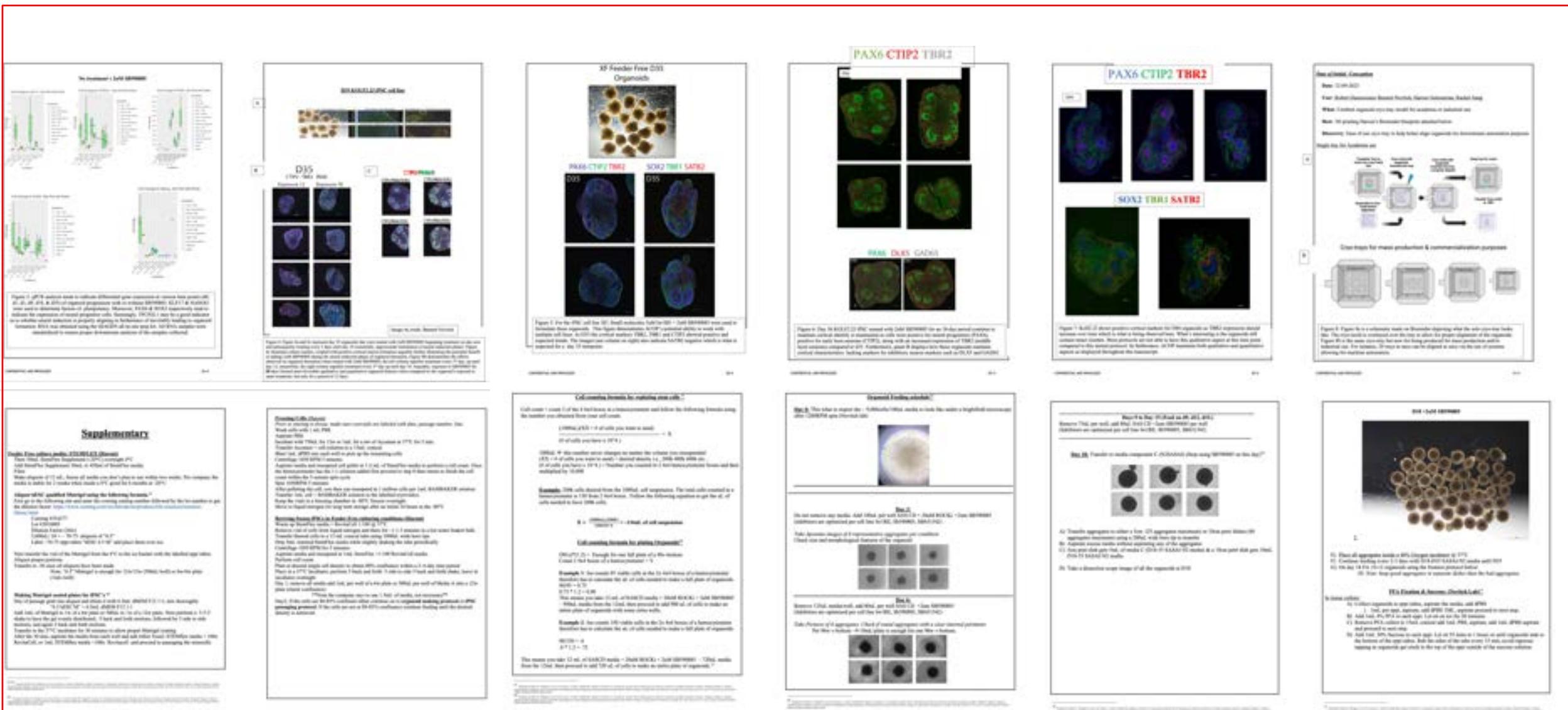
**Step 10 = **TC** = **10** (cost **opportunity** for **no** **agreement** and **disagreement** in **each** **place**)**

**Step 10 = **TC** = **10** (cost **opportunity** for **no** **agreement** and **disagreement** in **each** **place**)**



# Evidence A (New evidence provided to UCLA)

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## \*\*ACOP DRAFT MANUSCRIPT #3 & APPLICATION THAT I, HAROUT GULESSERIAN, SENT TO UCLA TDG\*\*

### Floating organoids into the Crysomold & aliquoting into a Cryotube

- A) Pre-cut a p200 wide bore tips to allow organoids to be picked up by case.
- B) Place the Crysomold onto the Crysotubes and place them into a -80°C freezer.
- C) Add OCT on top of organoids to continue washing off the excess.
- D) With a fresh pre-cut & pre-wet the p200 wide bore tips to be able to pick up the organoids and place them in the cryo mold containing OCT.
- E) Place cryomold over cryo-tips
- F) Align the organoids
- G) Place on dry ice until tissue freezing
- H) Either transfer to cryostorage or begin networking or place in -80°C.  
Note: if stored in the -80°C, you must wait 20 min or so when transferred in a cryostat to allow storage to acclimatize to the machine's temperature.

### Making 8.5% methylcellulose solution (Dextran Lab)

- A) Use funnel to measure methylcellulose 10g under TC hood (d2 = 20g).
- \*Fill powder to d500 line of 50-ccmocul tube - 10g.
- B) Put into the 250ml filter bottle.
- C) Heat 77mL DMEM/F12 with microwave until boiling  
\*20sec for 77mL, 10sec for 100mL just before the heating to avoid explosion (keep caps slightly unsecured)
- D) Filter the hot DMEM/F12 on top of the HAC powder.
- E) Agitate the mixture until the particles are thoroughly wetted and evenly dispersed.  
\*Agitate until all of powder is wet
- F) Add cold DMEM/F12 82.5ml, (d2 for 180mL)
- G) Let it cool at cold room in the shaker for 2 days.

Make 235mL of 8.5% methyl-cellulose, add 25mL to 300mL media bottle to get 8%

### References

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See References (n.d.) Retrieved from <https://www.ncbi.nlm.nih.gov>

10) Thermo Fisher Scientific. (n.d.). Retrieved from <https://www.thermofisher.com/us/en/home.html>

### INVENTION TIMELINE

Event	Date
Initial conception: Harout Gulessarian	08/11/2023
First description of the complex invention (oral or written):	10/15/2023 (Handwritten Blueprint by myself)
First successful demonstration of the invention:	10/16/2023 (Day 0)

5. Relevant Publications and Patents. Please list any relevant patent, citation & publications for draft manuscript above

# END OF DRAFT MANUSCRIPT

# Evidence B (prior evidence provided to UCLA)

March 2024

**Event:** The mention of Sandeep Gupta, a postdoc in the Butler lab, raised concerns, as it became clear that Supervisor Novitch was providing me with misinformation and pressuring me to share the protocol with individuals outside the lab. Some of these individuals explicitly indicated their intent to misappropriate my novel discovery through theft and threats directed at me like Balliaouri on the 6<sup>th</sup> of February through UCLA Slack.

**Important Event:** On one occasion prior to this email, when I asked about IP disclosure, Sandeep Gupta mentioned that I would ultimately have to give up the IP and advised me to negotiate with Supervisor Novitch for what I might receive in return for my discovery. These comments raised significant red flags, as they contradicted UCLA's established policies and records, highlighting a disparity between official procedures and the practices of certain individuals at the university. Gupta went on to state the "only PI's get a cut" which again contradicts the contracts I signed upon hire.

 BENNETT NOVITCH  
Comments on protocol  
To: Harout Gulessarian

Hi Harout,

Attached are my comments on the protocol/document that you had submitted to TDG. There are number of notes flagging points that need fixing.

  
22724\_HKG\_TG\_D\_APP\_BN.pdf

Also, looking forward, it could make sense to start formatting the protocol in a manner that gets it ready for publication one day. There are several forums including Nature Protocols and STAR protocols which are very methods-focused, and have the most details, and then research oriented journals like Nature Methods which is about methods and some key findings, but less about the details of the methods. Since our first goal is to create a comprehensive protocol that everyone can easily follow, I would like to model things based on either Nature Protocols or STAR Protocols. I'm attaching copies of some articles from each journal so that you can get a sense of how these things tend to be constructed. STAR protocols also had a sheet of information for authors which has several suggestions which are worth looking at. I am not saying that we need to have things in one of these formats to be able to distribute within our lab, but it is worth looking over what some published products look like so that we can start to adopt some of the same formatting strategies.

  
Xiang et al STAR Protocol ds.pdf

  
CellPress\_STAR Protocol te.docx

  
s41596-018-0032-7.pdf

Lastly, I am very sorry for having fed you misinformation regarding Sandeep. It was not about any recent conversations or direct exchanges that you've had with him, but rather his observations that conversations in the lab have gotten tense whenever the protocol is discussed. People do pick up on these things, and it can lead to unfortunate misconceptions. However, I think we can overcome these issues by sharing the details of the protocol as discussed, and encouraging people to give it a try and see if it works for them too. The feedback will be very helpful in refining the protocol further, and expanding the breadth of data that we may be able to draw on in putting together both a paper and invention report.

Ben

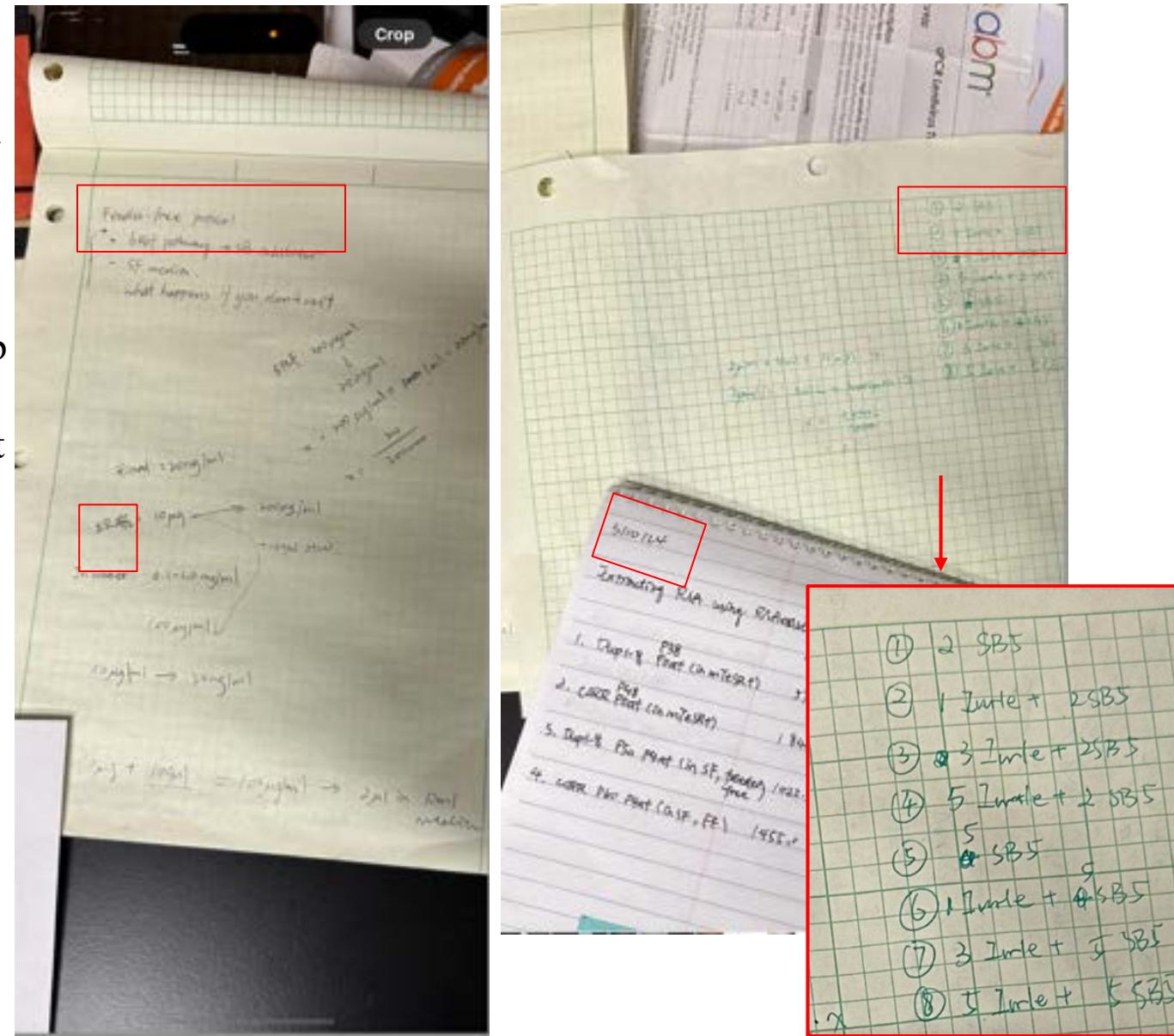
# Evidence A (New evidence provided to UCLA)

March 2024

## Further Discovery of protocol being used without proper safeguards in place

### \*\* Evidence of Intent to Misappropriate Research and Potential Data Fabrication \*\*

On March 10, 2024, I discovered a document authored by Cendi Ling that revealed her intent to misappropriate my discovery related to the Feeder Free Brain Organoid Protocol. Written in her native language, this document indicated that my protocol was being circulated among lab members, likely with Supervisor Novitch's involvement, and without my knowledge. The first document on the left shows Cendi's writing, which appears to outline efforts to recreate my discovery without my consent. The second document contains an index explaining the meanings of numbers 1-8, which may be crucial, as there is evidence suggesting data fabrication regarding the reported dates versus when the actual experiments were conducted. These findings raise significant red flags and imply potential international security concerns.



## **Evidence A (New evidence provided to UCLA)**

March 12 2024

### **\*\*Retaliation and Exclusion Following Whistleblower Disclosures\*\***

Supervisor Bennett Novitch had already passed my information to Cendi (see previous slide), and here he again attempts to pressure me into waiving my inventor and creator rights by sidelining me in favor of his graduate students, Cendi, Natella, and/or Jessie. Following my disclosures to the TDG to protect the intellectual property, he incorporated Cendi Ling into the consortium project while excluding me, all because I blew the whistle and confronted their troubling civil and criminal activities, which now seem to include potential fraud within the department.

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Show Details



**BENNETT NOVITCH**

Protocol and Dup15q organoids

To: Harout Gulessserian, Cc: Cendi Ling

March 12, 2024 at 5:08 PM

Details

Hi Harout,

How are we doing with the Dup15q organoids that you've been trying to make with your protocol? We need to turn the heat up in getting somewhere with making Dup15q organoids, and I'd really like for Cendi to be able to test out your methods on her own to expedite this process. She is also testing methods developed by Sally Temple's lab (based on Pasca methods), which I think could provide a great opportunity to examine how your approach stacks up to others' methods.

Have you made any revisions to your protocol based on the comments that I had given you? If you have, can you please share that information with Cendi? If not, I will pass on a warts and all version so as to not hold things back. Cendi will also need access to the stock of the SB590 inhibitor.

We appreciate your help with these experiments!

Ben

# Evidence A (New evidence provided to UCLA)

March 18 2024

Harout Gulessserian  
Re: Protocol and Dup15q organoids  
To: BENNETT NOVITCH

Inbox - iCloud March 18, 2024 at 3:42 AM

Hi Ben,

First, let me thank you for the valuable info regarding starting to format the protocol in a manner that gets it ready for publication some day. I believe it's a great idea and I deeply appreciate all your valuable help. In fact, I can't wait to get that part of the project underway.

Second, I just would like to clarify that there seemingly is a distinction (with an imaginable difference) as to both form and substance regarding preparing and drafting the: (1) protocol documentation for academic publication as you brilliantly proposed; versus, (2) preparing the protocol documentation as to filing merely of a non-public skeletal "pre-patent" application so as to comply with first-to-file rules with an early time-stamp and begin securing the intellectual property from intermeddling/misappropriation; and, then finally (3) as opposed to preparing the full blown rigorously scrutinized protocol documents with all the detailed data per your exact filing for drafting and prosecuting of the final "non-provisional" publicly published patent application and/or any other intellectual property interest protections that may exist under the Federal and State laws respectively.

Conceivably, in part because of UCLA best practices (I suspect these best practices are driven by the patent and intellectual property laws, whatever they may be, as I don't even purport to know anything about these laws, but TDG is extremely knowledgeable in this area and extremely helpful with wonderful guidance (see attached university links at the end of the email), it appears it is of ultimate legal importance to first quickly complete and conclude a minimum threshold skeletal filing option for the provisional/non-patent intellectual property aspect of the project so as to essentially "race" towards the United States Patent Office (hereinafter "USPTO") time stamp from USPTO in an effort to protect the IP. Then, once this pre-patent time stamp is attained, subsequently the laws seemingly give us one year of time so as to comfortably gather all of the data you feel is needed, to do more deep dive research which may include (without limits) more people, including drafting any other documentation by others as you feel is of value as UCLA/TDG presumably will use a functionally more detailed substantive documentary form for the final non-provisional patent filing, as opposed to the primary provisional filing; thus, this two-step flexibility option invariably assists in securing the IP while encouraging our research supplementation throughout the year allowing even greater degrees of know how towards the subject matter underlying the goal of an ultimate final filing via a "non-provisional patent application" and perhaps contemporaneously publishing an academic publication via one or more of the "Nature Protocols" and "Star Protocols" which you proposed underscored "Nature Methods".

This option effectively presents a win-win scenario which in part protects the IP while giving the flexibility to gather data and add additional publication value more fully.

On the flip side, if a provisional or "pre-patent" filing is NOT done, then this would likely constitute an act putting in very high risk and in extreme jeopardy: (a) my personal inventor credit, your inventor/PI credit, and UCLA's assigned interest before the USPTO respectively (evidently, this is not only a large foreseeable monetary value for UCLA and our lab, but also a perpetual academic value as to my career, our lab, and also particularly as to yourself as a world leading global PI on this subject matter because it is likely USPTO filings tend to be looked at favorably by both commercial enterprise and academia respectively).

Third, I know it's not a favorite topic of discussion, but given I remain exposed to nearly half a year of non-inclusive/discriminatory activities by lab members, sadly it is foreseeable that, if there is any malice by others towards me with intent towards precluding the filing of a pre-patent/provisional skeletal application of my discovery (or other acts thwarting TDGs ability to timely file a pre-patent/pre-release (such as potential willful infringement with anticipation to distribute an intellectual property work [such as my protocol] prepared for commercial distribution, by intentionally availing the trade secrets of my protocol to the public as opposed to only available before the USPTO until a provisional filing can be had). Therefore, whether due to sabotage or sheer neglect by ongoing non-inclusive, discriminatory and/or retaliatory co-lab members, or otherwise, it becomes obvious that we cannot 100 percent exclude a risk of unlawful intermeddling/misappropriating. Haud or other intentional malfeasance to thwart a pre-patent filing, if for no other reason, that I essentially blew-the-whistle on discrimination and overt threats of intermeddling/misappropriation of my discovery/protocol<sup>IP</sup> by co-lab member(s) to you.

Consequently, if any 3<sup>rd</sup> party intentionally or accidentally leaks my intellectual property (prior to a pre-patent skeletal barebones filing) to a nefarious 3<sup>rd</sup> party, then seemingly all proprietary discovered and learned details of the protocol and its specific intended commercial use would essentially become exposed (in 100% reproducible detail) to intermeddling third parties.

Sadly, as I told you numerous times in the past, I was put on notice (by folks even in our own lab) that individuals intend to misappropriate my discovery. Of course, subsequently after numerous verbal jabs by some folks in and about our lab, this whole madness ultimately culminated in brazen written notices to me of such intentions (which is sadly what it took for anyone to actually care about what I was saying for almost half a year).

Now, I hear you as you say all of the non-inclusiveness, discrimination, and intellectual property threats are basically just done as jokes and they are intended to be in jest. At some point perhaps I will be able to accept that this really was/is the case, but currently I cannot do so, and I understandably remain traumatized by the hostilities. The good news, however, (as I always try to be positive) is that luckily UCLA makes available a plethora of resources to help remedy exactly such types of violate matters, and despite the awkwardness I am truly trying to take affirmative efforts to get as much help to try find suitable remedies so as to be made whole again. In fact, again, I appreciate you reaching out with the ideas of helping the situation by proposing to do outside mediators. Going forward I need a little bit of time, but I am very willing to try your proposed outside mediators and I want to thank you for your offers to help. So perhaps we can also start planning or at least discussing how to ultimately get that moving as well.

Nonetheless, it remains that third parties (rightly or wrongly) will have the freedom to do as they see fit with my confidential discovery/protocol if the intellectual property is placed in the stream of public information before TDG is able to secure a provisional/non-patent time stamp from the USPTO; predictable harm includes, but isn't limited to, denying a right for a patent of my invention/discovery because of bad actors seeking to use my discovery for their own filing, and thus spurring unneeded litigation for likely issues such as misappropriation, infringement and other legal causes of action to the full extent of what the law may allow under such circumstances.

Therefore, I humbly request that our lab please be on notice and be aware that "an applicant who publicly discloses" (covertly or overtly) an invention or creation ("e.g., publishes, uses, sells, or otherwise makes available to the public") may lose the benefit of being the first to invent or create the intellectual property and may also lose the right to ever patent the invention. To the extent the law allows, I can only object to that occurring and reserve all rights, and I can say I absolutely do not want this to happen to me or my discovery, under any circumstance for obvious reasons and therefore I believe it is imperative for our lab to follow TDG guided and TDG approved best practices regarding these very important matters.

Although I know next to nothing about intellectual property protection, luckily another aspect of UCLA best practices is the Office Of The Associate Vice Chancellor & CEO/President of UCLA Technology Development Group who encourage & require me as a UCLA creator of novel intellectual property to first touch base with the Chief Intellectual Property Officer/TDG which is a tremendous resource for both information regarding the drafting and prosecution of intellectual property interests of both UCLA and the creators/inventors/PI's who discover the intellectual property.

That being said, I believe it is important to amplify some of the valuable information underscored to me from TDG respectively (including the resources made available to me regarding the legal importance to ensure that you, myself, and UCLA timely comply with the First-To-File doctrine before the United States Patent Office "USPTO"); it seemingly appears absolutely vital to understand something called "First-To-File" policy legally affects patent applications and/or other intellectual property interests in an effort to better understand why I believe it is necessary to ensure sterile, controlled, and staged dissemination of pre-time stamp confidential proprietary discovery information and limit circulation of this intellectual property until yourself, our lab, and myself are assured by TDG/UCLA IP/Patent lawyers that the intellectual property is provisionally time-stamped before USPTO and as such remains legally more shielded (seemingly, from what I understand from TDG, legal protection is essentially exposed up and until TDG can file the **not publicly disclosed** confidential pre-patent applications with USPTO). Therefore, USPTO time stamp on the project furthers the First-To-File policies of the USPTO, and without that there remains a real and serious a grave legal risk as to drafting and prosecuting the final non-provisional USPTO intellectual property filing by TDG before the USPTO.

On this topic, there seems to be some confusion as to what amount of data is required for the minimum threshold needed for the pre-patent provisional filing (not the complete and final non-provisional filing), so as to be able to achieve the filing of the first stage non-public pre-patent application with the (USPTO), as opposed to the varying degree of substance and form needed (or academically preferred) for Academic publication and the non-provisional second and final stage patent application filing. As noted more fully above, from my minimum information regarding the three separate issues, there may be overlap, but essentially all 3 do not have the same exact thresholds and it makes sense because they seemingly serve different purposes.

Regarding your brilliant ideas as to academic publication, arguably at minimum, there exists academic prestige, academic reputation, career promotions and historical scholarly value underpinning the publications and invention/discovery laboratory origins. Regarding, patent and intellectual property there is arguably capitalistic big-business and large-scale complex litigation that would seemingly drive the minimum thresholds for filing any and all relevant documents before the USPTO so as to protect an inventor/creator/ and any others who have monetary or other legal/beneficial/equitable or otherwise pecuniary interests.

That being said, I may be wrong, but I came to understand that generally, an inventor who wants to protect their invention/creation (as I certainly am requesting/determined to do so) generally needs to acquire some type of approval from the U.S. Patent and Trademark Office ("USPTO").

Basically, people are telling me that one of the main purposes behind intellectual property laws is to prevent someone else, other than the inventor and approved parties, from getting a patent or trademark or copyright or any other intellectual property interest for the same invention/creation, even though they were not the genuine inventor. Moreover, online websites make it appear that often there is a "race" to the "USPTO" office, as I believe will be the case in this instance and therefore; thus, it makes sense why TDG underscores the need to first protect and asap file a pre-patent application before the USPTO with the minimum legal threshold while maintaining strict privacy and confidentiality to ensure there is no misappropriation of the intellectual property by 3<sup>rd</sup> parties who are not inventors/creators or otherwise hold any lawful interest in such intellectual property.

# Evidence A (New evidence provided to UCLA)

March 18 2024

Continued

Given the complexity in this area of law, it most certainly makes sense we continue reaching out to TDG for guidance and remain closely under the tutelage of TDG as we further verify all steps and stages of this project with TDG and any of the intellectual property attorneys at UCLA's discretion. Also, I was edified that essentially the (patent/IP) applicant who essentially first files their patent application seemingly receives priority (with likely some minimum exceptions). This basically means, because I am the inventor/creator of the protocol and usage of SB590885 (in this case, during neural induction), and because you & UCLA have a respective interests, it became clear that UCLA, yourself, our lab, & myself would be arguably legally and irreparably harmed should my protocol make it in the hands of any nefarious or otherwise careless folks who inadvertently or inadvertently allow someone else to first file this before the USPTO or a grant proposal.

Given, the numerous past verbal threats and discrimination that we've discussed, and that I essentially lived/living through, I understand that you thought first that it was all in my head, and thank heavens, now you are instead telling me that yes it is not all in my head and its unprofessional, but that it's all just a joke and in jest, but I just want to say that things had to get so bad that these discriminatory non-inclusive threats of harm against me had to get crystallized in brazen written demands before there was any acknowledgement of just how bad things got. But with your help and guidance I hope to get past all that negative stuff and that we take our lab to the consummate sky-high apex levels of dual corporate and academic excellence.

I believe since UCLA has had misappropriation related litigation in the past (and for certainty as to my interest, if any, and no matter how minimum it may be the legal process remains objectively important), UCLA could easily pursue any and all legal rights and remedies to prevent misappropriation from occurring; this may hypothetically even include taking up foreseeable lawsuits for the civil and criminal causes of action of misappropriation, among others.

Also, I know this email is a bit on the long side, but I am sure you understand it's a very tough subject to talk about, and I am grateful to you for finally allowing me the space to open dialogue on this. Notably, I was, and to some extent still remain, the subject of a many months long non-inclusive discrimination by lab staff, and given that you appeared to be upset with me for trying to point this stuff out to you, including (not limited to) sometimes the prejudice against how I talk, how I annunciate, (even though I can't change the ethnic community my origins are from), and given that many of these same characters not only continue the hostilities and discrimination and non-inclusiveness towards me, I remain marginalized (I even seem to see the writing on the wall that I will never be allowed to partake in the HIV project, while others are treated differently and enjoy participation privileges which ultimately will lead to promotion privileges for others, but not for me). Per your recommendation, I absolutely encourage for us to begin dialogue towards achieving outside mediations and arrive towards the healing process so as to move our proverbial intellectual football towards an ultimate philosophical touchdown with USPTO and Nature Methods, as I have an interest in further understanding the mechanistic approach of small molecule SB590885 via RNAseq for the earlier timepoints and employing Single Cell sequencing for the later timepoints D56 & D64. Moreover, I plan and hope to further study SB590885 when I enter the PhD program.

Again, sorry about this longer than usual email, but these difficult to talk about problems went on for so long, to the degree they even culminated in retaliation and hostility against me especially once word got out about my discovery. All of this had to sit with me a bit before I was able to get my bearings straight and sit and write this email. Writing this email brings back being exposed to verbal assaults, insults, and notices that others will misappropriate my invention/discovery with a purported aim that I neither am able to secure a USPTO filing nor any interest therefrom, but it seems through outside mediations and other resources I anticipate an ultimate positive remedy on these issues and securing my inventor rights, if any.

As I said above, I am EXTREMELY grateful to you for everything you do for me; and I mean: EXTREMELY GRATEFUL! But, at the same time I am very sad, hurt, and otherwise full spectrum damaged that for so long you essentially didn't believe me, told me it was all in my head, and just let the non-inclusive discriminatory activities go unattended; basically, things got so bad that it took people actually telling me in writing that they will "steal" my intellectual property for you to believe me. Nonetheless, if I may be frank (as hard as this is to talk about) the reality is I am harmed, and I am trying super hard to get better. Cross our fingers, luckily UCLA has many resources for people who have precisely suffered such harms and I am making almost all efforts towards getting all the help offered from UCLA, but it's not a lightning fast, nor easy process to full healing and full recovery.

Again, I am EXTREMELY grateful to you, and I like the idea for doing outside mediations or other dispute resolution mechanisms available at UCLA to try to redress my harms and get back up to normal speed (and, at minimum, hopefully trend towards getting back up to normal speed). Thanks for offering the assistance; again, I had to sit with the ideas for a little bit because it's all so overwhelming and I don't know much about the process, as I needed to be better edified on all causes and issues, but I believe your idea is really good for a start and maybe we can work on that as well, especially as we preliminarily aim for the provisional barebones USPTO filing; thank you!

That being said, there may be real lab potential threats to the IP, in that as an inventor/creator of intellectual property, I may also be harmed; UCLA may be harmed, as UCLA may not be able to get a patent in the U.S. on the basis that I actually discovered/invented a novel product or process before anyone else did, particularly if someone directly/indirectly leaks the information before TDG can time stamp it with the USPTO, and so I submit and propose that we need to prevent further harm to me and future harm to UCLA, while we also gain the flexibility to do more testing and gather more lab data by putting together all information for TDG to file the pre-patent provisional skeletal time stamp sensitive application.

We can run this with TDG again sometime this week, but I believe a non-public provisional USPTO application is first priority and imperative so as to ensure the fastest filing with the USPTO, yet the filing can seemingly remain non-public, and it can ultimately be supplemented by a completed non-provisional application that you can rigorously scrutinize and feel super comfortable with. Furthermore, TDG states along the lines that the USPTO gives us 1 year to do this so you and I can have the needed time to overlook every little detail, yet we can more comfortably share the protocol with others after the provisional time stamp via a provisional application is completed.

It is arguably because of this, that TDG basically told me that they want to file some kind of "pre-patent application" (keep in mind I may have the lingo wrong, the idea is there and I am certain TDG will give us the exact information) which ensures quickly the "first-to-file" legal requirement, and because this "early patent application" is not made public the USPTO it seemingly gives us one year to supplement the real application with all data and other materials you desire while insuring no public limelight and protecting the First-to-File Rule which legally affects UCAs and your and my patent rights, if any.

Again, it's difficult to talk about, but the fact remains we even already have it in writing that unnamed person(s) desire to steal or misappropriate my protocol, so because of this we should leave nothing to chance. I propose we ascertain from TDG exactly what is the bare minimum to file so to preserve the First-to-File rules of the United States and then we do a more diligent subsequent supplemental work product adding to the provisional application which (I believe, as I was told this by TDG) is not made public until we are comfortable with our data and materials, and until we file the non-provisional application. Given the United States gives us one year to do this, we may be able to also release an academic publication at the same time the application goes public one year after the initial filing.

Given the Federal and State laws before California and the United States emphasize time is of the essence, I propose we do as TDG essentially says, which is to file provisionally with the minimum needed for filing so as to file without a formal claim, or declaration, or any information disclosures necessary. Then we comfortably take the next 8-10 months to make a perfect academic work product for public publication that can bring prestige to the lab and UCLA, and this way we don't have time at our back as we do not have to worry about academic optics and rigorous academic to the standards for academic publication until the time is ripe.

That being said, it is axiomatic that UCLA, you, myself, and the lab would suffer immediate irreparable harm should someone decide to retaliate and simply take my discovery and allow a prior filing to outpace our pending filing. Imagine the foreseeable yet unneeded litigation this may trigger. On that note, and because of these seemingly bright line laws and rules, I humbly request that we make any and all edits necessary and keep whatever other requirements done in complete secrecy so as to at least allow TDG to file the pre-patent filing which seemingly resolves the First-to-File problem, and yet, that precisely would also allow us a greater comfort to circulate the protocol for greater testing and broader data with more people so that the protocol can subsequently be incorporated amongst all of the new future data and testing groups.

I submit giving the protocol to the others makes sense after TDG has filed and time stamped the bare bones minimum USPTO applications, as there is no guarantee that people who told me they will steal my product will not do so. I understand you are an honorable man and I appreciate you so much, and you have just as much to lose as I do, if one of the others even accidentally discloses the discovery to the wrong person(s).

Additionally, we can ask TDG if there are legal documents such as NDAs or other documents that would import further legal liability on any others should they accidentally or intentionally disclose my invention to 3<sup>rd</sup> party bad actors prior to at least TDG securing a bare bones USPTO time stamp filing. It may be wishful thinking, but I doubt either you or anyone else can provide UCLA and myself and yourself the written legal guarantees necessary to dampen the odds of such a bad foreseeable intermeddler scenario occurring. Keep in mind these are the same folks who make horrible jokes and ensure that I remain in a non-inclusive discriminatory hostile workplace, so my trust level in these folks remains very limited.

# Evidence A (New evidence provided to UCLA)

March 18 2024 continued

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Additionally, we can ask TDG if there are legal documents such as NDAs or other documents that would import further legal liability on any others should they accidentally or intentionally disclose my invention to 3<sup>rd</sup> party bad actors prior to at least TDG securing a bare bones USPTO time stamp filing. It may be wishful thinking, but I doubt either you or anyone else can provide UCLA and myself and yourself the written legal guarantees necessary to dampen the odds of such a bad foreseeable intermeddler scenario occurring. Keep in mind these are the same folks who make horrible jokes and ensure that I remain in a non-inclusive discriminatory hostile workplace, so my trust level in these folks remains very limited.

Please forgive me for being so worried, but I have suffered actual harms, threats, non-inclusive discrimination (as I am still not allowed to participate in the HIV project for example), hostile workspaces, retaliations, and yes maybe all of these things are intended as dark jokes, but what if being a devil's advocate, just what if, there was an ounce of truth behind these supposed "jokes." The fact of the matter is I was and remain harmed and I am trying to get better but it's not easy to do both at the same time, not to mention if something went wrong my harm would be disaster level harm. If TDG can outline in writing for us what is the minimum needed for a preliminary time stamped document that we can complete within the year, then this would be the safest method to share the protocol with third parties to do deep dive research and data. The worst-case scenario is that we are not happy with the data and the filing gets revoked and never becomes public. So, there is no downside to being safe and getting the bare bones time stamp filing going, with a year for us to build around the application and not be rushed.

This would also give me the time to try to get help, do mediation or whatever else and heal from all the negative issues discussed above.

Per UCLA's TDG Chief Intellectual Property Officer there is a request that we give them a list of all the "sponsor and MTA information" because they invariably need this information for processing the invention report (this was mentioned in our previous meeting) so as to begin the time sensitive pre-patent provisional time stamp filing so this can secure the IP so we can then more freely share the IP because the pre-patent provisional filing will serve as evidence in the right direction towards satisfying the legal requirements per the USPTO First-To-File rules. We can both reach out to TDG in writing, asking TDG to guide us towards securing and potentially patenting the discovery I made in your lab. I look forward to making great things in the Lab!

Thank you in advance for all your time and assistance on the above matters: all is DEEPLY APPRECIATED!

<https://tdg.ucla.edu/ucla-researchers-innovators>

<https://tdg.ucla.edu/about/faq>

<https://tdg.ucla.edu/about/faq#disclosure-ownership>

<https://tdg.ucla.edu/industry-investors/faq/patenting>

Harout

# **Evidence A (New evidence provided to UCLA)**

March 2024

## **\*\*Threats and Conspiracy to Undermine Intellectual Property Rights\*\***

- On February 6, 2024, graduate student Natella, who is under Supervisor Novitch, informed me of their intention to steal my work. No safeguards were in place, and the protocol had somehow been leaked to Baliaouri and her colleagues. The second image, labeled “3/18/2024 AE,” confirms that they are indeed working on Feeder Free organoids without my consent; this photo was taken in March 2024.
- Later in April, I was unfairly blamed for their mistakes in the lab by Supervisor Ben Novitch. Additionally, the individual who threatened to steal my discovery conspired with Supervisor Novitch to undermine my rights and to share my work with the group and consortium.
- The next slide illustrates how Supervisor Novitch conspired with the individual who intended to "steal" UCLA property. They are actively advocating for their grant instead of fulfilling their obligations to UCLA by properly disclosing what is rightfully owned by the university.

Feb 6th



**Natella Baliaouri** 5:58 AM

Harout

Please send out the protocol

Or else I will have to steal it somehow



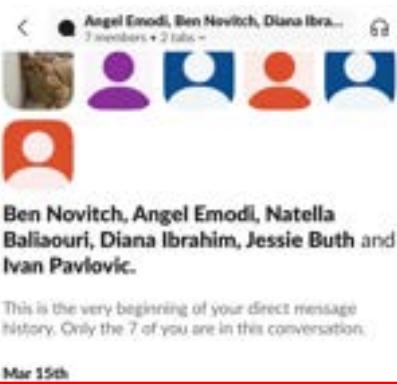
## **Evidence A (New evidence provided to UCLA)**

## **\*\*Co-Conspiracy to Misappropriate My Discovery\*\***

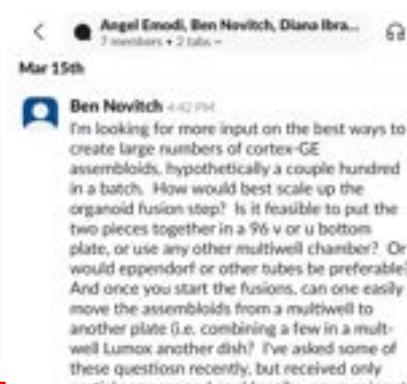
This slide connects the dots regarding the co-conspiracy to steal my novel discovery, effectively sidelining UCLA and the individual who created the protocol. The intent, motive, and opportunity exploited by the consortium PIs are evident, as they appear determined to advance their grant and personal interests rather than fulfill their obligations to UCLA. Instead of advocating for UCLA, these PIs have been promoting NIMH to secure funding based on my discovery.

On March 15, it is clear that the current organoid protocol does not allow for hundreds of organoids, as noted by Natella at 4:48 PM. Furthermore, Supervisor Novitch's initial response indicates his focus on obtaining a grant rather than adhering to the established best practices set forth by UCLA.

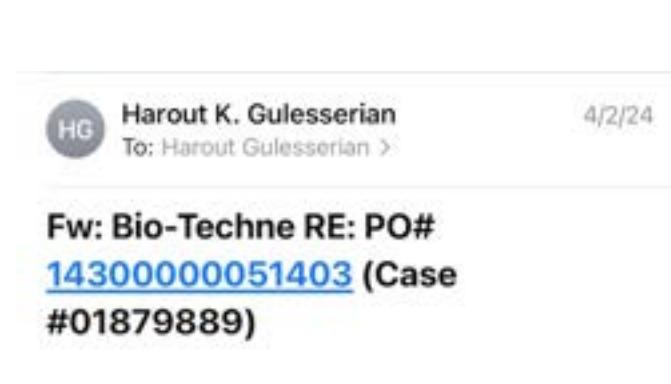
March 15, 2024



15, 2024 →



April 2, 2024



April 11, 2024



## **Evidence A (New evidence provided to UCLA)**

March 2024

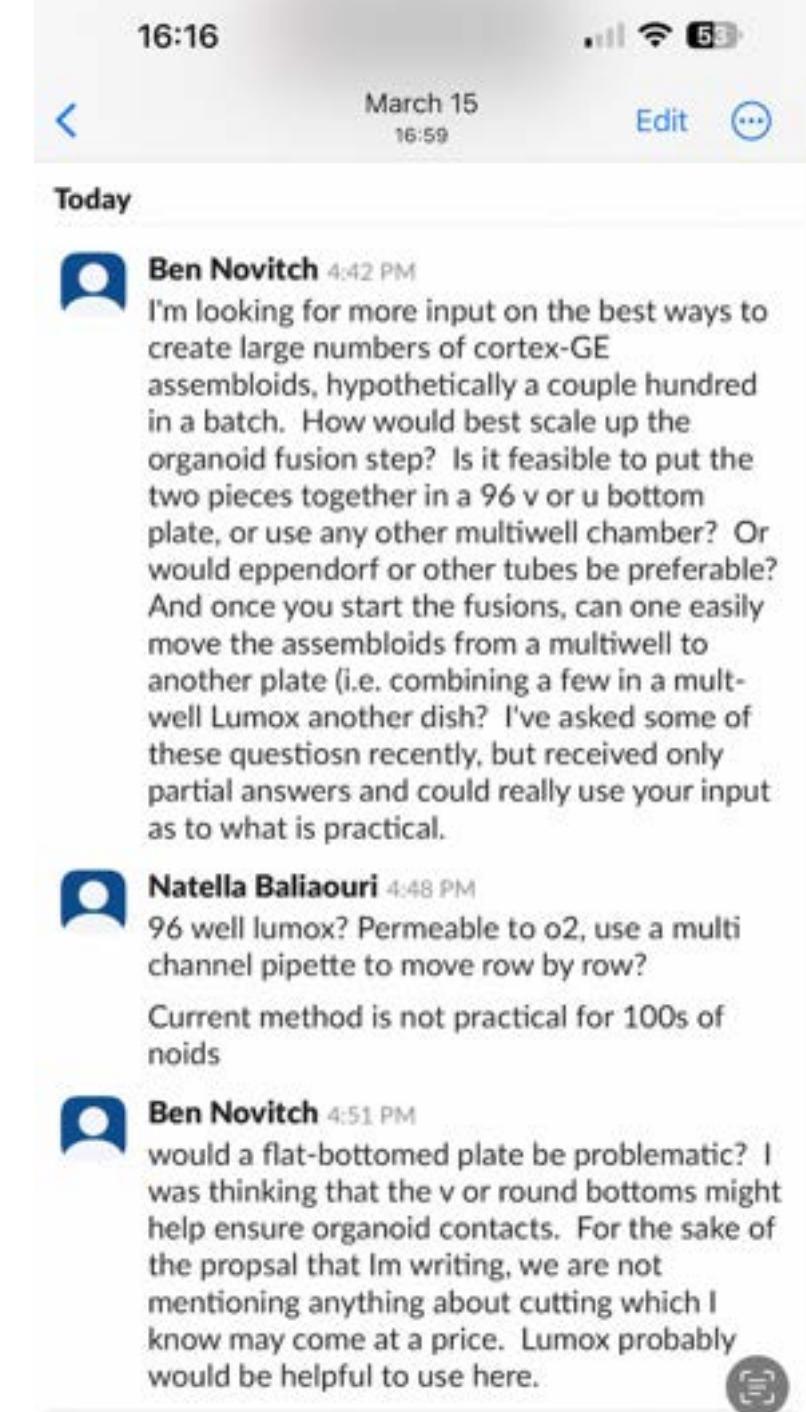
### **\*\*Undermining My Rights as an Inventor\*\***

In a group chat on UCLA Slack, discussions emerged about using my protocol for a grant that Supervisor Novitch and his colleagues were attempting to secure.

Refer to the previous and next slides for further context.

Once again, Supervisor Novitch is collaborating with the same individuals, actively working against me to

undermine my rights as an inventor and creator, effectively sidelining me to prevent proper recognition. This appears to be an attempt to discriminate against me based on my national origin and ancestry, as reflected in my appearance and manner of speaking.



# Evidence A (New evidence provided to UCLA)

March & April 2024

## \*\*Concerns Over Unauthorized Activities and Misappropriation of My Work\*\*

Supervisor Ben Novitch instructed Cendi Ling to order a new SB-590885 molecule without including me in the initial communications, raising concerns about activities conducted without my knowledge and a failure to report potentially patentable protocols to UCLA. The molecule subsequently became sold out at the primary vendor, prompting me to question Supervisor Ben Novitch about the situation. If Keith hadn't included me in the emails, I would have remained unaware of Cendi Ling's plans to replicate my work. Notably, Cendi Ling had previously attempted to present my discovery as her own during her practice oral exam in October 2023.

On Mar 21, 2024, at 10:44 PM, Gulessarian, Harout K. <[Gulessarian@mednet.ucla.edu](mailto:Gulessarian@mednet.ucla.edu)> wrote:  
Hi Ben,  
I wanted to bring to your attention that a few of us necessary in the IC, presumably have defensive measures. Specifically, here this is raising a holdup of issuance on the glass door if the invention is not visited to property. As you can imagine, this is causing delays to the lab workflow, not to mention on the basic IC level (IC trials). Could we do something to help combat this? And, specifically, is it sufficient just to let the institution to order new parts, if need be. Let me know.  
Also, as an earlier email I had mentioned the desire to complete the NIH response. The main issue is that the NIH is requesting application is asking for the funding information, regardless, there are leases that are not in my possession. If you would be so kind to please forward that information, then I can get that out of the way.  
Moreover, per your request to get a different IRB/AP instance, I am a part of Working-out-Ahead thought, perhaps it's more cost efficient to wait for the other environmental RNA sequence data before we essentially blindly move towards a different manufacturer. By our rationale, this may very well be the case because the RNA sequence data does provide additional insight as to what particular result could be exhibited for personnel, which in turn, hypothetically further allows us to identify other categories of drug that may exist instead of just continuing with the 100 IRB/AP database code. Also, to my knowledge, all the facilities are going to be one using the NIH/NIH/IRB drug is completely sold out with very low inventory. That being said, one of our greatest concern was previously referenced submission (PCTCA) of Sponsor held by the TTSK to complete the first 100+ pre-investigation application with the TTSK (aka, United States Patent Office). Noteworthy, filing the base-line investigational pre-clinical (IIP) application ensures that proper license could it had before the Federal government (further application) or prosecution. Inherence of patent prioritized prior to any other third-party submissions attempt to investigate/replicate to prevent TTSK's priority filing of my limited potential discovery, and thus opening broader intellectual property loopholes, as well.  
Furthermore, given I think now is it the right time to file the NIH/NIH/IRB drug. Since (we) are raising the question of the importance to get all the funding and ITC is still open to TTSK to not immediately comprise the pre-patent pre-clinical (IIP) application and thus ultimately secure the protection of my invention. Correspondingly, we do not yet be prepared to present the PCT application for the sake of the current application, hence specific, further looking for the filing of the maximum pre-clinical application, which would hopefully give us the additional time needed to review our gathering of the respective data needed per your filing and conduct same.  
Consequently, until the RNA sequence data comes back, and until the pre-clinical pre-clinical application is completed with IIP/ITC, the possible outcome, unless otherwise indicated, the IP is in place with us (it can become also over-extended associated license). Furthermore, presenting them on any webpage (for the sake of openness), I am investigating how exactly those subgroups (if any) can be linked with the first invention as the TTSK's provision of the America Inventor Act which predominantly maintained the U.S. as the source to the system.  
Please advise. Thank you so much and I hope you had a fantastic spring break!  
Best,

From: BENNETT NOVITCH <[bennett@ucla.edu](mailto:bennett@ucla.edu)>  
Sent: Tuesday, March 26, 2024 10:50 AM  
To: Phan, Minh D. <[MDPhan@mednet.ucla.edu](mailto:MDPhan@mednet.ucla.edu)>  
Cc: Gulessarian, Harout K. <[Gulessarian@mednet.ucla.edu](mailto:Gulessarian@mednet.ucla.edu)>  
Subject: Re: Bio-Techne RE: PGM 14300000051403 (Case #01879889)  
  
It's sold by some other companies. [https://www.jenner-jackson.com/590885.html#product\\_desc](https://www.jenner-jackson.com/590885.html#product_desc), also from Sigma though the latter is not in stock.  
Send from my iPhone  
  
On Mar 26, 2024 at 11:48 AM BENNETT NOVITCH <[bennett@ucla.edu](mailto:bennett@ucla.edu)> wrote:  
Login, is there any other vendor? However it would actually be worth testing other similar inhibitors to see if the effects are specific to SB or recapitulated by other heparinolytic drugs  
Send from my iPhone  
  
On Mar 26, 2024 at 11:48 AM Phan, Minh D. <[MDPhan@mednet.ucla.edu](mailto:MDPhan@mednet.ucla.edu)> wrote:  
#01879889  
  
UCLA HEALTH SCIENCES IMPORTANT WARNING: This email (and any attachments) is only intended for the use of the person or entity to whom it is addressed, and may contain information that is privileged and confidential. If the recipient, are obligated to maintain it in a safe, secure and confidential manner. Unauthorized disclosure 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, and delete this message from your computer.

From: BENNETT NOVITCH <[bennett@ucla.edu](mailto:bennett@ucla.edu)>  
Sent: Monday, April 1, 2024 12:14 PM  
To: Gulessarian, Harout K. <[Gulessarian@mednet.ucla.edu](mailto:Gulessarian@mednet.ucla.edu)>  
Subject: Re: Bio-Techne RE: PGM 14300000051403 (Case #01879889)  
  
Hi Harout,  
  
I am working on time sensitive grant related matters today (they are due tomorrow so are eclipsing all else), and we do not have much bandwidth to discuss some of the things that you've raised below and in earlier emails. Let's plan-on talking on the phone. I think that I should have a telephone have around 11:30-1:30pm and probably 4-5pm. If not then, Thursday 4-4pm would be the next best option. I will nevertheless repeat my wish which is to have an in-person report/proposal after I've submitted the report. I am hoping by other's hands that I know that it's the intention of the lab and institution to proceed/reimplement these, and not just your personal interest which, while great, would be hard to implement. I am hoping that you've been in contact with Combi and others in the lab in giving the institution and guidance so that we can get past this bottleneck. We also need complete replication with more cell lines to learn where the limitations are if the methods are not as universally great as has been touted. It's a win-win to get those replication studies done.  
Qd we find availability of the drug from other vendors? Products go in and out of stock all the time, so I would not read into anything there. I would nevertheless order some from wherever you can get it as that we're not without it so that we can continue testing and using it to move our research projects forward.  
Regarding the incubator, please do contact Bryan and work with Keith in getting replacement parts as needed.  
Thanks,  
Benn

Security concerns have arisen upon reviewing evidence of Cendi Ling's writing in her native language, which discusses the potential leakage of information to international entities before the United States secured rights to this invention. This situation raises serious questions regarding the confidentiality and integrity of the proprietary information related to my discovery.

# Evidence B (prior evidence provided to UCLA)

April 2024



Gulesserian, Harout K.

April 2, 2024 at 1:37 PM

Fw: Bio-Techne RE: PO# 14300000051403 (Case #01879889)  
To: Harout Gulesserian

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From: Gulesserian, Harout K. <[HGulessrian@mednet.ucla.edu](mailto:HGulessrian@mednet.ucla.edu)>

Sent: Tuesday, April 2, 2024 1:34 PM

To: BENNETT NOVITCH <[bnovitch@g.ucla.edu](mailto:bnovitch@g.ucla.edu)>

Subject: Re: Bio-Techne RE: PO# [14300000051403](#) (Case #01879889)

Hi Ben,

The intention of filing my protocol discovery with TDG was to comply with University Policy which is essentially designed to protect the IP interest under federal and state laws. Per TDG instructions, and essentially per Federal Law (which TDG explains very well to lay people like myself), filing a provisional application is imperative under Federal and International IP laws. In this instant case, the hold up to filing a provisional (not non-provisional, but provisional) time stamp under the Federal Laws is essentially failure to deliver to TDG what TDG expressly asked for: "The sponsor and MTA information are critical for processing the invention report," and thus, we were strong put on notice from TDG that the "pre-patent" provisional USPTO time stamp is nonpublic and lapses in one year with no public published material should the data prove not good, as you seem to overly be worried about, but what the provisional USPTO application shall do is further strengthen the ability to do more testing and gather more data while the IP is secured under the first inventor to file ("FITF") provision of the America Invents Act.

After discussions/dialogue with UCLA offices of Chief Intellectual Property Officer/ TDG/Associate Vice Chancellor it is evident that failing to file the provisional patent application and continuing to operate under these conditions is inconsistent with TDG instructions, University Policy, and Federal law because it exposes the IP to malfeasance and fails to safeguard IP interest as intended under the above rules. Moreover, due to such seemingly zero safeguards and an ongoing no University Policy operational scenario, I am again left with only the ability to speculate and surmise at admitted misappropriation/discriminatory lab member intentions, and as such expressly continue to reserve all my federal, state, and any other inventor/creator rights/remedies at law and in equity (if any), make zero waivers, irrespective of any action or inaction of any members of our lab or any other associates/affiliates or any others.

As far as your grant goes, I know that it's very important to you in terms of time sensitive matters, but so is the protecting the IP and it's been some time now since TDG addressed this for us and thus I am hoping my FF organoid protocol/use of SB590985 does not become subject to misappropriation/trade secret/exposure or otherwise used in any way by any 3<sup>rd</sup> party officious intermeddlers or any other until my inventor/creator interest is preserved under any and all state and federal laws. These matters are particularly important given there has been zero attempts at doing the proposed mediations to remedy the discriminatory/retaliatory/hostile/misappropriation admitted activities of all the usual lab member suspects, as I have objected and continue to object, to my protocol making it to the hands of Cendi/Natella and any others in the lab from my end until the IP inventor/creator credit is secured in line with the FITF under the America Invents Act.

This is why drafting and prosecuting the IP with the provisional time stamp shall further the end of sharing and seemingly circulating the IP for data gathering/testing purposes or otherwise making available the protocol with our UCLA lab members, other UCLA labs, or other Universities and researchers; this is why I object to any potential or existing orders or actions which fail to take the legally necessary and appropriate steps to preserve the confidentiality, drafting and prosecuting of the trade secrets/IP consistent with the requirements of UCLA policy, state, federal and all other applicable laws. In fact, the protocol/discovery was only shared with TDG and that's how you obtained the information as they were waiting for you to sign off on the application from my understanding.

It's unfortunate to talk about these things but I have noted to you many times active discrimination/retaliation/hostile misappropriation issues from the not so above-board personnel which we have yet to do any remedial mediations or any other remedial matters as you so generously offered as help to assist and improve the continuous and systematic ongoing above referenced issues in lab.

Hopefully, you will find some time to devote to these very important matters and as always please forgive any lengthy emails but until matters in lab are remedied, I remain harmed, and I can only work hard and continue to ask for help; thank you in advance for your help and assistance, as I know you are busy and I very deeply appreciate your time.

Harout

April 2024

## \*\*Co-Conspiracy to Misappropriate University-Owned IP\*\*

- Supervisor Ben Novitch co-conspired with the same individuals who informed me of their intention to steal my work before any safeguards were in place with UCLA for university-owned intellectual property.
- I have always objected and continue to object to waiving my rights, and I await UCLA's response on the next steps for IP protection.

**False statements**  
Proof: March 2024



Refer to see how these individuals deceive so easily. It is important to note that they were working on the Feeder Free (FF) organoids as early as March 2023.

Harout Gulessarian  
Delays  
To: Natella Baliaouri

April 12, 2024 at 7:30 PM

Good evening Natella,

Ben said he is going to sign off on the IP paperwork (to make sure to protect the inventors interest (me Harout Gulessarian), UCLA's interest, and the federal government/NIH interest) of my protocol and my discovery of usage of the instant molecule. The instant trade secret requires the IP to be protected for drafting and prosecuting of the IP before the USPTO office. Ben said he's going to provide the MTA and sponsor information and sign off sometime this week. I'm sure that Ben was thinking as soon as he signs off, then I can go ahead and start doing all of that stuff. I believe what happened was Ben got busy because of some grant stuff that he is "under the gun" for, because of those things it looks like we will have a slight delay. I'm sure Ben will keep you in the loop once the trade secret IP is secured.

Have a good weekend, and I look forward to a future collaboration once all is cleared from TDG.

Kind regards,  
Harout

NATELLA VAHKTANGOVNA BALIAOURI  
Re: Delays  
To: Harout Gulessarian, Cc: BENNETT NOVITCH

April 12, 2024 at 7:49 PM  
[Details](#)

Hello Harout,

If this is in regards to my slack message, which I will copy here, I don't understand the reason for this email.

"Hey harout, can I have some of your d13 organoids to generate ge, cx and hippocampus to test their potential for different brain regions? Ben mentioned you have a lot of ~d13 and we can help out with the more specific differentiation, and I'd be happy to teach you ltp and gcamp"

We would be taking organoids and using protocols unrelated to your work and developed in the Novitch lab previously. Additionally, if there are organoids at a good time point delaying it just sets everyone back as if this protocol has some issues with hippocampus generation, I won't find out in a timely manner and will likely end up using something else. Testing GE/HIP is past your IP and it would be good to know if it even works with alternative brain regions.

Furthermore, materials were wasted because you suggested preparing stem cells weeks ago and then refused to allow me to process them or to process them yourself. Because our stem cells do not grow well on FF, we wasted multiple vials upon your suggestion.

I do not understand the constant miscommunication regarding timing, the multiple instances of preparing materials for "a week from now", and the difference in how you've been treating myself from other lab members.

I have no desire to infringe on your discovery, I do not know how to make it more clear that I am offering assistance as I am literally the only person in lab with certain protocols and skills, ones that I am happy to share.

I hope your protocol is patented and published quickly, and would be happy to contribute or have Diana help out as she is on her way to being an excellent electrophysiologist herself.

All the best,

Natella

[See More from Harout Gulessarian](#)

# Evidence B (prior evidence provided to UCLA)

April 2024

## \*\*Misappropriation of Protocol and Disregard for Inventor Rights\*\*

In this instance, Supervisor Novitch attempts to frame my protocol and discovery as the collective knowledge of the lab, rather than acknowledging my individual contributions as the inventor. He expresses frustration, stating that the patent process is "driving him nuts," while pressuring me to share the protocol with individuals who intended to steal my work. Notably, Supervisor Novitch had already shared my protocol without my consent. He obtained the protocol through the TDG, not directly from me, meaning I never authorized him to have it. Instead of protecting the trade secret, Supervisor Ben Novitch disseminated UCLA property for personal gain, engaging in acts of greed and corruption that effectively sidelined me from the process and undermined my rights as an employee.

 BENNETT NOVITCH  
Re: Delays  
To: Natella Baliaouri, Cc: Harout Gulessarian

April 13, 2024 at 12:38 AM [Details](#)

I need to clear the air here, as I seem to be the initiator of this request from a conversation that I had with Ivan earlier today. He mentioned that he was unable to do many hippocampus recordings before he graduates since there have been problems with organoid formation broadly in the lab, likely related to the MEF issues. I commented to him that perhaps he could talk to Harout to see if some of the many organoids that he and Erick have been generated from the KOLF2.2J cell line could be spared and tested to see if they could be turned into hippocampus and GE, which to my knowledge still has not been formally tested. I was thinking of this as a potential win-win and perhaps give us a chance to start thinking about conducting some electrophysiological recordings which could be great for both validating the FF organoid protocol and advancing the goals of our SSPsyGene project.

I do not understand why we continue to be at this impasse with not sharing information within our lab: methods and materials to help one another openly and without conditions attached. It is counterproductive for everyone and breeds contempt. If someone in the lab is struggling or needs help- it should be provided, period.

Harout, this whole business about "the patent" is driving me nuts. A lot of work and contributions from people in the lab before you have gone into these methods, and I thus view our methods as the collective wisdom and property of the lab. Anyone working in our group should have access to that knowledge and the reagents needed. Please give the information that Natella, Cendi, and anyone else who is struggling with their organoid experiments need to see if what you've found works for you also works for them and their cells. It is imperative that we keep all of our projects moving forward as we have an obligation to our funding agencies to do the experiments that we said that we were going to do. By withholding information or providing it piecemeal, it is impeding other's progress and thus harms everyone. Funding for our Rett syndrome project has been fueling a lot of our research expenses and going towards people's salaries. If we do not fulfill our obligations and make steady progress, it puts everything at risk.

Rest assured, we will follow through with doing what is needed with submitting an invention report on these methods, but know that this is just a first step in the process of getting a patent, which is going to take more demonstration of utility, and the more examples we can generate, the better. The most tangible gains that we will likely see are potential boosts in everyone's experimental success, which could help people get their work done more efficiently, leading to more papers, better success in fellowship, job, and grad/med school applications, and enable us to get the research funding that we need to continue our research and pay for everyone's salaries. Importantly, these gains can be realized right now- not in a hypothetical future.

I would like to meet with both of you to discuss this further and make sure that we're all on the same page. Will Tuesday at 9am work for you?

Ben

[See More from NATELLA VAHKTANGOVNA BALIAOURI](#)

# Evidence B (prior evidence provided to UCLA)

April 2024

## **\*\*Critical Email Addressing Objections to Supervisor Novitch\*\***

This email is lengthy, but it is **crucial to read** in its entirety, as it outlines my objections to Supervisor Novitch's actions. In this communication, I reaffirm my obligations to UCLA, while Supervisor Novitch asserts that his responsibilities lie with the NIH, not UCLA, regarding the duty to report intellectual property to its rightful

Harout Gulessarian  
Re: Delays  
To: BENNETT NOVITCH

Hi Ben,

Once again, I am objecting and reserving all rights and making no waivers, period. Furthermore, regarding your statements as to how you view "our methods as the collective wisdom and property of the lab" is seemingly irrelevant and insidious. Moreover, let me remind you that my discovery on 09/11/2023 was a complete accident. In as much as my accidental discovery (and my declaratory "creator"/inventor credit under Federal law) is now all of a sudden being dubbed a collective lab effort according to you, arguably this defies federal, state, and university policy for many reasons, but also because you are not designated as the arbiter of law and fact with this particular decision-making process.

It is instead arguably TDG, UCLA patent counsel, CIPO, and the President who determine and opine these specific intellectual property decisions as to who is dubbed a "creator"/inventor". Had the data been coming out unfavorable regarding my accidental scientific discovery, it would seemingly be used by you to my detriment. This accidental discovery by me is by no means a collective effort, rather an employee working 7 days a week while also progressing the work of multiple grad students for two years (one who essentially seldom showed up, and another who essentially rarely stepped foot in the TC for the last 1.5 years, nor was in lab working on Saturday/Sunday (while I was there Saturdays and Sundays for no extra pay feeding their respective batches and insuring their respective projects go forward) in an ongoing hostile work environment, as I remain subjected to consisting of discriminatory, non-inclusive, retaliatory, individuals further trying to misappropriate my invention of the FF protocol and my discovery of usage of SB590885. Let me remind you that I have put you on notice about these matters for some time now. I also accepted your proposed outside mediation which you made zero attempts to schedule or execute, thus remaining with zero attempts to remedy the described retaliatory hostile workplace.

Additionally, even before my discovery when I tried to mention the non-inclusive discrimination nothing was or has been done about it. Instead, I still remain to this day intentionally marginalized to ensure I do not have a meaningful opportunity to participate and promote regarding the HIV project. Whereas others who are similarly situated can claim that they are part of this collective effort in the HIV project, but I remain singled out, even to this day. I can't count how many numerous times I have given you notice regarding that in addition even after my discovery to the numerous subsequent retaliatory hostile attempts to misappropriate the intellectual property that I created/invented by accident.

Moreover, you continued/continue to foster this toxic environment since last year, as for months upon months you would dismiss my complaints as simply things in my head and do nothing regarding these very important matters. Things had to get so bad regarding the marginalization against me with discriminatory, retaliatory, and unspeakable hostilities, intentional words and/or acts that the situation had to get so bad for you to finally believe me, that some of the very same people who you allege is their "collective wisdom" which dubs them somehow miraculously as "creators" and "inventors" of my accidental discovery, and these are the very same people who notified me in writing that it is their intent to misappropriate my intellectual property interest regarding my discovery/ protocol. Furthermore, if this was a collective lab effort, then why were individuals sending messages of the like : " Harout, please send out the protocol or else I will have to steal it somehow" ( please see imaged screenshot below).

Stealing something by definition means what is being stolen is someone else's property interest, neither the collective lab's "creator"/"inventor" interest nor any other misappropriating lab members "creator"/"inventor" interest; by this admission in writing of attempted misappropriation of my "creator"/"inventor" by other lab members it is axiomatic that declaratory "creator"/"inventor" interest from my accidental discovery is exclusively mine and not the interest of other malicious lab members.

# Evidence B (prior evidence provided to UCLA)

April 2024

Stealing something by definition means what is being stolen is someone else's property interest, neither the collective labs "creator"/"inventor" interest nor any other misappropriating lab members "creator"/"inventor" interest; by this admission in writing of attempted misappropriation of my "creator"/"inventor" by other lab members it is axiomatic that declaratory "creator"/"inventor" interest from my accidental discovery is exclusively mine and not the interest of other malicious lab members.

It is well known that whatever interest is had in intellectual property, such as that of my discovery, UCLA policy, along with state, and federal laws dictate what interest shall be had and by whom. From all of the communications with any and all University resources it is clear that I have some kind of declaratory interest dubbing me as a creator and/or inventor. To my knowledge all this time since my initial accidental discovery there are zero declarations by any of our lab members which are made under oath and punishable by penalty of perjury that assert they are "creators" or "inventors," let alone any draft manuscripts regarding the intellectual property discovery presented to TDG or any other UCLA authority asserting that there are other people besides me who share such interests.

These repeated attempts to force me to waive my rights to people who said openly they will try to "steal"/misappropriate my IP in exchange for any insinuations regarding my or any other staff pay checks, or me to otherwise be denied from securing my Federal Law interest as "inventor" and UCLA policy as "creator" certainly is not in line with UCLA policies, State or Federal law.

Again, I expressly object to any and all such malfeasance, I make zero waivers, and I reserve all rights and remedies. Let this be clear I shall not be bullied by admitted "steal" attempts and misappropriation attempts from other lab members who have gone so far as to notice me, you and by extension all of UCLA of this malicious intent in writing. What's mind boggling is I remain singled out, and the original ethnic/national origin/negative non-inclusive discriminatory intent which precluded me and still precludes me from meaningful opportunities to participate in the HIV project remains, as you are siding with these malicious intent actors and attempting to force me to waive my rights or otherwise you will essentially not provide the most basic required and necessary (in your exclusive possession) information to TDG. Maybe this discriminative ethnic/national origin/negative non-inclusive discriminatory intent which precluded me and still precludes me from meaningful opportunities to participate in HIV project likely stems and originates from you because that treatment is very similar to the treatment you are giving by intentionally precluding supplying the MTA and SPONSOR information to the patent office to initiate the patenting process. So, I think about the two things below:

- 1) Why are you not providing the information that you are supposed to provide as per UCLA policy to protect the intellectual property rights?
- 2) Why are you now telling me to destroy those property rights which includes destroying my potential Federal Law credit as "inventor" by telling me to go disclose this invention (which disclosing would likely be against UCLA policy; just to note and put you on notice you are asking me to do something that from all public notices would seemingly violate UCLA policy and is therefore something you do not have the right to arguably do yourself and by requesting me to violate UCLA policy, you are essentially violating UCLA policy) to people who have already admitted they are going to steal it?

Taking the above two things into consideration, maybe you are acting in the interest of your negative non-inclusive discriminatory intent towards my ethnic and national origin. In other words, you may think it's better to destroy the intellectual property by procrastinating and keeping the official patent application from being able to be documented and submitted while at the same time trying to have me disclose the Invention and give it away to people who said they would "steal" it because that's better than someone with my ethnic origin or nationality (or how I speak) being given any credit for their work which you see as the "Labs work collectively." Is this "Labs work collectively" definition (which does not correlate with UCLA policy) something that you apply to everybody or arguably only to people of ethnic or national regions which you have a discriminatory tendency towards?

When you personally requested from TDG, and TDG directly provided to you my draft manuscript (which I wrote by myself and I personally forwarded to CIPO/ TDG UCLA) of the intellectual property which I accidentally discovered, created/invented it was evident that you incurred some duty to this intellectual property trade secret, including but not limited to arguably safeguard this IP until TDG can draft and prosecute the claims before USPTO. Instead, it's been almost 2 months that this draft of the IP is in your possession, and here we are where you have done nothing to protect the misappropriation of the trade secret, instead you are once again siding with someone who in writing told me they will steal it, as your basically attempting to force me to waive my rights with undue influence, threats, and innuendo that paychecks may now be at issue and trying to force me to voluntarily expose the trade secret intellectual property to someone who in writing has expressly stated that they will "steal" (and I am quoting here, this is not something in my head as you so wrongfully told me for so long, but I am quoting from the direct admission made to me by the bad actors).

Based on this evidence you should be doing all to preserve and protect the IP. In fact, just last week at our April 4th meeting which lasted approximately 2:00 hours you led me to believe that I am the "inventor"/"creator" of this accidental discovery, and there was ZERO mention about any other lab members being dubbed "inventors"/"creators"; in fact, you noticed me that you will provide what TDG has been asking for since at least the second week of January, which is just basic information so as to begin the process of the provisional "pre-patent" application First to File time-stamp with USPTO to prevent trade secret misappropriation and thus preserve, UCLA's interest, NIH's Federal Interest, and my "inventor"/"creator" interest if any.

# Evidence B (prior evidence provided to UCLA)

April 2024

Based on this evidence you should be doing all to preserve and protect the IP. In fact, just last week at our April 4th meeting which lasted approximately 2:00 hours you led me to believe that I am the "inventor"/"creator" of this accidental discovery, and there was ZERO mention about any other lab members being dubbed "inventors"/"creators"; in fact, you noticed me that you will provide what TDG has been asking for since at least the second week of January, which is just basic information so as to begin the process of the provisional "pre-patent" application First to File time-stamp with USPTO to prevent trade secret misappropriation and thus preserve, UCLA's interest, NIH's Federal Interest, and my "inventor"/"creator" interest if any.

To date, instead I continue to object and make affirmative attempts to make zero waivers and reserve all my rights, as you once again fail to provide even the most simple of information to TDG, while every minute more and more attempts are made to circulate the trade secret with zero safe-guards protections, it is now abundantly clear that my interests and rights whatever they may be are facing immediate and irreparable grave damages, both legal and equitable, and you had offered to try to solve the non-inclusive discriminatory animus against me by doing outside mediation, as I so wonderfully welcomed from you.

Well, here we are, still zero attempts to remedy, whether by your originally proposed outside mediation, or otherwise. Instead, I am left with an ongoing hostile work environment where the retaliatory, misappropriating, discriminating bad actors thrive and benefit from me being marginalized and I remained bullied and I face immediate and irreparable harm, period.

Based on your last email to me (04/13/2024), it seemingly appears that the way that you see things that somehow I am to blame for any short comings of the lab (which is mind boggling given you have written notice of lab members express intent to engage in misappropriation of trade secret that not only I have an "inventor"/"creator" interest in, but that UCLA and arguably NIH express interest in); moreover, then you should stop with the animus of procrastinating to give "MTA and Sponsor information," which animus continues to still now exist even in this instant time as I draft the response, as you flat out refuse to provide this information less the demanded waiver from me (which I refuse to make any waiver; zero waivers by me, period); arguably, the totality of your actions and statements aligning with malicious lab members coupled with the written noticed intent of malicious lab members to misappropriate my interests is a common transferred and shared intent by you and each of you jointly and severally which from the facts as they stand appears to be knowingly causing express harm to my rights, title, interests, as well as UCLA's and NIH (if any). Once again, and I cannot stress this enough, you remain on notice that TDG needs your "input" regarding the sponsor and MTA information, which both are critical to UCLA for TDG processing the invention report(s) as there could be helpful/unhelpful terms in the agreements for IP protection purposes and this remains vital mandatory information that you are refraining from providing, all the while knowingly subjecting the intellectual property to unneeded exposure, especially with expressly written notice from malicious lab members expressly writing that they shall "steal" my "inventor"/"Creator" interest via my accidental discovery and invention.

So, yes, once again UCLA, TDG, and NIH, needed and still will need your input.

You effectively procrastinate and deny signing the necessary MTA and Sponsor information paperwork which is expressly necessary information for the funding that was used in order to complete the bare-bones provisional time-stamp FIRST TO FILE patent submission to the UCLA patent office and subsequently to the USPTO. Moreover, the inventor/creator credit directly affects my current, and future postgraduate and career at large, and I am harmed, and I face the prospect of suffering immediate and irreparable harm needlessly.

The way you view things about collective knowledge is seemingly arguably irrelevant as to providing the most basic MTA and Sponsor information. Essentially, it is CIPO, TDG and the attorneys/experts and others of UCLA who are the folks tasked with ascertaining who shall be dubbed a "creator"/"inventor." Arguably, neither myself, nor you nor any other lab member are a part of this specialized and very complex University Group which handles these types of issues day in and day out for UCLA. So please stop prolonging and procrastinating and let's give TDG/CIPO and all other UCLA stake holders of this group the necessary information to do their job. Let me be abundantly clear that it is NOT me that is precluding people from doing their jobs as you are trying to shift this blame on me in concert with a known express admitted potential missapprimator who you know put their malicious intentions in writing.

I on the other hand, expressly and as fast as possible delivered the trade secret intellectual property in its totality, and even tirelessly and sleeplessly drafted a draft manuscript for CIPO/TDG per CIPO/TDGs express request. I am holding nothing back from UCLA, as you erroneously attempt to make it sound that I am holding back the IP information, which I did not whatsoever because I signed sealed and delivered all the IP in my possession and memory to TDG/CIPO/UCLA per CIPO/TDG requests to do so. I have done nothing other than work at broke neck speed to bring benefit to our lab, to UCLA, to NIH, and I delivered the requisite work product to UCLA because these are the rules/procedures of UCLA TDG. **Any person who (i) accepts employment with UCLA, or (ii) uses UCLA research facilities (e.g., visiting scientists or other non-UCLA employees), or (iii) receives gift, grant, or contract research funds through UCLA and/or the UC Regents, is required to promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the University authorized licensing office (UCLA TDG's Invention Report template is available at <http://tdg.ucla.edu/submit-invention-report>)**.

). I was told by University Officials that "You should disclose your invention to TDG before the work is published or publicly presented," and this is exactly what I did at breakneck speed working weekends and nights tirelessly to report my accidental discovery and invention/creation of the Feeder Free protocol. One of the main reasons I was in fact working tirelessly so hard to satisfy the UCLA policy is for the exact reason so that we can ASAP begin to use my invention in our lab because that is the process which I was essentially explained to from CIPO/TDG and I believe UCLA wants us to follow.

# Evidence B (prior evidence provided to UCLA)

April 2024

I mean I just have to say how shockingly insidious it is that after I did all of that work, prepared a draft manuscript, all those sleepless nights, hard work at the lab which are all required in order to bring legal use of this invention in our lab, now I am being accused by you and Natella of hurting the lab by withholding my invention.

Furthermore, hypothetically there remains an argument to be made about the fact that I'm being accused by somebody, who in reality is the reason why we are not using my invention in the lab currently because they're withholding information (information which is in their exclusive possession – because this information still is not given to TDG, unlike my information which was given by me to TDG and is absolutely not in my exclusive possession) from the application is even more insidious and arguably hypothetically this could demonstrate a lack of good candor and a lack of strong moral character to some people, as it arguably demonstrates evidence of deceptive manipulated conduct and behavior with lack of any disregard for the good benefit of the lab or of the hard working employees and especially a lack of regard towards the good benefit of UCLA and UCLA's trust that they have put in us to follow UCLA policies. In addition, this hypothetically demonstrates and exposes the malicious intent that you have had all along which as I have described above might very well be based on the fact that you arguably have a discriminatory intent towards my ethnic or national origin, as I have brought up to your attention in the past. At the very minimum even if you're not a hypothetical covert discriminator your conduct and practices thus far are a motivating factor as they have had a very real and express overt discriminatory impact on my rights, title, and interests to say the very least.

Nobody in the lab helped me do this accident and thus inadvertent discovery, instead I was told by people in lab that they will out and out try to steal the trade secret/IP which I accidentally discovered, so I was left with no choice but to try to protect not just my creator/inventor right, title, and interest but also UCLA/NIH's right, title, and interest if any. Therefore, I am not "withholding information or providing it piecemeal" and therefore I am not... "impeding other progress..." as you erroneously allege because I dutifully delivered all relevant intellectual property "information" as early as mid-January 2024 with my entire invention and all relevant details from my memory of the accidental discovery via writing a draft manuscript to TDG to UCLA/CIPO in conformity with UCLA policy, which you later received from UCLA TDG yourself per your own request to them. Instead, seemingly, as the true perpetrator hurting this lab, you had this intellectual property information in full and you have procrastinated, withheld and not supplied what is in your exclusive possession: the relevant MTA and Sponsor information to TDG to move the process forward (Which MTA and Sponsor information remains exclusively in your possession, not in my possession). Instead, you are now again subjecting me to make waivers of my rights, title, or interest which I shall not do and once again object it. I reserve all my rights, and remedies and I very humbly request once again to try to protect the IP and move the labs interest, UCLA's interest, NIH's interest, your interest, my interest forward by you giving the information that is only in your possession to CIPO/TDG so there will be no harm suffered to any stakeholders by any delays and so CIPO/TDG can do their job, as the faster CIPO/TDG can do their job the faster our lab can benefit from the 1 year rule of the US patent office's provisional bare bones prepatent application. Very respectfully, I am not the one who is dilatory, in fact I submit the facts indicate that you are, and therefore, please stop abusing your leadership role/authority in order to further retaliate, discriminate, harass me, and insidiously destroy my inventor credit by falsifying unfounded allegations that I am hurting the lab because I am following UCLA policy. UCLA has strict policies against the above-described malicious activities and I reserve all rights and make no waivers, period.

Once again there, is a glaring reason that could possibly be the cause of what you see in your message to me, and that is the seeming fact that you have unexplainably procrastinated and resisted to doing what you said you were already going to do, and now you're making a big deal on top of the harm I suffered and continue to suffer, as I submit you are trying to use the harm to me which I noticed to you since last year repeated and numerous times, in order to now use the lab as an excuse for arguably covering up the fact that you still have not supplied the most basic necessary MTA/Sponsor information which you said you were already going to supply.

Whether the application will be submitted for patent or not is not up to you nor me, it is up to the UCLA Patent office, then NIH and perhaps other stakeholders, but what is up to me is to reserve all my rights title and interest and I am doing so and reserving all my rights, title, and interests (if any) and I made ZERO waivers and I continue to make ZERO waivers and I objected and I am continuously objecting to the bullying and attempts to force me to waive my rights, title, interests if any, or be subject to and remain in a discriminatory/retaliatory/hostile work environment that endlessly continues, as again I very respectfully request this abuse and harm towards me to cease and desist.

Moreover, what's important is that things are documented correctly for the history books... and once again I believe that I invented, by accident, this instant protocol myself, which undoubtedly happened to be in your lab on your labs affiliated funding, so you should be very proud of one of your employees for possibly earning a creator/inventor intellectual property credit based on the hard work that that employee did. Now, as per that employee's right afforded to him by the US patent law to appear as a "inventor" you need to provide the basic MTA and Sponsor information paperwork and disclose the proper information for the patent application to move the process forward because I am not in the possession of this information because this information remains in your exclusive possession and I can not be blamed for any of your dilatory or delayed activities that are essentially not giving this necessary information to TDG, therefore I am not impeding any lab progress as you very wrongfully try to accuse me of, but in fact I submit that you are the individual impeding TDG/CIPO and thus our lab.

Please, if there are other lab members problems who have made negative admissions in writing or otherwise, please do not try to blow those other people's unrelated problems in their work in the lab out of proportion and somehow use it as an excuse to cover up your inexplicable resistance and impotence regarding supplying the correct MTA and Sponsor information to CIPO/TDG/UCLA for the intellectual property/patent application(s) or otherwise following UCLA policies and procedures.

# Evidence B (prior evidence provided to UCLA)

April 2024

Please, if there are other lab members problems who have made negative admissions in writing or otherwise, please do not try to blow those other people's unrelated problems in their work in the lab out of proportion and somehow use it as an excuse to cover up your inexplicable resistance and impotence regarding supplying the correct MTA and Sponsor information to CIPO/TDG/UCLA for the intellectual property/patent application(s) or otherwise following UCLA policies and procedures.

Moreover, hypothetically and rhetorically, what on earth would you do in the lab previously if somebody wasn't making organoids or they can't do the job correctly prior to my inventing by accident my IP procedure for making organoids? Certainly, hypothetically, there was ongoing lab work prior to my invention and discovery, which hypothetically still can and does continue unthwarted whether my discovery/invention existed or not. Therefore, hypothetically maybe you should continue to focus on those efforts and works instead of resisting to provide the basic information to TDG/CIPO UCLA and attempting to coerce me to waive my employment/intellectual property rights, titles, interests, whatever they may be. Moreover, the remedy you seek of using my invention/discovery is simply ascertainable by you yourself providing the requisite basic information which is exclusively in your possession to TDG/CIPO as I have dutifully provided TDG/CIPO UCLA with all information which was exclusively in my possession via draft manuscripts and meetings with and per the specific instructions of UCLA officials.

I object to this hostility trying to force me and apply unlawful pressures upon me to waive my rights for whatever inexplicable reason/animus you may have that you continue to withhold.

As I have noticed you so many times, on numerous occasions, I believe this is harassment (among other issues) and this is fostering what appears yourself and the lab members created and continue creating a continuous and systematic ongoing hostile work environment by refusing to do something very simple which is evidently part of a PI's job to do as well, which is to supply the information for this application at the earliest time possible per UCLA TDG policies so the information towards the USPTO time stamp can be submitted to the UCLA patent office so those attorneys who are skilled in deciding whether something should be drafted, prosecuted and otherwise intellectual property patent pursued or not, it is those experts at TDG who can make these decisions.

I remain committed to working this out amicably and professionally.

Harout

names?

On Apr 13, 2024, at 7:30 AM, BENNETT NOVITCH <bnovitch@ucla.edu> wrote:

8:30 is also fine for me.

Sent from my iPhone

On Apr 13, 2024, at 3:50 AM, NATELLA VAHKTANGOVNA BALADURI <nbaladuri1@ucla.edu> wrote:

Hello Ben and Harout,

I have class at 10 am Tuesdays in BSRB, so I'd need to leave at 9:50, but can do 8 on Tuesday. I could also do 8:30 to have more time.

Best,

Natella

# Evidence B (prior evidence provided to UCLA)

April 2024

## \*\*Retaliation and Threats to Job Security\*\*

There is a significant job threat involved, as Ben states that his obligations are to the NIH, not UCLA, claiming that the university does not mandate the use of their services. This contradicts the policies and contracts I signed, which clearly indicate otherwise.

Furthermore, Supervisor Novitch acknowledges my serendipitous finding twice in the email. Since my return from FMLA, I have been restricted from working on my discovery, while others in the lab, including those in his wife's lab, attempt to use the molecule and gather data. There are concerns that dates may be fabricated to misrepresent the origin of this discovery. This constitutes direct retaliation against me.

BENNETT NOVITCH

Re: Delays

To: Harout Gulessserian, 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](mailto:bnovitch@ucla.edu)  
Web: <http://novitchlab.com>

# Lab Meeting Summary

## April 18, 2024 – Novitch/Butler Lab

During this meeting, Supervisor Novitch's spouse Supervisor Samantha Butler made comments suggesting she had access to the emails I sent to her husband, PI Bennett Supervisor Novitch. **These emails contained HIPAA-related matters that I did not wish to disclose to her, as it violates my privacy rights.** Samantha's remarks were unfounded and directed at me. For instance, while looking directly at me during the lab meeting, she stated, "Sorry you have been robbed," and then used the term "candor" in a sentence. She looked at me again and mentioned that her sister-in-law had sent her an email using that same wording over the weekend, making it clear that I was the one who had sent that email to Supervisor Bennett Novitch. This pattern of retaliatory behavior has noticeably increased since my novel discovery and has intensified as I've advocated for both UCLA's rights and my own as an employee.

The screenshot shows an email from Harout Gulessarian to Bennett Novitch. The email is dated April 16, 2024, at 2:26 AM. It starts with a greeting and then discusses the supervisor's comments about the sender's emails containing HIPAA-related matters. The email concludes with a statement about hypothetical conduct and its impact on the sender's rights and interests.

Hi Ben,

Once again, I am objecting and reserving all rights and making no waivers, period. Furthermore, regarding your statements as to how you view "our methods as the collective wisdom and property of the lab" is seemingly irrelevant and insidious. Moreover, let me remind you that my discovery on 09/11/2023 was a complete accident. In as much as my accidental discovery (and my declaratory "creator"/inventor credit under Federal law) is now all of a sudden being dubbed a collective lab effort according to you, arguably this defies federal, state, and university policy for many reasons, but also because you are not designated as the arbiter of law and fact with this particular decision-making process.

Furthermore, hypothetically there remains an argument to be made about the fact that I'm being accused by somebody, who in reality is the reason why we are not using my invention in the lab currently because they're withholding information (information which is in their exclusive possession – because this information still is not given to TDG, unlike my information which was given by me to TDG and is absolutely not in my exclusive possession) from the application is even more insidious and arguably hypothetically this could demonstrate a lack of good candor and a lack of strong moral character to some people, as it arguably demonstrates evidence of deceptive manipulated conduct and behavior with lack of any disregard for the good benefit of the lab or of the hard working employees and especially a lack of regard towards the good benefit of UCLA and UCLA's trust that they have put in us to follow UCLA policies. In addition, this hypothetically demonstrates and exposes the malicious intent that you have had all along which as I have described above might very well be based on the fact that you arguably have a discriminatory intent towards my ethnic or national origin, as I have brought up to your attention in the past. At the very minimum even if you're not a hypothetical covert discriminator your conduct and practices thus far are a motivating factor as they have had a very real and express overt discriminatory impact on my rights, title, and interests to say the very least.

## Evidence A (New evidence provided to UCLA)

# SUSPICIOUS ADMIN LEAVE

## AUGUST 6<sup>th</sup>-19<sup>th</sup>

This is a clear example of the direct retaliation I was facing. Upon returning from FMLA on August 6, 2024, I was immediately placed on what was initially termed an FMLA extension, which was later changed to “Admin Leave.” See next slide



ML  
Lucas, Mark  
Return to lab  
To: hkg90@icloud.com

Inbox - iCloud August 5, 2024 at 5:33 PM

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 13<sup>th</sup>.

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

# Evidence A (New evidence provided to UCLA)

## \*\*Concerns Regarding Admin Leave and Communication Issues\*\*

During the meeting, Helen Nguyen stated that my FMLA extension is now considered Admin Leave. However, this

Admin Leave was incorrectly documented, as she only recorded the period from August 11 to 17 on my pay stub, despite my leave being designated from August 6 to 19 as a half day. In Supervisor/CAO Mark Lucas's email to me on the 5th, he instructed me not to show up to the lab without an assignment. When I followed this instruction and arrived on the 13th, I spent the entire eight hours in the lobby of CHS

because Supervisor Novitch and Lucas had not communicated any assignment for me, despite my prior establishment of a novel use of a molecule and a protocol with substantial commercial value. UCLA rightfully owns this discovery, and I should receive credit for it. I had to voice my objections and plead with Nguyen to understand the true circumstances surrounding this situation, but she turned a blind eye to my concerns, failing to fulfill her job responsibilities. This impacted me negatively because



Nguyen, Helen A.

RE: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessarian - HRC0301037  
To: Harout Gulessarian, Cc: UCLA Health Employee Relations, LOA Team

August 14, 2024 at 8:39 AM

Details

Hi Harout,

Please reach out to Dr. Novitch to schedule a Return-to-Work meeting with him for your first day back. Your timesheet will reflect your administrative leave from Tuesday August 6 through Friday August 9, Monday August 12, and Tuesday August 13, 2024.

Best Regards,

Helen Nguyen, (She/Her/Hers)  
Human Resources Analyst  
Department of Neurobiology  
David Geffen School of Medicine at UCLA  
P:(424) 440-3429  
E: [HelenANguyen@mednet.ucla.edu](mailto:HelenANguyen@mednet.ucla.edu)



From: Harout Gulessarian <[hkg90@icloud.com](mailto:hkg90@icloud.com)>

Sent: Tuesday, August 13, 2024 4:20 PM

To: Nguyen, Helen A. <[HelenANguyen@mednet.ucla.edu](mailto:HelenANguyen@mednet.ucla.edu)>

Cc: UCLA Health Employee Relations <[UCLAHealthEmployeeRelations@mednet.ucla.edu](mailto:UCLAHealthEmployeeRelations@mednet.ucla.edu)>; LOA Team <[LOATeam@mednet.ucla.edu](mailto:LOATeam@mednet.ucla.edu)>

Subject: Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessarian - HRC0301037

[See More from Harout Gulessarian](#)

of Found It Sent - iCloud Mailbox



Harout Gulessarian

Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessarian - HRC0301037

To: Nguyen, Helen A., Cc: UCLA Health Employee Relations, LOA Team

August 14, 2024 at 12:29 PM

Details

Dear Helen,

I am writing in response to your recent email regarding my timesheet and the Return-to-Work meeting with Dr. Novitch.

I noticed that the email states, "Your timesheet will reflect your administrative leave from Tuesday, August 6 through Friday, August 9, Monday, August 12, and Tuesday, August 13, 2024." However, I was never given any prior notice, nor was I provided with a meaningful opportunity to be heard regarding this "administrative leave." In fact, all prior communications indicated otherwise. I would appreciate it if you could compare the emails and clarify the basis and reasoning for this administrative leave.

I must object to this designation, and I expressly reserve all rights without making any waivers. Furthermore, the email you sent me earlier specified that my first day back would be Tuesday, August 13th, with no mention of any administrative leave.

Lastly, Ben Novitch suggested... "if you want to speak with either Mark or Helen about return-to-work logistics, please contact them directly. Mark is in the Neurobiology office (CHS 73-235) most days, though always best to contact him in advance in case he has other meetings going on. Both are very responsive by email" ... therefore I am reaching out to you (Helen) to get this process going.

Please clarify this matter at your earliest convenience. Thank you.

Best regards,  
Harout Gulessarian

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

# Evidence A (New evidence provided to UCLA)

In this email, the Employee Relations Manager is blind copied along with Nguyen regarding a meeting held with Supervisor Novitch. During this meeting, these individuals began making false and misleading statements, which appears to be a consistent pattern of their deceptive practices.

Employee relations manager, Vera Moubayed, never responded to this email either

Found in Sent - iCloud Mailbox

 Harout Gulessserian

Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessserian - HRC0301037

To: Nguyen, Helen A.; Bcc: Vera Moubayed

August 15, 2024 at 2:08 PM

Details

Dear Helen,

I wanted to follow up on a few important matters that I raised during today's meeting that were not followed up in today's meeting by Ben and were left undiscussed. These matters still require deeper exploration and discussion. These matters need to be documented and need to be discussed and referenced for all relevant departments at UCLA. Please advise as to proper form including time, place, and manner of reporting.

In September 2023, I invented a protocol in the Novitch lab involving a novel use of a molecule that has potential for patenting. Despite my repeated attempts to have Ben follow UCLA policy and best practices by reporting my invention/discovery appropriately, he refused to do so.

Due to these concerns, I disclosed the information to the patent office (TDG) as required by policy. The discovery was first disclosed to the vice chancellor of TDG (A. Naiberg) on 1/12/2024 to which vice chancellor guided me to the chief intellectual property officer of UCLA (C. Arora) in which three draft manuscripts were delivered to TDG to begin the process of protecting university assets, and giving the proper credit to the creator/discoverer (Harout).

On February 6, I received a message that suggested an intention to take what I had created in the lab by Bennett's graduate student on Slack. Later, on February 23, 2024, when Ben discovered my disclosure to TDG, he reacted with extreme hostility, which left me feeling shaken, uncomfortable, scared, and intimidated (Email evidence of this hostility does exist). As time was moving forward these hostilities were increasing. It was on April 24, 2024, when both Samantha Butler and Ben Novitch yelled at me in a public area on the first floor of CHS with public bystanders passing by. I reported this incident to Mark Lucas twice, explaining that it contributed to my need for FMLA leave. However, Mark provided me with the wrong email address, which was supposed to be yours, and he also failed to report the incident himself to HR as required. Furthermore, Mark claimed to be the FMLA initiator yet did not initiate FMLA leave for me, Harout.

During today's meeting, Ben expressed that he does not want me to continue with the work I invented in the lab before my health leave and suggested discussing these matters without your presence. Additionally, he stated that he cannot accommodate flexible hours for me at this time, which was a condition of my return and an accommodation for my healthcare needs. This is a violation of my FMLA return and healthcare requirements.

Furthermore, I still haven't received a response regarding the reasons for my Administrative Leave, which concerns me. I am committed to ensuring my rights are respected and would appreciate your attention to these issues.

If possible, I would like to request that any future meetings with Ben be held over Zoom, with you present as well, to ensure transparency and address any concerns appropriately.

Thank you for your time, and assistance.

Best regards,  
Harout Gulessserian

[See More from Harout Gulessserian](#)

## Evidence A (New evidence provided to UCLA)

Found In Sent - iCloud Mailbox

**HG** Harout Gulessarian  
Re: Leave of Absence Return to Work Notice Reminder  
To: Nguyen, Helen A.; LOA Team; chr@chr.ucla.edu; UCLAHealth-HR@mednet.ucla.edu

August 5, 2024 at 8:56 PM

[Details](#)

Hi Helen,

Thank you for your prompt response and for updating my information as I continue to not have access to do so myself.

I wanted to inform you that while I was able to obtain the return-to-work healthcare note (see attached below), I have not had enough time to complete the "Return to Work" certification document, as your request came in today and my anticipated return date is tomorrow. I will reach out to my healthcare provider to obtain the necessary certification and will provide it to you as soon as possible.

Additionally, I received an email from Mark Lucas today (08/05/2024) at 5:33pm stating that, due to Professor Novitch being on vacation and no assignments being available for me to complete, my return to work is delayed until August 13. He mentioned that I will be paid for the period from August 7 to August 10 but asked that I do not return to the lab before August 13 (see below).

Thank you for your understanding, and I will keep you updated on my progress.



2001 S. Barrington Ave, Ste 314, Los Angeles, CA 90025

August 5<sup>th</sup>, 2024.

To Whom It May Concern,

Mr Harout Gulessarian is our patient, and has been under our care at EB PSYCHOTHERAPY since 4/24/2024. I am writing to inform you that Mr Gulessarian has made significant progress and is now ready to return to work. To ensure a smooth transition back to work, I recommend that he be extended the following accommodations: flexible hours, and stress-free work environment.

Please feel free to contact me if you have any questions or require further information regarding Mr Gulessarian's return to work. Thank you for your understanding and cooperation in supporting Mr

On August 19th, I attended an in-person meeting with Supervisor Ben Novitch on my first day back from FMLA, where Helen, the HR representative, was supposed to be present as confirmed through email but failed to reasonably accommodate me without notifying me. This left me vulnerable to a more hostile work environment and further retaliatory behavior from Novitch, which had been the reason for my taking the FMLA in the first place. During the meeting, Ben dismissed me in an angry tone, expressing that he felt I was not ready to return to work. He stated, “I cannot offer you anything; you are only a staff research associate. You might just be an author on a paper at most,” in reference to my novel discovery and protocol. Bennett proceeded to state that I should go home and that I was not ready to return back to work in a retaliatory manner.

# **Evidence A (New evidence provided to UCLA)**

August 27<sup>th</sup>, 2024

**\*\*Unauthorized Attempts to Replicate My Discovery\*\***

Jessie Butch and Negein S are attempting to recreate my work, as evidenced by the three plates of Feeder-Free organoids on the middle shelf, left-hand side. These organoids utilize the same molecule I discovered, indicating their efforts to replicate what I had already created and established. This was all occurring during my FMLA where most were hoping that I would not return to the lab.

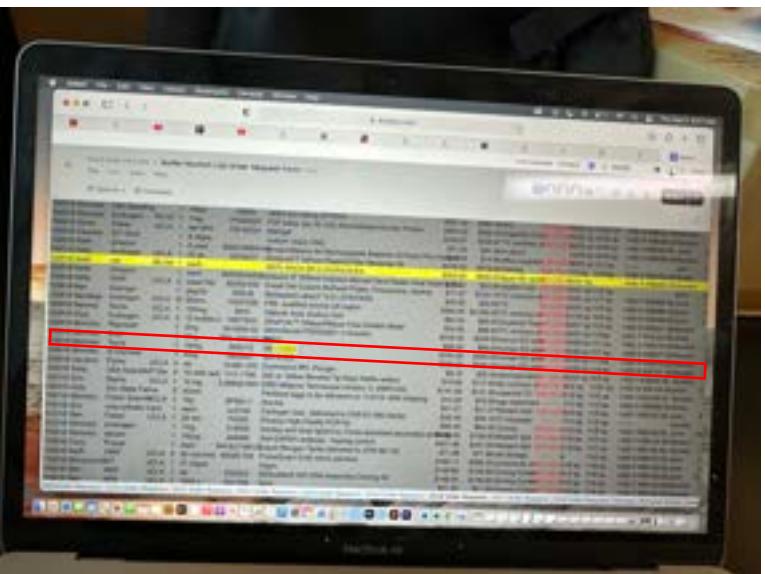


## Evidence A (New evidence provided to UCLA)

## Timeline of SB590885 Purchases

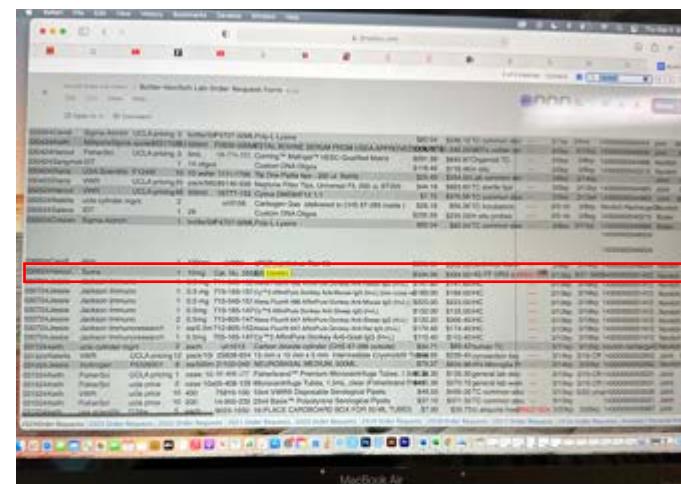
1

1<sup>st</sup> time purchased  
10/29/2018. The  
molecule was used in  
a different protocol at  
a different stage that  
did not work out



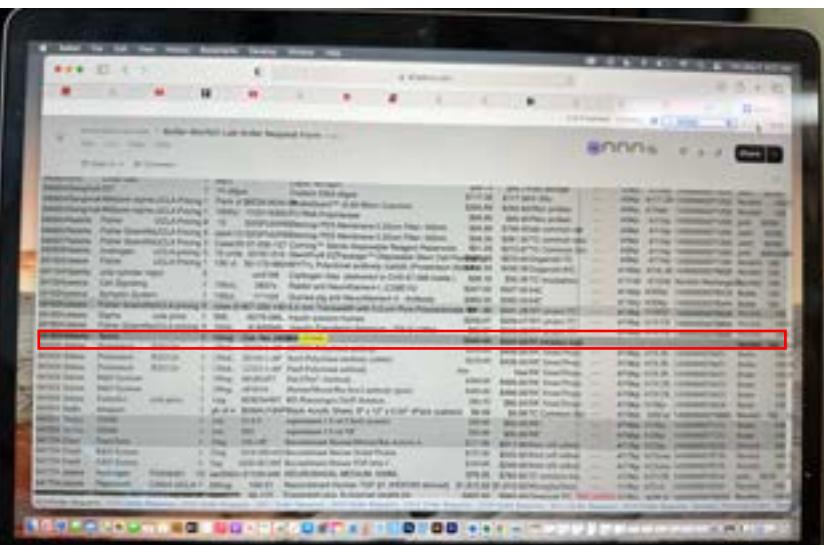
2

Next time Purchased  
03/06/2024 by me, Harout  
Gulessarian. I used the  
molecule during neural  
induction in my protocol  
back in September, and got  
the organoids to work with  
the protocol that I generate



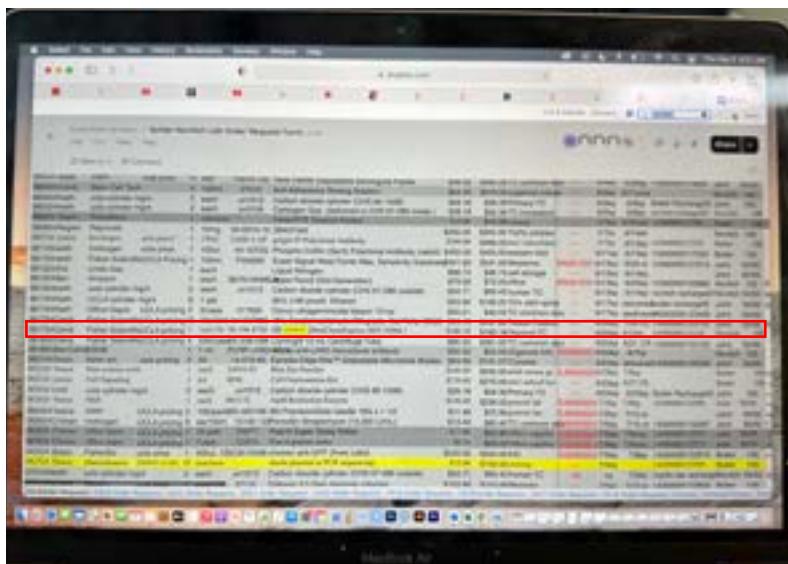
3

04/16/2024  
Natella tried to  
Order the molecule



4

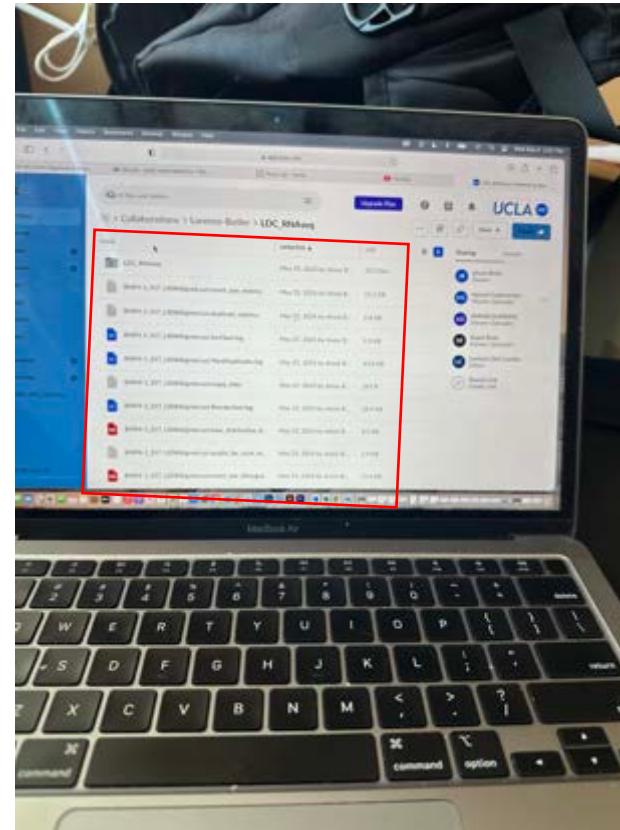
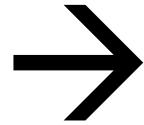
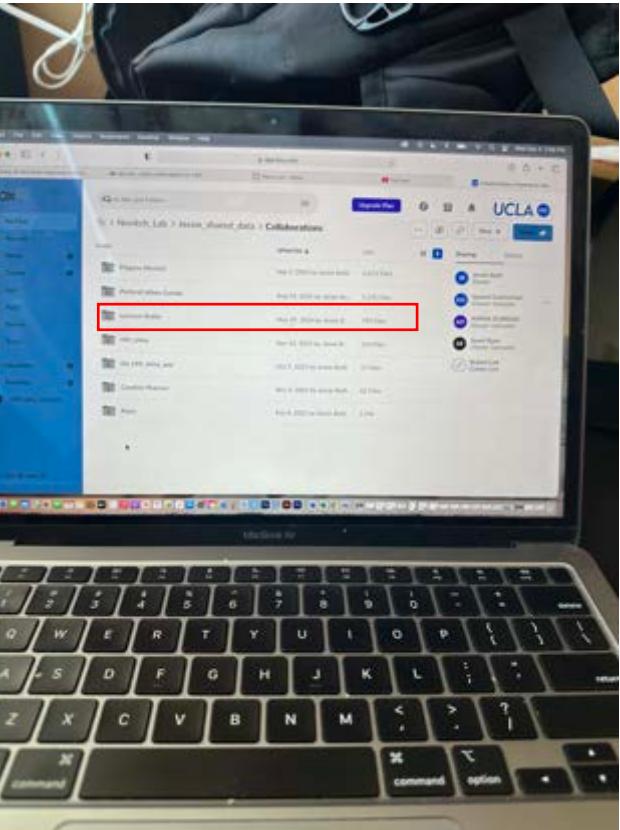
06/17/2024  
Cendi Liing orders  
the molecule



# Evidence A (New evidence provided to UCLA)

May 2024

**On May 29, 2024, Jessie Buth conducted RNA sequencing for the Butler lab, seemingly with the intent to fabricate the origins of the discovery.** There are significant overlaps between the results obtained from Butler lab members and those from the Supervisor Novitch lab, raising numerous indications of potential research misconduct and data falsification. Later in the presentation, you will see Buth attempting to develop a different Feeder-Free brain organoid protocol than the one I created. It appears there are efforts to downplay my contribution and suggest that Jessie Buth, Supervisor Bennett Novitch, and their lab were working on my discovery prior to my original findings. This claim is untenable, as I possess the original vials from the first order made in the lab back in 2018.



## Evidence A (New evidence provided to UCLA)



**September 20, 2023, Vial #1**



**October 2, 2023, Vial #2 Vial #3 Vial #4**

**Note:** In my case, I intended to grab SB-4, the more commonly used SB molecule within the scientific community, but accidentally picked up the SB-5 molecule instead. I began using it without realizing the error, and after 18 days, I discovered I had used the wrong molecule. Surprisingly, however, it enhanced the performance and appearance of my organoids. All original vials contained approximately 1000 µL each there was 4 of them, and they were not only resuspended in DMSO but also in ethanol, as the solution had not been frozen.

## Evidence A (New evidence provided to UCLA)

Sandeep Gupta  
07/30/2024  
orders CDX2 gene antibodies



**Note:** Following the suspicious RNA sequencing, further retaliation occurred, culminating in Butler lab members ordering antibodies and genes that directly correspond to my RNA sequencing results, all while I remained excluded from working on my discovery. These individuals have verbally admitted to me that they are using my molecule in their lab in attempts to fabricate the origin of the discovery. This represents a serious misconduct and integrity issue in research.

A. Date	B. REASON	C. VENDOR	D. COUNTA-REQ	E. UNIT	F. CATALOG	G. Description	H. FQNT	I. PRICE
07/23/24	None	Fisher Scientific	UCLA pricing	1	100ml/kit	02-338-188	Corning® 25 ml Centrifuge Tube	100.25
07/23/24	None	VWR	UCLA pricing	10	pack/box	89140-836	Nuprene Filter Tube, Universal Fit, 200 ml	144.38
07/23/24	None	Fisher Scientific	UCLA pricing	3	Case/Box	97-300-137	Corning® Sterile Reusable Reagent Box	385.21
07/23/24	None	VWR	UCLA pricing	3	bag/box	14467-016	Merkel Cell Vaccine, 1000 Units/Ml	387.22
07/23/24	None	Fisher sci	UCLA pricing	2	kit/kit	99540-012	Neoprene Filter Mem, 20-0.1 TC20	344.18
07/23/24	None	Invitrogen	PS188001	1	500ml	43349403	Liquoriferous 5000 TransActivator reagent	577.51
07/23/24	None	UCLA cylinder ingest		4	1-gal		WPA (100 proof) Ethanol	3095.20
07/23/24	None	Invitrogen	UCLA pricing	2	each	461013	Carbon dioxide cylinder (OHS-67-286) aux	574.80
07/23/24	None	WilmCen		3	10 tests	Replicate 10	Myofibrillar™ - Myoplasma Detection Kit	314.71
07/23/24	None	wilm		2	100ml	0218	Myoplasma PCR Detection Kit	314.71
07/23/24	None	Fisher sci	UCLA pricing	4	32ml	936010	Protein Diamond Antibody Markers	3219.00
07/23/24	None	UCLA cylinder ingest		2	each	461106	Carbogen Gas (delivered to CHS 67-288)	325.40
07/23/24	None	Jackson Immuno		2	400	000-0776	qPCR plus	500.00
07/24/24	None	UCLA Gas		1	each		liquid Nitrogen	500.00
07/24/24	None	Life Sci	Quimex 5503	40	Set	17502148	N2 Supplement	395.26
07/24/24	None	Invitrogen		4	1g/10ml	461012	EtOH 95%	320.00
07/24/24	None	StemCellTech		1	100ml	279203	Acetone	340.00
07/24/24	None	FisherSci	UCLA pricing	2	100ml	923512290	Bandelin Water Chemicals	1146.44
07/24/24	None	Jackson Immuno		2	0.5 mg	711-005-252	AF 647 AffinPure Donkey Anti-Rabbit IgG	3176.00
07/24/24	None	Jackson Immuno		2	0.5mg	713-005-125	AF 647 AffinPure Donkey Anti-Chicken IgG	3176.00
07/24/24	None	Jackson Immuno		2	0.5mg	716-005-148	Cy™3 AffinPure Donkey Anti-Sheep IgG	3150.00
07/24/24	None	Invitrogen		4	500ml	07513	Dilute solution	3188.00
07/24/24	None	Invitrogen	UCLA Pricing	1	100 ml	12905-030	Chemically Defined Lipid Concentrate (C	387.15
07/24/24	None	Invitrogen	UCLA Pricing	1	ea/500ml	113360-070	System Pyluate (200ml)	311.46
07/24/24	None	Invitrogen	UCLA Pricing	2	ea/500ml	05510-060	Gibco HEPES (LM) 100ML	343.91
07/24/24	None	VWR	UCLA Pricing	10	120ml/ml	53589-304	Tube strips with individually attached lo	312.97
07/24/24	Sandeep	OD48		2	1ml	106-CDX2-1A-000 ammine		310.00

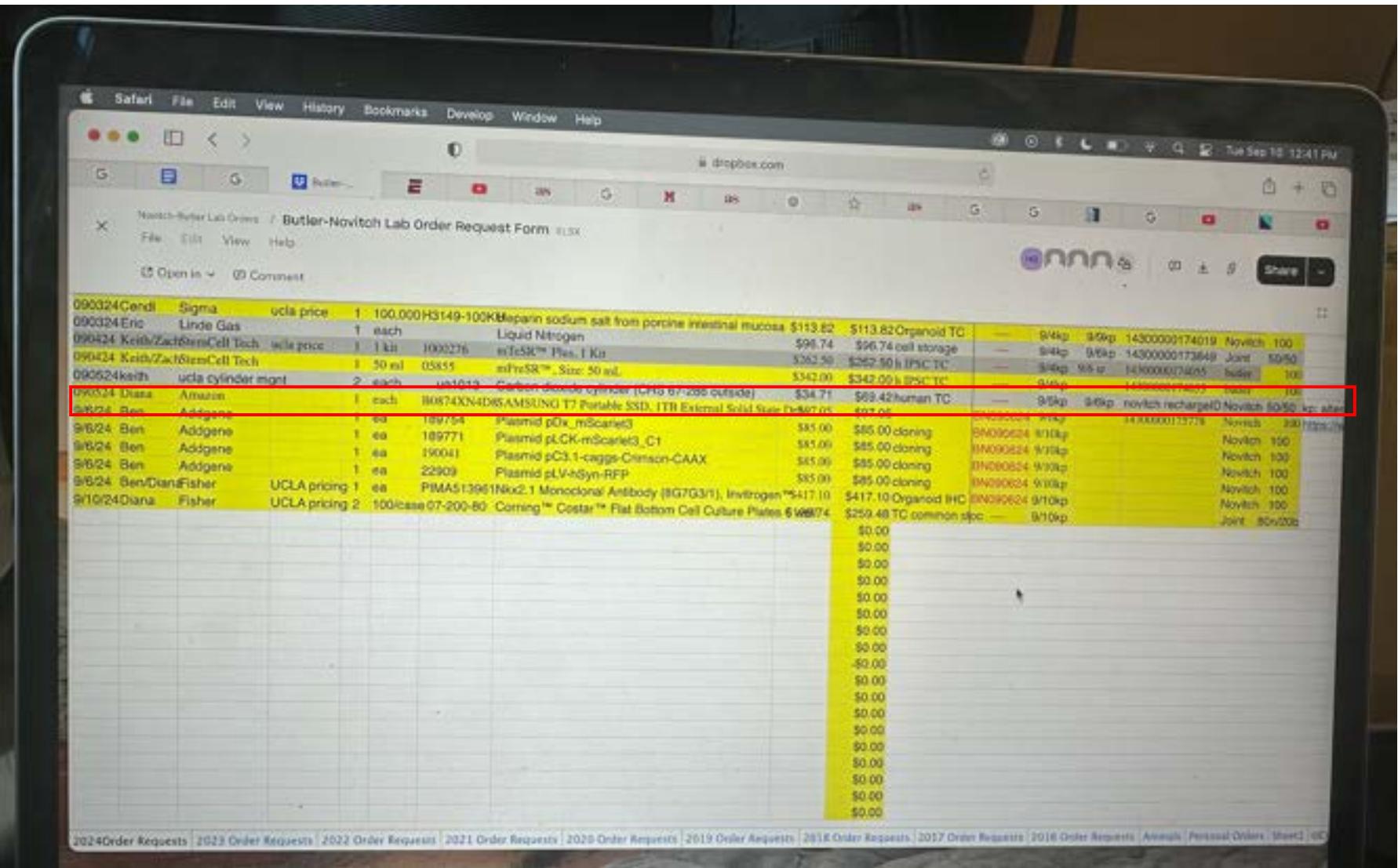
A. Date	B. REASON	C. VENDOR	D. COUNTA-REQ	E. UNIT	F. CATALOG	G. Description	H. FQNT	I. PRICE
08/05/24	None	Invitrogen	UCLA cylinder ingest	2	each	un1013	Carbon dioxide cylinder (OHS-67-286)	
08/05/24	None	Invitrogen	DT4005117	10	4 million	A34182	CF1 Murine Embryonic Fibroblasts, irradiated	
08/05/24	Sandeep	Proteintech		1	20ul	55493-1-AP	HisG125 Rabbit IgG polyclonal	
08/05/24	Sandeep	Proteintech		1	20ul	38780-1-AP	HisG13 Rabbit IgG polyclonal	
08/05/24	Ben/Diana/Sandeep	UCLA	UCLA pricing	3	5mg	230806-5146	Indoleamine Cyclopentenone, N, californicus	
08/05/24	Keith	UCLA cylinder ingest		2	each	un1013	Carbogen Gas (delivered to CHS 67-288)	
08/22/24	None	Invitrogen	UCLA Pricing	20	500ml	11739095	GEM	
08/22/24	None	Invitrogen	UCLA pricing	2	100ml	33340050	MEM Non-Essential Amino Acids (10x)	
08/22/24	Ben/Diana/Keith	Invitrogen	UCLA pricing	1	ea	A21121	Goat anti-Mouse IgG1 Secondary Antibody, A	
08/22/24	Ben/Diana/Keith	Invitrogen	UCLA pricing	1	ea	A21127	Goat anti-Mouse IgG2A Secondary Antibody	
08/22/24	Keith	Reprocell		1	10mg	04-0010-10	SR421542	
08/22/24	Ben	Addgene		1	ea	339187	Plasmid JAWS1.5A-2A-puro-pA, pWNT1-0forn	
08/22/24	Ben	Addgene		1	ea	237201	Plasmid pGEM1-eGFP-mCherry/C2AKR	
08/22/24	Ben	Addgene		1	ea	381512	Plasmid pCMV3-1-mGFP-antenn	
08/22/24	Keith	Office Depot	UCLA pricing	2	1/box	217538	Clontech Ultrafree-micro filter, E116	
08/22/24	Keith	UCLA cylinder ingest		1	ea		95% DEB alcohol, Ethanol	
08/22/24	Angel	Biologenid		1	25 test	330613	Aleks Fluor® 468 anti-human TRA-1-60 R Anti	
08/22/24	Angel	Biologenid		1	25 test	330705	Aleks Fluor® 647 anti-human TR6-1-R1 Anti	
08/22/24	Ben	Addgene		1	ea	330792	Plasmid mTnT-mCherry-mGFP	
08/22/24	Ben	Addgene		1	ea	376002	Plasmid pH2B-mRFP1-H2A.C	
08/22/24	Keith	UCLA cylinder ingest		2	each	un1013	Carbon dioxide cylinder (OHS-67-286 outside)	
08/22/24	Keith	Biologenid		1	25 test	330613	custom DNA oligos	
08/22/24	Keith	Biologenid		1	25 test	330705	700ul Revived Tips (yellow) (50)	
08/22/24	Keith	Invitrogen		1	1ml	130-050-101	Dead cell removal kit	
08/22/24	Keith	Twink		2	plastic	0-402-927	Clontech GenoGel Custom	
08/22/24	Keith	Invitrogen	UCLA Pricing	1	10ml	33349-013	Primerase UTP	
08/22/24	Keith	Invitrogen	UCLA Pricing	1	25 ml	300-0681	Dermat 3 Supplement	
08/22/24	Keith	Shan Cultures		1	40 PK	250500-48	HGT qPCR Standard	

Sandeep Gupta on  
08/16/2024  
orders HOX gene  
antibodies



HOXB1 was the top result for my day 3 organoids from my discovery. After they ordered this antibody they also ordered HOX gene oligos to do qPCR to confirm my results. This activity Plays a vital role in identifying fraudulent misappropriation Occurring at UCLA putting the entire institution at risk for research investigation.

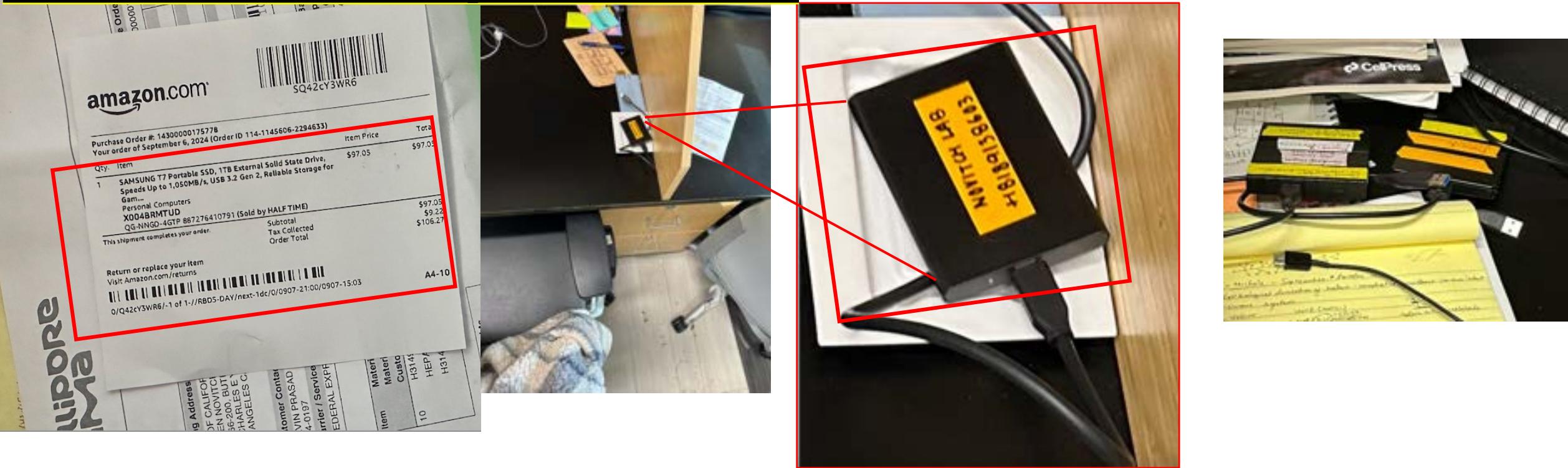
## **Evidence A (New evidence provided to UCLA)**



**Portable hard drives  
are being ordered and  
now are a common  
practice in this lab to  
have and to transfer  
data**

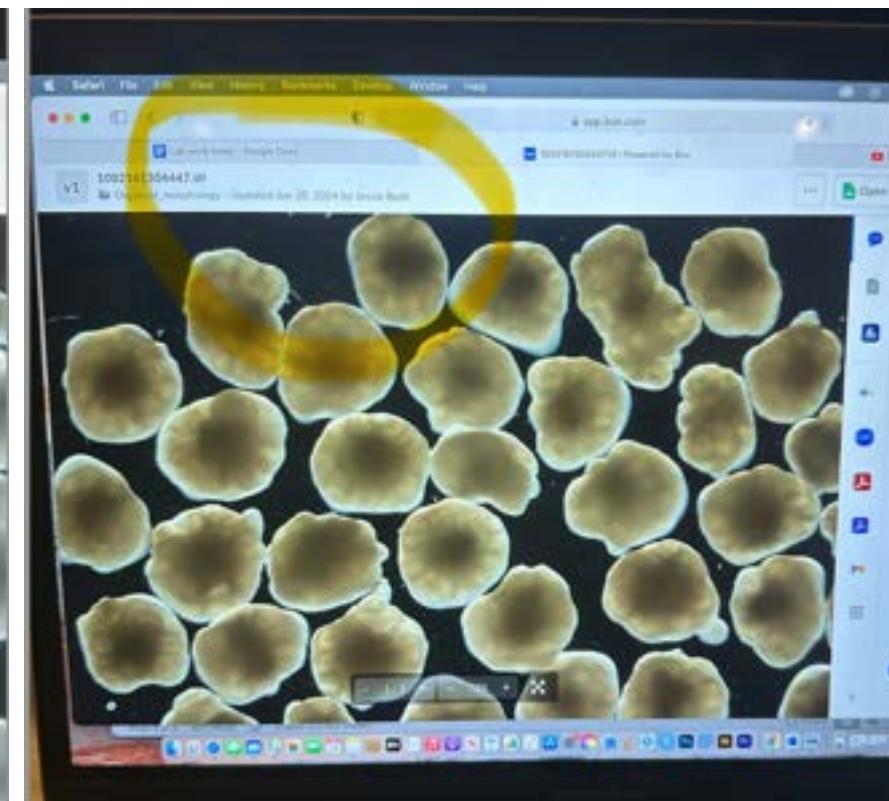
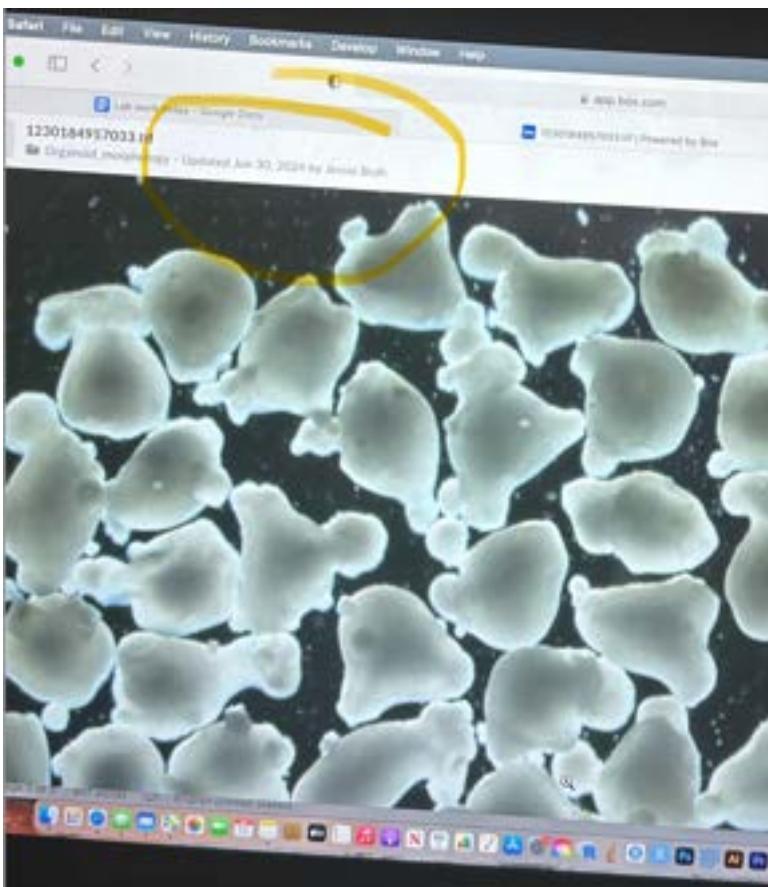
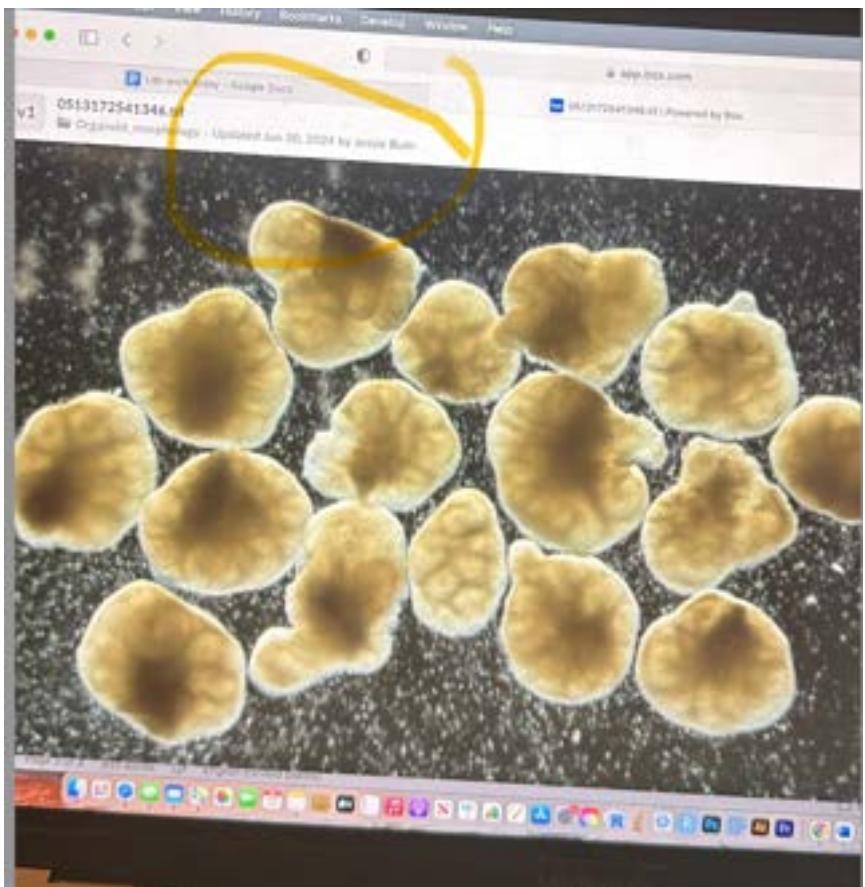
**\*\*See next slide**

## Evidence A (New evidence provided to UCLA)



There is evidence that external hard drives are being ordered in the lab and/or used as a common practice, despite the availability of a UCLA Box account. This account allows for secure, direct uploads of images to the cloud, mitigating the risks associated with storing data on unprotected servers. The decision to utilize external hard drives raises concerns regarding compliance with data protection policies and could suggest potential data fabrication or mismanagement.

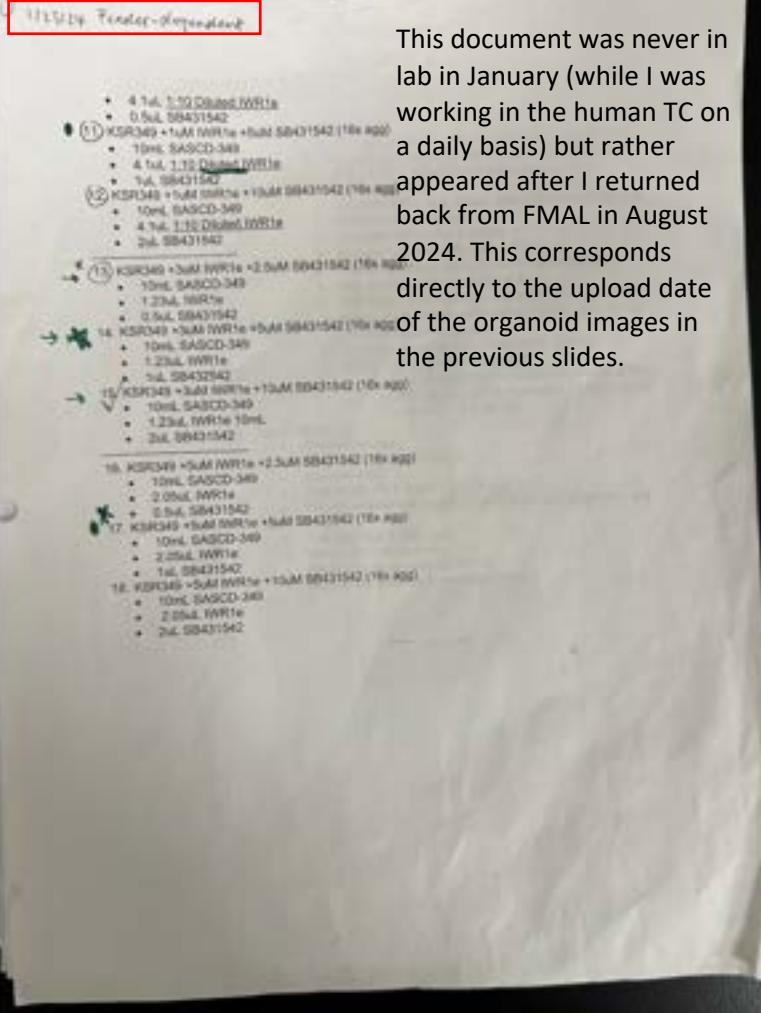
## Evidence A (New evidence provided to UCLA)



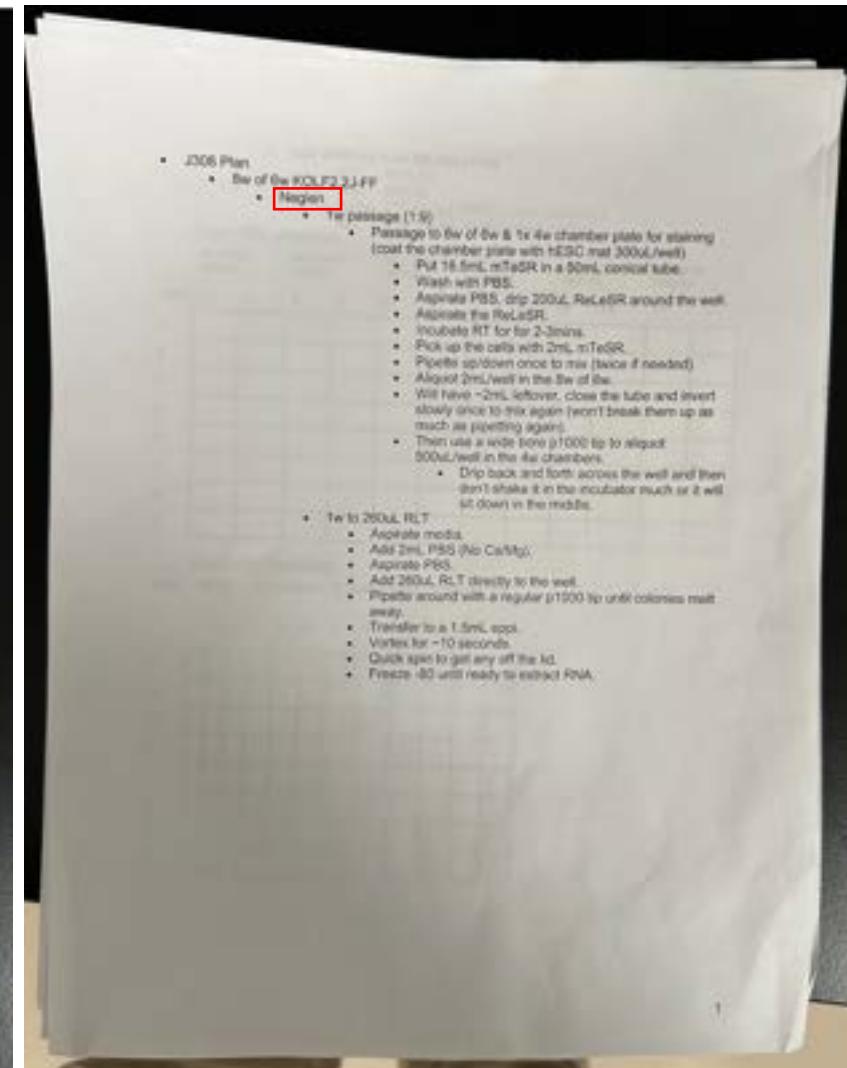
There appear to be attempts to fabricate the origin of the discovery, as I had already established my Feeder-Free (FF) protocol back in September 2023. Recent uploads (June 30, 2024) made by graduate student Jessie Buth on her Box account demonstrate that this work was conducted AFTER my discovery, not before.

## Evidence A (New evidence provided to UCLA)

- Media / solutions to make (make 2x of everything if both plating today)
  - Make 1.5L diluted NWR1a
    - 24L NWR1a + 18L SAS CD
  - Make 1.5L diluted SB-590
    - 14L SB-590 + 9L SAS CD
  - Make 1.5L diluted DMSO
    - 1L DMSO + 1L SAS CD
- For J9 & NS plates
  - House ROCK1 SAS CD (48w) ~ ~~responsible for 1-2M of cells for cloning~~
    - 10mL ROCK1
    - 10mL ROCK1
  - 20μM ROCK1 SAS CD (48w)
    - 6mL SAS CD
    - 12mL ROCK1
  - DMSO (12w)
    - 6mL SAS CD
    - 12mL ROCK1
    - 1.24mL DMSO (stock)
  - 3μM NWR1a (12w)
    - 6mL SAS CD
    - 12mL ROCK1
    - 7.37mL 1.10 diluted NWR1a (stock 10mg/mL)
  - 0.25mL SB-590 (2w)
    - 3mL SAS CD
    - 6mL ROCK1
    - 1.2mL DMSO (stock)
  - 0.25mL SB-590 (12w)
    - 6mL SAS CD
    - 12mL ROCK1
    - 1.2mL DMSO (stock)
  - 1mL SB-590 (1w)
    - 3mL SAS CD
    - 6mL ROCK1
    - 1.2mL DMSO (stock)
  - 1mL SB-590 (1w)
    - 3mL SAS CD
    - 6mL ROCK1
    - 1.2mL DMSO (stock)
  - 3μM NWR1a + 0.25mL SB-590 (2w)
    - 6mL SAS CD
    - 12mL ROCK1
    - 7.37mL 1.10 diluted NWR1a (stock 10mg/mL)
    - 1.2mL 1.10 diluted SB-590 (stock 10mg/mL)
  - 3μM NWR1a + 0.25mL SB-590 (1w)
    - 6mL SAS CD
    - 12mL ROCK1
    - 7.37mL 1.10 diluted NWR1a (stock 10mg/mL)
    - 1.2mL 1.10 diluted SB-590 (stock 10mg/mL)
    - 1.2mL DMSO



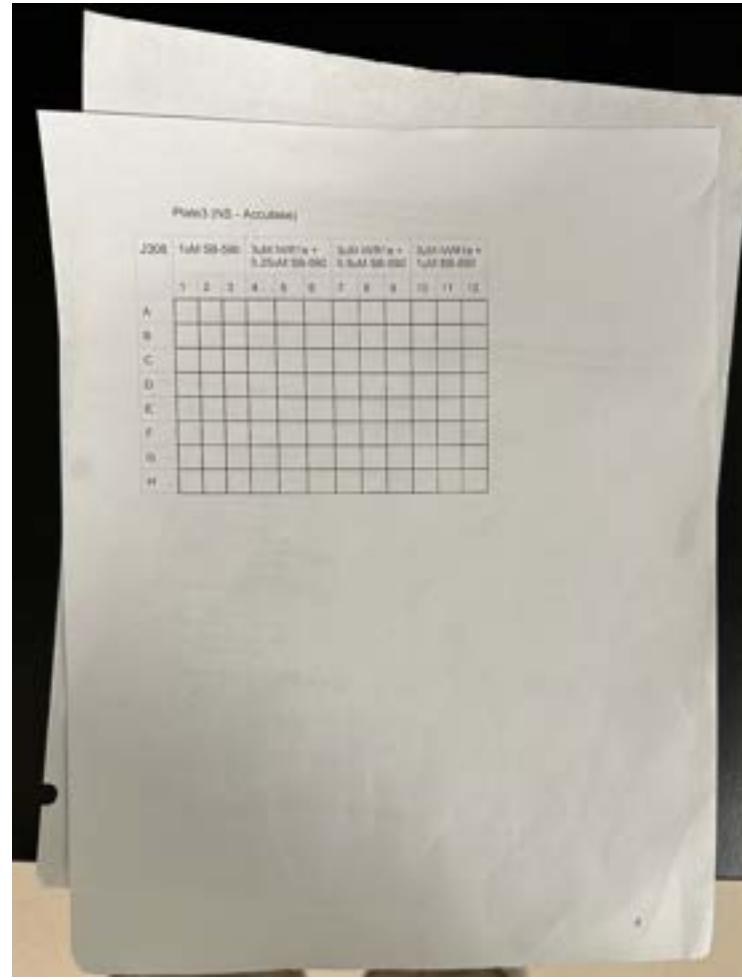
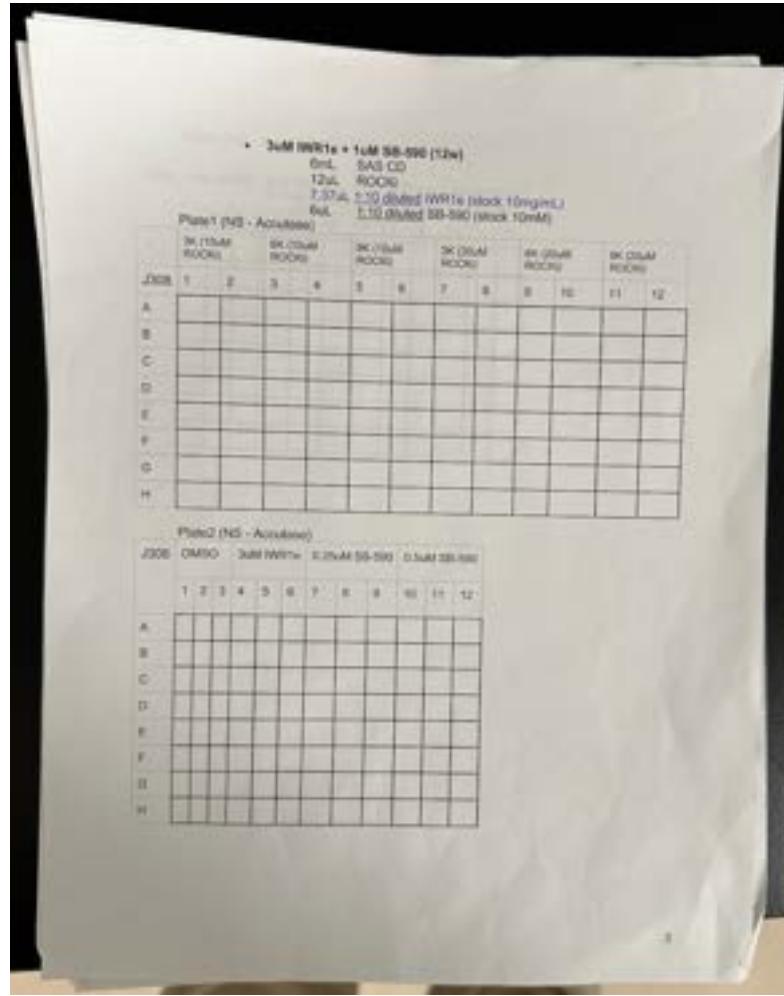
This document was never in lab in January (while I was working in the human TC on a daily basis) but rather appeared after I returned back from FMAL in August 2024. This corresponds directly to the upload date of the organoid images in the previous slides.



**Part 1:** In the human tissue culture room, I found documents created by graduate student Jessie Buth. These documents indicate a clear attempt to utilize SB590 to generate feeder-free organoids using a “separate protocol.” This appears to be an effort to fabricate the origin of the data.

Please note that the student originally tasked to work with me, Negein S, is the same individual who initially attempted to misappropriate my work to Cendi Ling. In this instance, she is seen collaborating with Jessie Buth, which seems to be an effort to fabricate the origin of the discovery. All of this occurred while I was on FMLA.

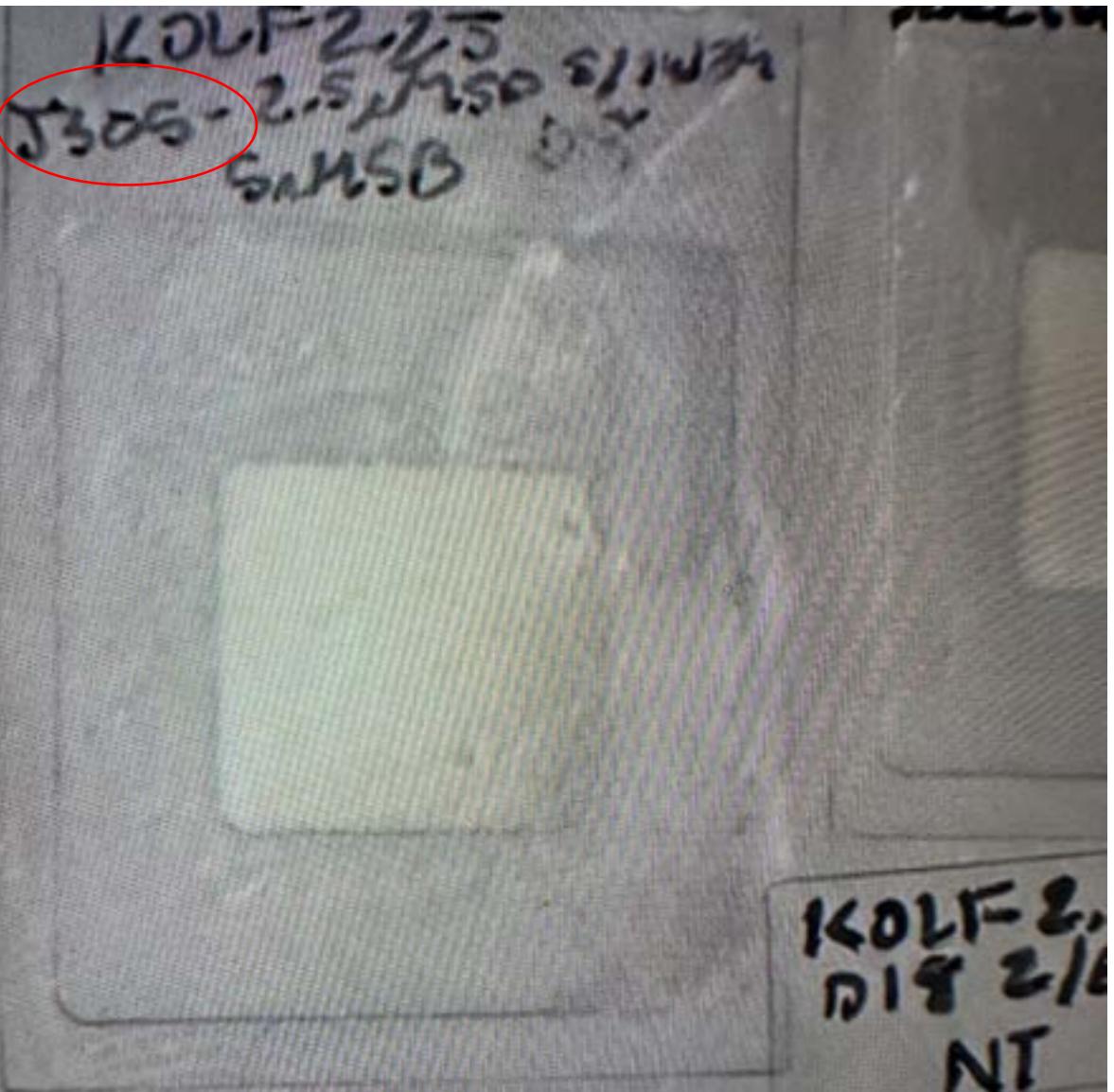
## Evidence A (New evidence provided to UCLA)



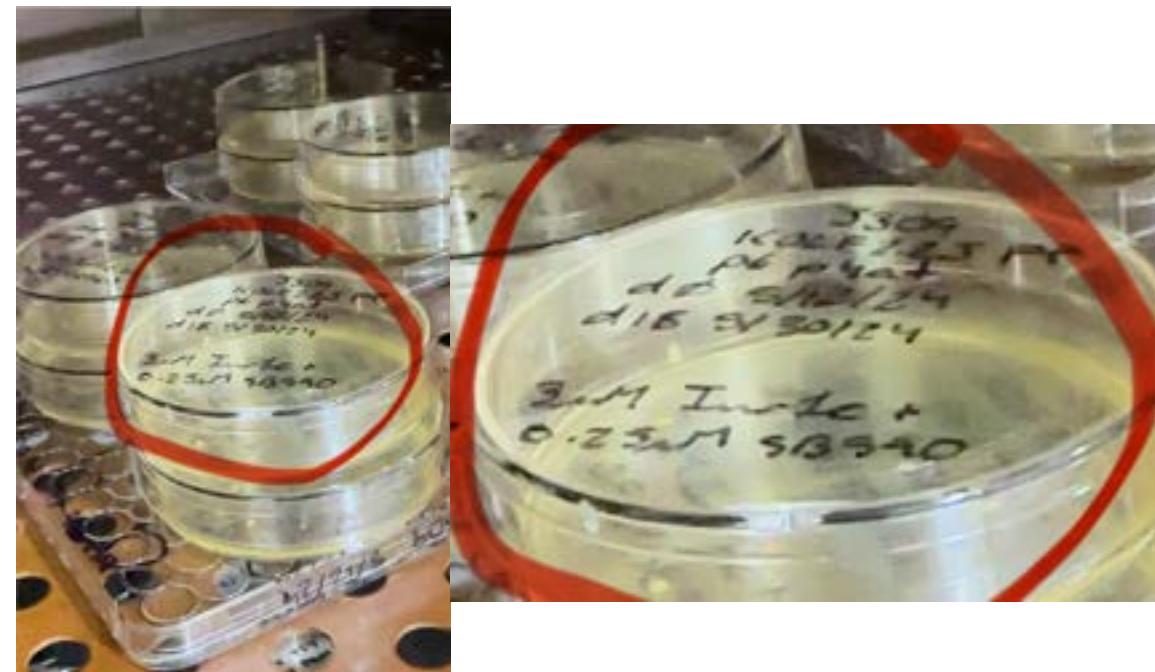
## Part 2:

This is a continuation of the previously shown protocol. Supervisor Novitch claims that my discovery was a product of the collective knowledge of the lab. However, if that knowledge already existed, why are there attempts to recreate it?

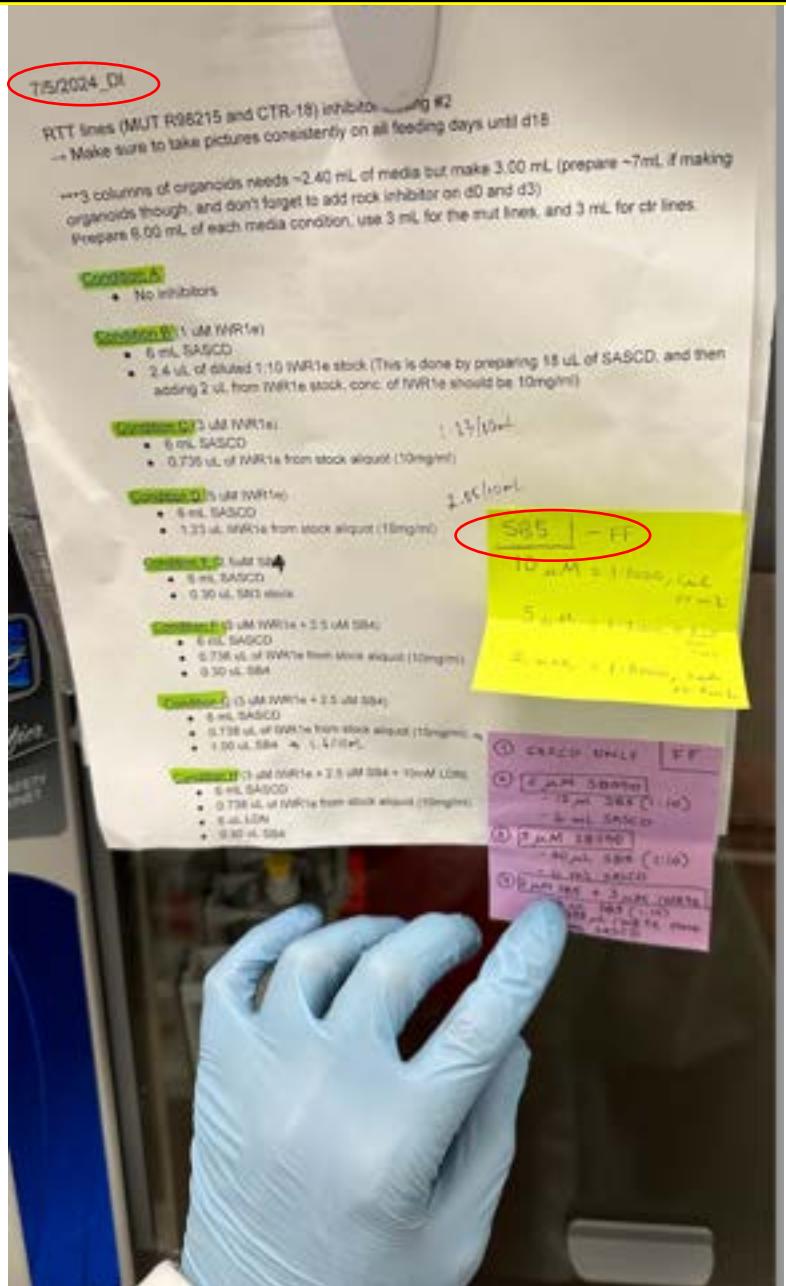
## Evidence A (New evidence provided to UCLA)



This cryomold contains feeder-free organoids that have been prepared for staining to demonstrate neuronal expression. The block is labeled 5/14/2024, which suggests that the lab was attempting to replicate my work while I was on FMLA. It appears they hoped I would not return to the lab, and that they would claim my discovery as their own.

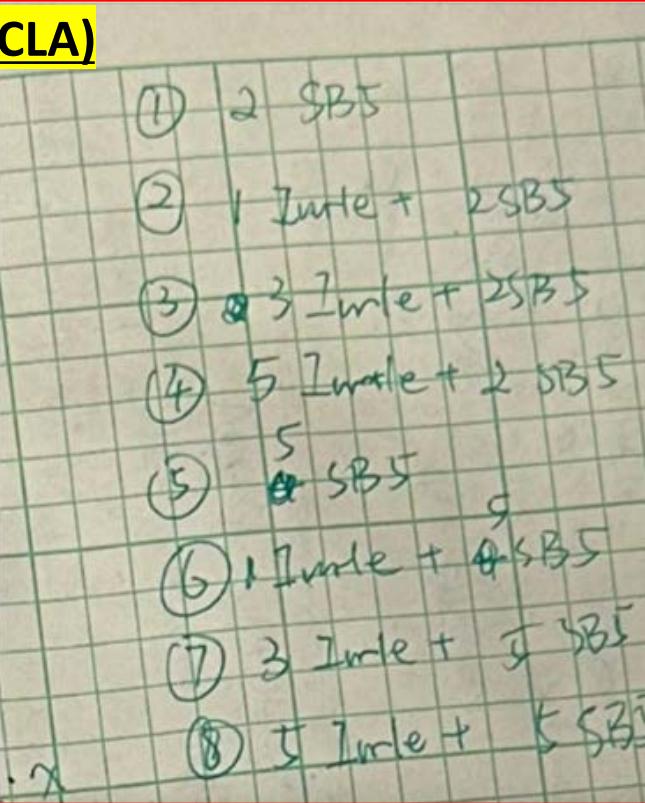
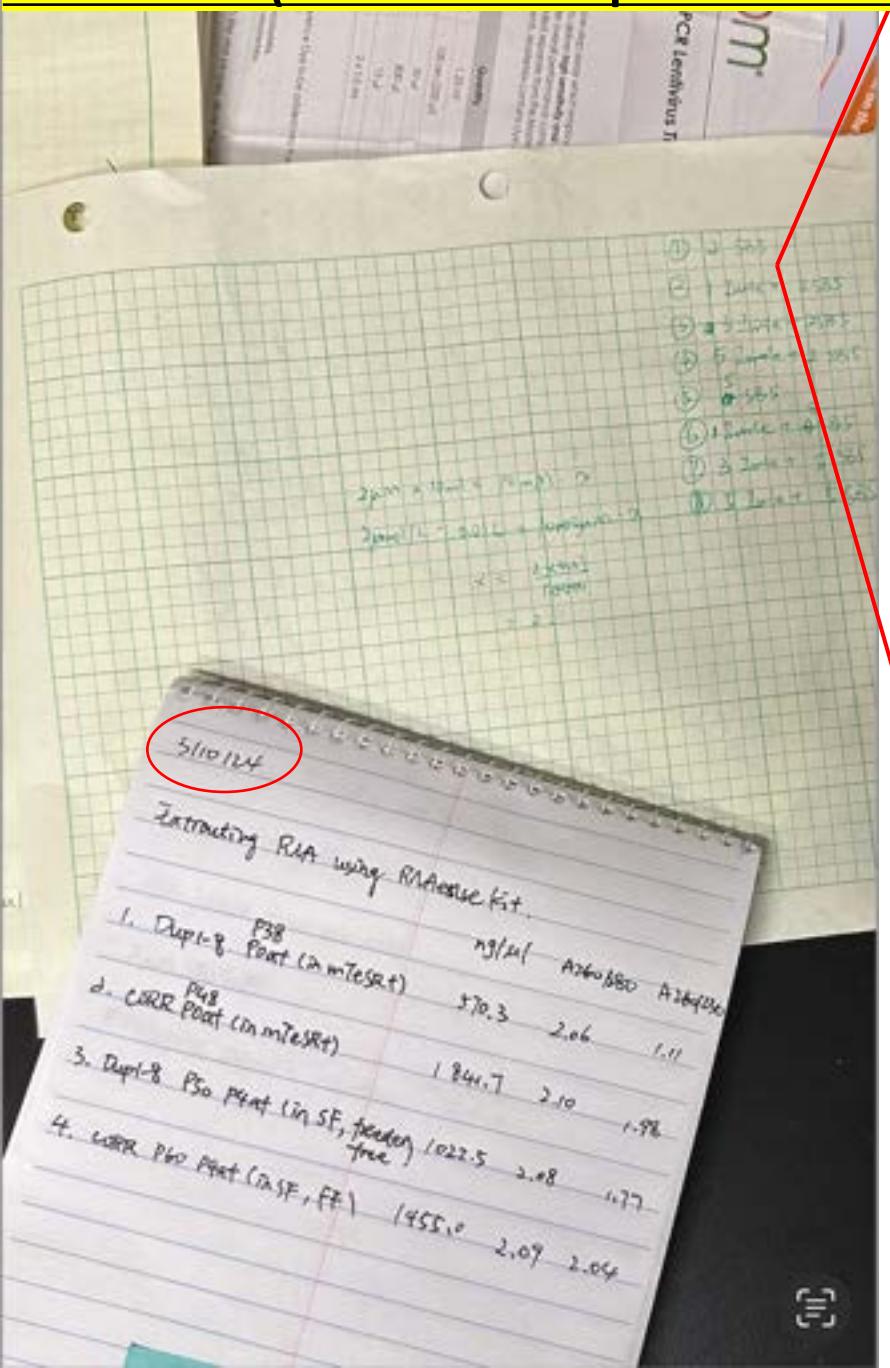


## Evidence A (New evidence provided to UCLA)

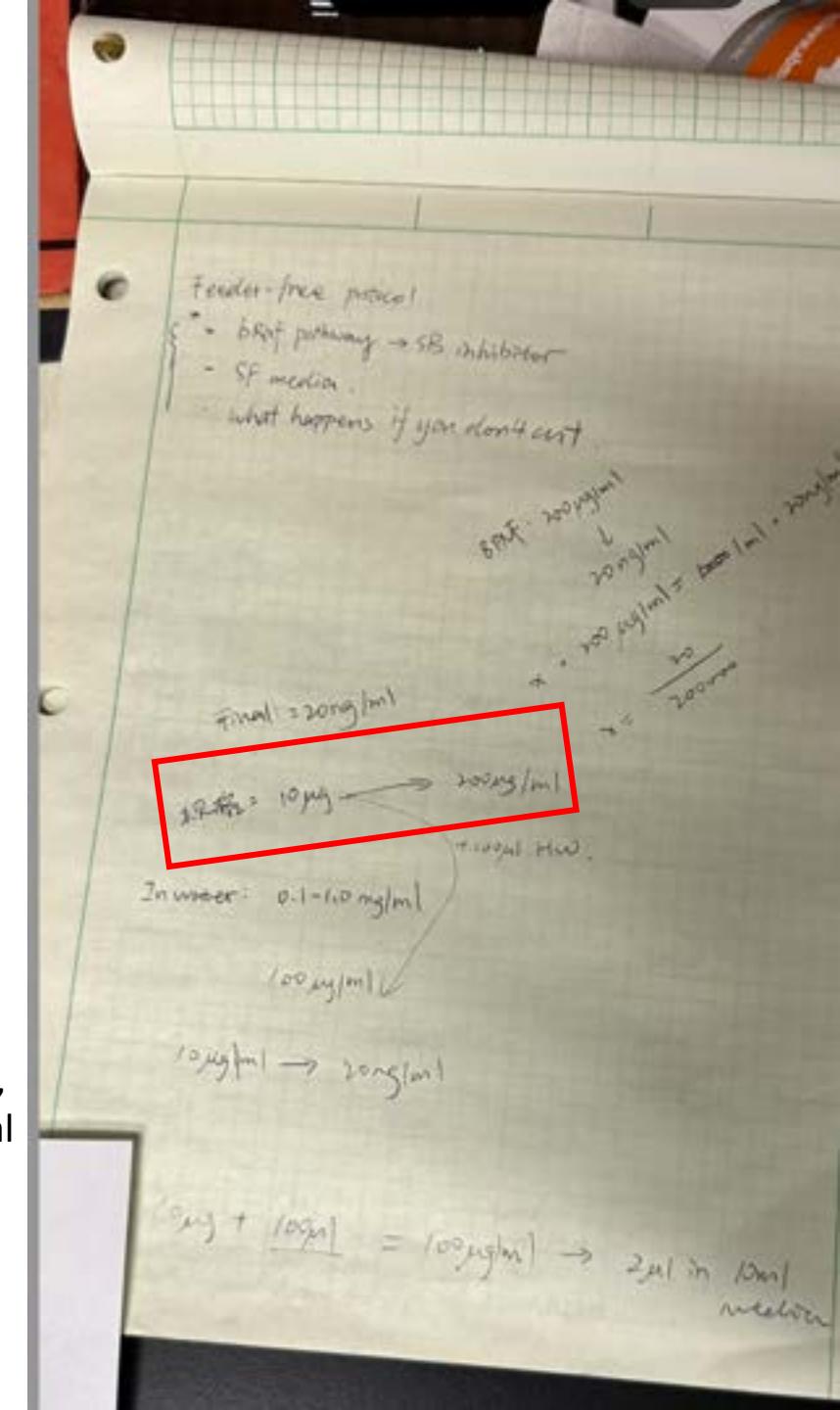


In this instance, Diana (DI), a staff researcher in the Novitch lab, who worked directly with the graduate student that messaged Gulessarian on Slack threatening to steal his discovery, is attempting to obscure the use of SB5 in feeder-free (FF) organoids. She records this information on disposable sticky notes instead of official lab documents.

## Evidence A (New evidence provided to UCLA)



I observed a document on the lab bench that clearly indicated attempts to utilize SB5 in a feeder-free protocol, despite my not having shared my protocol. Additionally, there is writing in a foreign language on the document, raising concerns about a potential international breach. I would like to reference Supervisor Novitch's email in which he requested that I share the protocol, even though his student already possessed it without my knowledge.



## Evidence A (New evidence provided to UCLA)



- ① 2 SB5
- ② 1 Inlet + 2 SB5
- ③ 3 Inlet + 2 SB5
- ④ 5 Inlet + 2 SB5
- ⑤ 5 SB5
- ⑥ 1 Inlet + 4 SB5
- ⑦ 3 Inlet + 4 SB5
- ⑧ 5 Inlet + 5 SB5

## Evidence A (New evidence provided to UCLA)

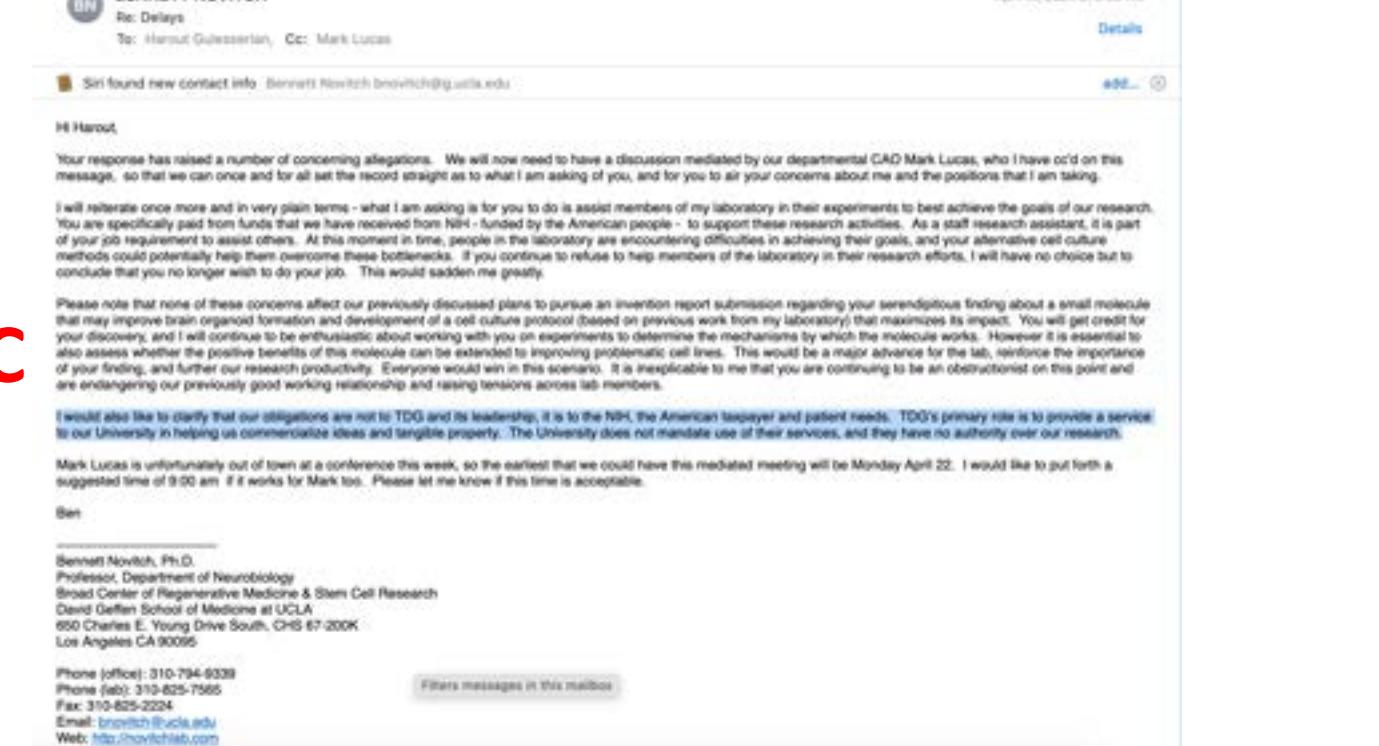
This all traces back to October 26, 2023, when I suspected that fraud was about to occur in the lab (SEE attachment A then attachment B). Cendi Ling attempted to name-drop my discovery during her practice oral exam, even before any safeguarding of UCLA-owned intellectual property and prior to my receiving any academic recognition for my work.

As Harout Gulessarian, I believe I deserve at least this acknowledgment for my hard work and the time I've invested in advancing science through the discovery of a novel use of a molecule and invention/creation of a Feeder-Free Brain organoid protocol that is rightfully owned by UCLA not NIH as Supervisor Novitch so wrongfully lied about (See attachment C).

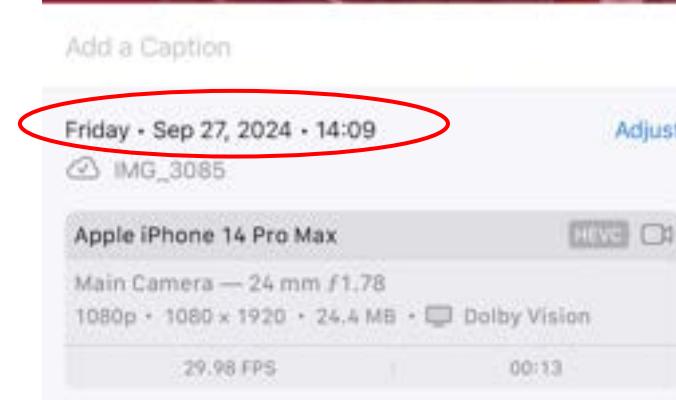
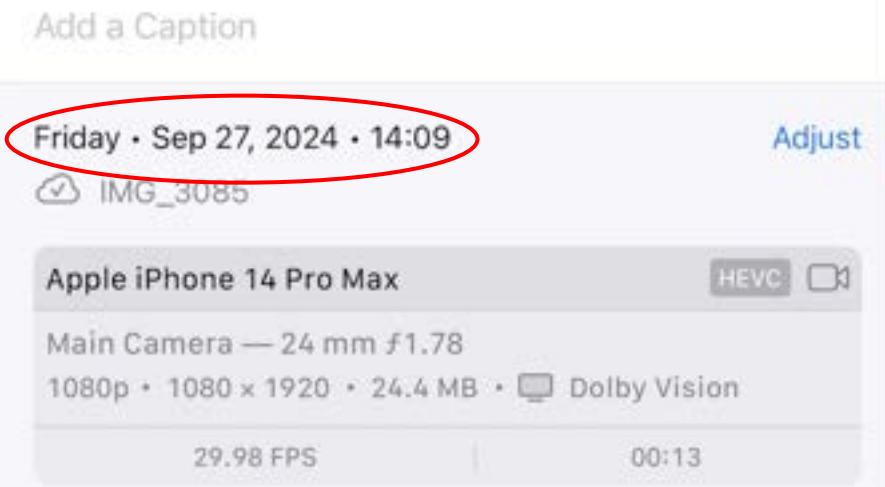
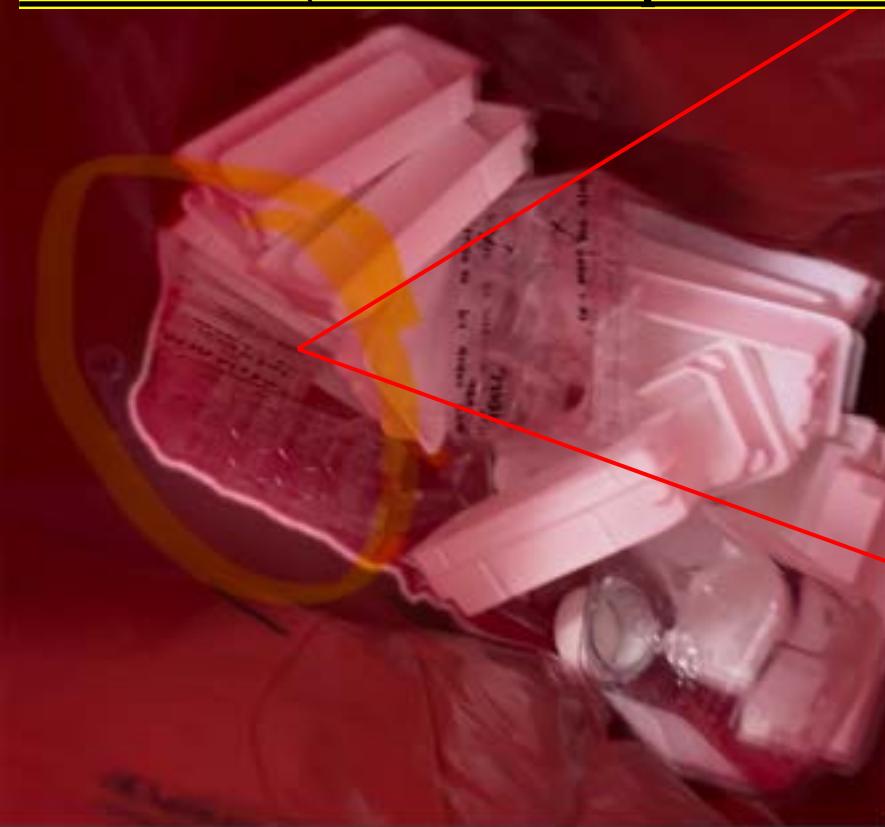
## Full circle back to the original issue and problem

**A**   
CENDI LING  
Invitation to my oral qualifying exam practice talk  
To: BENNETT NOVITCH, Samantha Butler, Keith Phan, Kim Sangmok (BOL), ERIC HEINRICHES, Jessie Butch & 15 more  
Inbox - iCloud - October 26, 2023 at 9:07 AM [Details](#)  
  
Hi everyone,  
  
I will be having my oral qualifying exam presentation early in December and will give a practice talk on Nov 27 at 1pm. I would really appreciate your feedback if you can make it! It will be in the conference room where we have lab meetings.  
Thank you in advance!  
  
Best,  
Cendi

**B**   
Harout Gulessarian  
Non-Disclosure Agreement (NDA) for SB580865/organoid protocol  
To: Bennett Novitch  
Inbox - iCloud - November 26, 2023 at 9:16 PM [Details](#)  
  
I am generating a non-Disclosure-Agreement such that my findings will not be used disclosed or published without my consent on any platform or institutional level.  
  
My finding is my finding not Cendi Lings. I deserve all credit for this finding of SB580865. No scientific data has been shown on this molecules use at the state we use it at ... I Harout Gulessarian found this and also invented the protocol in question.

**C**   
BENNETT NOVITCH  
Re: Delays  
To: Harout Gulessarian, Cc: Mark Lucas  
April 15, 2024 at 9:08 AM [Details](#)  
  
Siri found new contact info: Bennett Novitch bnovitch@ucla.edu [add...](#) [\(i\)](#)  
  
Hi Harout,  
  
Your response has raised a number of concerning allegations. We will now need to have a discussion mediated by our departmental CAD 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): 310-794-6339  
Phone (lab): 310-825-7565  
Fax: 310-825-2224  
Email: [bnovitch@ucla.edu](mailto:bnovitch@ucla.edu)  
Web: <http://bnovitchlab.com>

## Evidence A (New evidence provided to UCLA)



From September 23rd to September 27th, the same plates were discarded after the organoids were transferred to petri dishes. Notably, the day the plates were thrown away coincided with the day the organoids were being fixed using the solutions shown in the previous image, marked with the #1-8 index. It is important to note that organoids must be transferred to a petri dish **within 18 days** of starting the experiment, raising suspicions about potential fabrication of the data.

## Evidence A (New evidence provided to UCLA)

### Overview of Tissue Culture Schedule

This information demonstrates that Butler lab members did not frequently visit the human tissue culture (TC) until recently, when Supervisor Ben Novitch sent Nilou (rotation student) to work with me on the HNMP protocol he provided on October 27, 2023. This collaboration illustrates the connection between the Butler lab and the Novitch lab, as the two principal investigators were attempting to co-mentor Nilou, the rotation student. This marked the first time they attempted to generate these types of organoids. Sandeep, Keith, Christian, and the two new trainees (Talin and Yahir) only began coming into the TC in the new year, after Nilou completed her rotation. During this time, Sandeep remarked that I would have to “give up [my] discovery eventually” and that I would need to “negotiate with Ben” regarding what receive in return.

### 2023 TC schedule: August 2023 - December 2023



## **Evidence A (New evidence provided to UCLA)**

## **LEGEND**

## ■ Cryostat/qPCR

## ■ Human Tissue Culture

#### ■ LSM (Microscope)

**2024 TC schedule: January 2024 – April 2024**

2024

S	M	T	W	TH	F	S	S
31	1	2	3	4	5	6	
New Year	New Year	Candid cryo	Bethie - LS	Bethie - LS	Candi LSN	Candi LSN	
		Diana	Bethie - LS	Hg	-	Natalie - LS	
		Diana		Jessie TC	Diana		
				Christian	Hg Nmbr		
				Jessie LS			
7	8	9	10	11	12	13	
	Diana LSN	Sangoma	Angel	Hg	Sangoma	Hg Name	
	Hg/HM cryo	Hg	Ivan	Hg/LN cryo	Candi & Re		
	Aurie	Bethie - LS	HG/EN cryo			Jessie TC	
	Diana	Candi	Hg	Candi and			
	Cynthia art	Jessie TC	Negan	Diana	Hg and I		
14	15	16	17	18	19	20	
	Martine LSN	ARTH (Hg)	Angel	Jessie TC	SHANAE		
	Diana TC	HG/EN LSN	EN cryo	Jessie LSN	Shane LSN		
		Candi	HG LSN	Christian	Hg		
		Jessie LSN	Eric Cryo				
		Hg Tr					
21	22	23	24	25	26	27	
	Hg	HG/EN LSN	Angel LSN	Jessie LSN	Candi LSN	Venice cryo	
		HG/MH,SH	HG Main T	Ivan TC	Hg	Candi	
	Diana	Negan	Sandwich/C	Jessie TC	Masha cryo		
	Aurie	Candi	Negan			SHANE LSN	
	Diana LSN	Jessie LSN	Negan Hg			Shane LSN	
	Venice cryo	Jessie TC	***				
28	29	30	31	1	2	3	
	Hg Name	Sangoma	ARTH (Hg)	First Day	Angel LSN	Hg	
	Diana	Candid LSN	PHASE 100%	Angel TC	Angel LSN	Angel TC	
	Yessica TC	Jessie viny	Jessie sin	Ivan cryo	Jessie LSN	Maria	
	Rebecca TC	Candi		Jessie LSN	Jessie LSN	Candi	
				Jessie viny	Angel TC	Jessie TC	
				Hg	Angel Cryo		
4	5	6	7	8	9	10	
	Angel LSN	Sangoma	ARTH (Hg)	Candi	Hg	Hg	
	Diana LSN	Angel TC	Angel LSN	Christian LSN	SHANE LSN	Maria	
	Diana	Candi	Candi	Lauren TM	Venice TC	Ivan	
	Hg	Jessie LSN	Christian TC	Christian LSN	RESCIA cryo	Rebecca TC	
			Angel TC	Angel TC	Rebecca TC		
			Christian LSN				

S	M	T	W	Th	F	S
28	29	30	31	1	2	3
Hg Human	Samsonoff	Math Ward	Hughes	First Day	Angel LHM	Hg
Diana	Christian LHM	Terriann Ward	Angie TC	Angie LHM	Angie TC	Diana
Veronica	Jessie vito	Jessie vito	Ivan cryost	Candi	Jessie LHM	Veronica
Nicole K	Candi		Jessie LHM	Jessie LHM	Candi	Jessie TC
			Hg	Angel Cryo		
4	5	6	7	8	9	10
Candi	Angel LHM	Sangmok	math (Hm)	Candi	Hg	Hg
Jessie LHM	Angel TC	Angel LHM	Angel TC	Veronica LHM	Jessie TC	Maria
Stacia	Candi	Candi	Loriann TC	Veronica TC	Candi	Veronica
Hg	Jessie LHM	Cristian LHM	Angel TC	Angel TC	Jessie TC	Candi
			****	****	****	
11	12	13	14	15	16	17
Hg	Sangmok	Math Ward	Valentino	Hg	Sangmok	Hg
	Candi	Candi	Sandee	David LHM	David	Emily vito
	Nicole	Candi LHM	Angel TC	Hg LHM	Hg	Jessie vito
	Hg	Candi vito	Angel TC	Angel TC	Jessie TC	Jessie LHM
		Jessie TC	Candi	Jessie vito	Jessie vito	
			****	****	****	
18	19	20	21	22	23	24
Hg/E	President	Hg	Hg	Hg	Hg	Candi
Diana	Emily - vito	Hg	Angel TC	Veronica	Loriann	Hg TC
Jessie vito	Hg	Heges	Jessie TC	Jessie TC	Mac (Carr)	Hg cryo
Candi	Angel LHM	Candi	Loriann TC	Veronica	Candi	Stacia
	Cristian LHM	Cristian TC	Emily - vito	Emily TC	Candi	
			****	****	****	
25	26	27	28	29	1	2
Hg	Hg/EM	Hg	Hg	Emily - vito	First Day	Hg LHM
Hg LHM	Angel TC	Emily - vito	Erik Cryost	EM	Emily - vito	Hg
	Sangmok	Hegies TC	Cristian TC	Jessie vito		
	Nicole	Sokko DHA	Emily TC	Jessie LHM	Emily vito	
	Cristian TC	Emily LHM	Hao (Carr)	Jessie TC	Hg	
			****	****	****	
3	4	5	6	7	8	9
Jessie TC	HG Head	Hg/HM	Sangmok	Hg	Candi	Quinta & Candi
	Candi LHM	Cryostat	Emily - vito	Jessie TC	Jessie TC	Candi
	Sangmok	Angel TC	Hughes TC	Emily TC	Sangmok	Cristian
	Angel TC	Candi	Maria TC	Candi vito	Emily - vito	
	Nicole TC	Maria Cryo	Emily TC	Hg	Candi	
			****	****	****	

S	M	T	W	TH	F	S
31	1	2	3	4	5	6
Easter Sat	Easter Mon	Candice LHM	Hg	Candi	ENg&G	Candi
Hg	Hg	Hakuna	Candi	Jessie TD	ENg&G	
Gandi LHM	Candi LHM	Hakuna	Charlene	Candi	Westica dia	
		Natalia	Candi	Ivan cryo	Maria	
		Hg Virus	Charlene	Candi	Candi	
		***	Charlene	Jessie TD	***	
7	8	9	10	11	12	13
Candi	Charlene	HG cryo	Candi LHM	Angel LHM	Hg LHM&G	Hg&EN
Charlene	Isaac	HG	Charlene	Charlene	Charlene	Jessie vir
Hg&EN	Rebecca	Maria (Cr)	Isaac	Jessie TD	Candi	Candi
Jessie TD		Charlene	Candi	Hg Isabella	Charlene cr	Jessie vir
		Jessie (gP)		Jessie TD	Candi (Isas)	
		***				
14	15	16	17	18	19	20
Tax Day	Sabine - d	Charlene cr	Charlene	Westica 700		Jessie TD
HG&EN	Charlene	Angel LHM	Westica 700	Charlene L		
Sabine & G	Westica 700	Hg&EN	Charlene L	Sabine - Cr		
Hg	Candi	Charlene	Westica 700	Blanca		
Candi	Hg	Candi	Candi	Candi		
	***	***	***			
21	22	23	24	25	26	27
Sangmoek	Charlene cr	Angel LHM	Zamulho L	Angel LHM	Amy (Car)	
Isaac	Charlene	Charlene	Jessie LHM	Jessie - Cr	Jessie TD	
Orange LHM	Westica 700	Charlene cr	Zamulho L	Jessie TD		
Charlene	Jessie TD	Sabine - d	Sabine - Cr	Angel TD		
Jessie TD	Jessie TD	Gandi LHM	Hg&EN TD	Charlene L		
		***	***	***		
28	29	30	1	2	3	4
Candi cry	Angel TD	Cryostat -	First Day d	LHM&G	Bangmoo	Candi
Sabine&G		Charlene	Angel TD	Candi	Jessie	Jessie TD
		Ivan cryo	Cryostat -	Westica cry	Westica cry	
		Sabine&G	Candi LHM	Maria - Cr	Maria - Cr	
			Westica	Jessie TD		
			***			
5	6	7	8	9	10	11
Charlene	Sangmoek	Charlene & G	Angel LHM	Jessie LHM	Diana	
Jessie - Cr		Charlene	Candi LHM	Westica cry	Bangmoo	
Candi		Isaac	Charlene cr	Jessie LHM	Candi	
Charlene		Westica cry	Angel TD	Candi	Charlene	
Charlene		Hg&EN TD	Hg&EN TD	Charlene LHM	Activita	
		Westica	Westica	***		

## **Evidence A (New evidence provided to UCLA)**

## **2024 TC schedule: January 2024 – April 2024**

2024



## LEGEND

- Cryostat/qPCR
- Human Tissue Culture
- LSM (Microscope)

# **Section V.**

## **Full Circle to Original Red Flags and How They Played Out**

**Evidence A (New evidence provided to UCLA)**

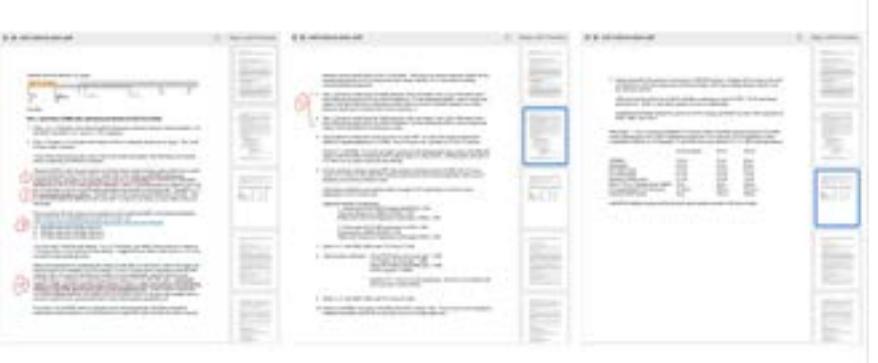
Here is the origin of this new NMP protocol that came after my discovery presented by Ben Novitch. These are the notes that were sent to me by the rotation student Nilou. There is very strong evidence suggesting that my discovery has been misappropriated by the Butler lab. Because I did not disclose the usages of the molecule and my protocol, Novitch/Butler redirected their efforts to claiming rights under Butler's laboratory instead. Not surprisingly, her laboratory is now working with this molecule after receiving a \$2 million grant in which (I suspect) my molecule was disclosed.



November 2023

**Evidence A (New evidence provided to UCLA)**

Continuation of the protocol that Ben sent about NMP's after my discovery



November 2023

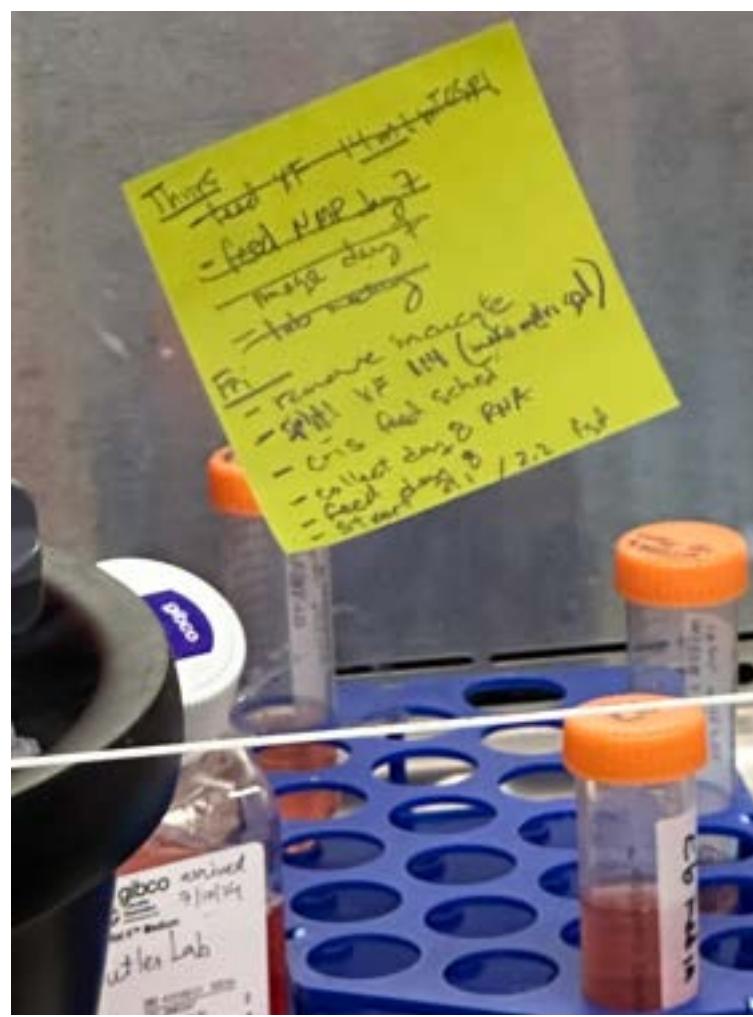
**Evidence A (New evidence provided to UCLA)**

Continuation of the protocol that Ben sent about NMP's after my discovery



# Full Circle #1 without limitation

Connecting back to the previous slides, I noted that at the end of October 2023 and the start of November 2023, Nilou was assigned to work on HNMPs under my supervision—an area currently being explored by the Butler lab. This protocol was sent to me by Supervisor Ben Novitch, as I did not share my molecule or protocol for generating feeder-free cerebral organoids. In response, Supervisor Novitch attempted an alternative approach to claim rights to the intellectual property.



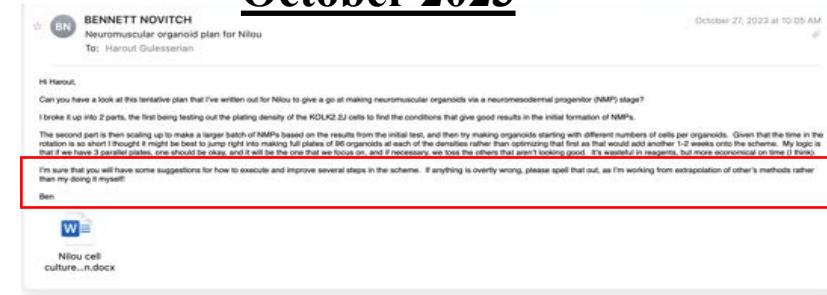
September 2024

During an in-person encounter with Sandeep Gupta late February early March I was told by Sandeep that I would have to give up the IP eventually and that I should try to negotiate with Supervisor Novitch what I can get in return. Fast forward to September 5, 2024, the in-person interaction with Cristian Rodriguez confirmed that it was Gupta who was interested in using my molecule for their protocol as I received verbal confirmation that SB5 was being used and that their efforts have been recent, following my discovery of the use of the molecule. Additionally, a new interim trainee in the Butler lab, Talin, was overheard discussing “scientific sabotage occurring in the lab” on September 18, 2024. This remark visibly made Rodriguez uncomfortable, prompting him to downplay the statement. In the broader context, I am the one currently facing scientific sabotage in the Supervisor Novitch lab.

## **Evidence A (New evidence provided to UCLA)**

October 2023

In reviewing recent developments, it is critical to note that at the end of October and early November 2023, Nilou was assigned to work on HNMPs under my supervision, linked to ongoing research in the Butler lab. The protocol I received from Supervisor Ben Novitch did not include my molecule for generating feeder-free cerebral organoids, prompting Supervisor Novitch to pursue alternative claims to the intellectual property. In a conversation with Sandeep Gupta in early February 2024, I was advised to negotiate the relinquishment of my IP as "only PI's get a cut" in the hallway of CHS 66-200k. On September 5, 2024, Cristian Rodriguez confirmed Gupta's interest in using my molecule, specifically SB5, for their protocol, which followed my discovery. Additionally, on September 18, 2024, a trainee in the Butler lab overheard discussing "scientific sabotage" visibly unsettled Rodriguez, who downplayed the remark. Notably, UCLA's interests were never considered by the involved parties, emphasizing the ongoing challenges I face regarding scientific sabotage within the Novitch lab.



© cell culture plan.p

October 2023

densities into the unused wells of the 12-well plate. These are to be used as reference points for the immunostaining that we'll be doing at the end to assess whether we've succeeded in making immunoprecipitated preparations.

- 5** [Step 12] Remove media from the SPC induction wells and replace with 1 ml of 70% media with 3 µM CHER and 40 ng/ml PGF2 (no ROCK inhibitor). For the maintained hiPSC, remove media and replace with fresh StemFlex maintenance media (unless you don't normally change it on a daily basis) in which case it would be fine to leave until day -1.

- [Day 4] Remove media from the NMP induction wells and replace with 1 ml of NBR media with 3  $\mu$ M CER and 40 ng/ml POF2 (the ROCK inhibitor). For the maintained hiPSC, remove media and replace with fresh Stancher maintenance media.
- [Day 6] Remove media from wells and tissue 1x with PBS. Fix cells with freshly prepared and cooled 4% paraformaldehyde (PFA) in PBS for 15 min at room temperature. Wash 3 times with PBS.

Wash 2x 5' with PBS. If you are not able to proceed with staining right away, remove the PBS at step 10 with fresh PBS containing 0.05% sodium azide as a preservative. Parafilm plate and store at -20°C.

6. Primary antibody staining- replace PBS with antibody blocking solution (1xPBS with 1% fetal serum, 0.1% Triton X-100, and 0.03% sodium azide) and let sit at room temperature while you are

Add primary antibodies and incubate either overnight at 4°C (preferred) or 2 hours at room temperature. Wash away excess antibody.

Temperature, °C; 0.1 mol per mole.

Suggested antibody combinations:  
1. Mouse anti-90192 (R&D Systems MAB2014) 1:200

Rabbit anti-Cdc2 (Cell Signaling Technology (2396), 1:300

8. Minas and Oct14 (BD Biosciences) 46 (2001) 1-500

Goat anti-Rabbit IgG (H&L) (AF-2000); 1:250  
Rabbit anti-Nanog (Cell Signaling Technology 4901); 1:500

7. Wash 3 x 5' with PBST (PBS with 0.1% Triton X-100)

#### **8. Add secondary antibodies : Alexa 488 Donkey anti-mouse IgG, 1:1000**

Anti-Donkey anti-Green IgG, 1:10000  
Alloxa 647 Donkey anti-Rabbit IgG, 1:10000

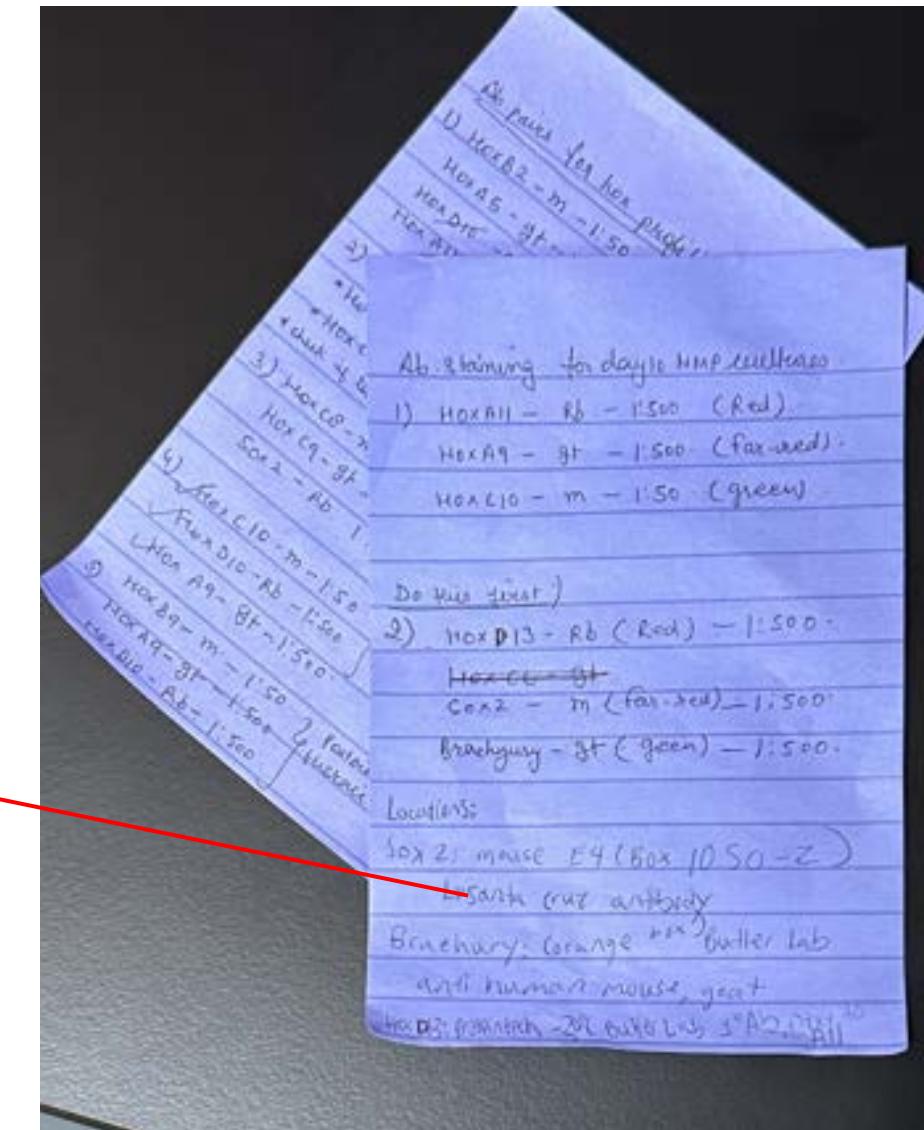
DADY (mg/ml) < 10000

Incubate for 1-2 hours at room temperature. We recommend cover plates when lid or put into a closed drawer.

3. Wash 3 x 1' with PBOC7 (PBO) with 0.1% Triton X-100

10. Remove with PBST and replace with PBS with 0.005% sodium azide. You can store in the refrigerator wrapped in parafilm and for several days, but heat to 37°C right away.

October 2024



## Evidence A (New evidence provided to UCLA)

## Full Circle #2 without limitation

September 2024

Upon returning to the lab on August 19th after a meeting with Supervisor Ben Novitch—another instance of his hostile and retaliatory behavior occurred in CHS 67-200k—I was instructed to work on the RETT syndrome lines for the first time. I was tasked with introducing GFP or mCherry reporters into the control and mutant lines, respectively.

Later in the month, I saw an individual who had previously threatened to steal from me in a video from UCLA, claiming they were developing novel discoveries in the lab. This was done in concert with co-conspirators and bad actors, who arguably put UCLA at risk regarding its own intellectual property. What is even more troubling is that, despite successfully getting their cell lines to work myself, Supervisor Novitch now completely restricts me from pursuing my own discovery and invention. What appears to be an act of retaliation displayed on the next slide, is now becoming a common ground for Supervisor Novitch as he continues to undermine my work as “you got lucky” and continues to attempt to get government grants with his consortium group by misleading the University, the public, and its very own employees.

This constitutes career sabotage, carried out with intent of heavy-duty retaliation. For instance, Supervisor Novitch verbally dismissed my work last week because it did not align with his protocol aimed at securing a grant, denying UCLA rightful credit, and potential royalties from my novel invention. This behavior is unacceptable, and this retaliation will not be tolerated further.

Feb 6th



Natella Baliaouri 5:58 AM

Harout

Please send out the protocol

Or else I will have to steal it somehow



## Evidence A (New evidence provided to UCLA)

September 2024

### Full Circle #2 without limitation

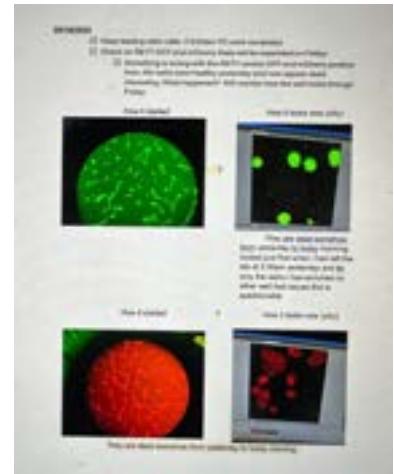
This form of retaliation/scientific sabotage is evident, as my cells have died on two separate occasions while others have taken over them. This issue is particularly concerning with the RETT syndrome cell lines, which I cared for and maintained in excellent condition. I am not present on weekends, and yet my cells suddenly die, specifically within the RETT syndrome lines. This is concerning because while I am the one who establishes the reporter lines, the lines themselves are being passed onto others to attempt to make organoids with my protocol again all while Ben is still trying to get me to waive my rights to the invention/discovery. This is all occurring at the same time Ben has Diana and Angel (these are the SRA's that work with Balliaouri "steal" commentor) working on organoids from these lines I generated, effectively trying to sabotage my efforts and preventing me from working on organoids as every time I near the start of organoid production my cell lines somehow end up dying the day prior.

It appears that Ben is intent on advancing a grant proposal that does not include my methodology as the consortium now tries to push for a different approach to incorporate others and dilute me out of my discovery. I believe this constitutes as direct retaliation and is another example of scientific sabotage.

## Further acts of Continuous Retaliation

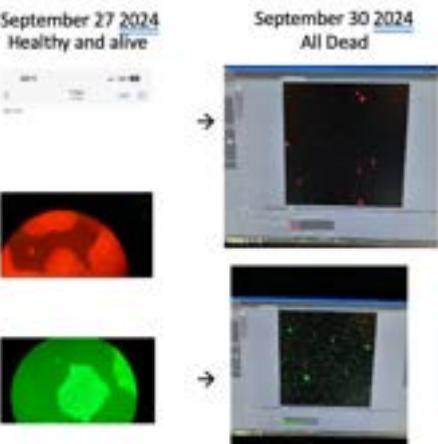
### Example 1 random cell death

9/16/2024-9/19/2024



### Example 2 suspicious cell death

9/27/2024- 9/30/2024



I am deeply concerned about recent events regarding my cell lines and research protocols. My cell lines have died twice in succession, and shortly thereafter, I discovered that my established protocol was used to create organoids, utilizing the same cell lines I developed. This group, which sent me a message indicating an intent to misappropriate my work, is now attempting to advance a grant application while obstructing UCLA and myself from securing the patent for this lucrative protocol, which I perceive as direct retaliation.

# Evidence A (New evidence provided to UCLA)

## Full Circle #2 without limitation

A) What is displayed here are my samples undergoing RNA sequencing after I pleaded with Ben for over six months to initiate the process. A significant red flag is that Ben has altered the project name to “Optimization of Drug Treatment on Early Stages of Organoid Formation,” deviating from the original title I provided: “ACOP Accelerated Cerebral Organoid Protocol.” This title was included in the draft manuscripts I submitted to UCLA TDG. This change highlights how the narrative surrounding the discovery has been manipulated, shifting from an accidental finding to a more favorable story as was mentioned by Supervisor Novitch on October 2<sup>nd</sup> 2023 (See 2 slides below).

**A**

UCLA Health System  
UCLA Technology Center for Genomics & Bioinformatics  
Service Request Form  
Postal address: 800 Charles E Young Drive South, CHS 39-1220  
Los Angeles, CA 90095-1700  
Phone: (310) 206-2860  
Before delivering your samples, please e-mail us the copy of the request form at [samples@uclahsc.edu](mailto:samples@uclahsc.edu).  
Also, please print a copy of the request form when you deliver your samples at CHS 39-1220.  
If you need your samples back, please return them to us within 2 weeks after you receive the data.  
All samples will be automatically DISCARDED 2 weeks after the data delivery.

REQUESTOR INFORMATION		
Request Identifier (use PI w/last)	Request Name	Email: <a href="mailto:asandhu@ucla.edu">asandhu@ucla.edu</a>
Organization/Department: Department of Neurology/TS2024	Dept. Code: 1100	
Union Address: 800 Charles E Young Dr. S., Los Angeles		
City: Los Angeles	State: CA	Zip Code: 90095
Contact Person/who delivery samples: Hanish Subbarao	Phone (Required): (310) 206-8173	Email: <a href="mailto:hsubbarao@ucla.edu">hsubbarao@ucla.edu</a>
Is PI a 2022 Member? <input type="checkbox"/>	No	

RELEASER INFORMATION	
Different Releasers PROTECTED: Include any applicable Project Code and/or Service Code Not Recommended (PI/Co): <a href="mailto:asandhu@ucla.edu">asandhu@ucla.edu</a> (98%) and <a href="mailto:hsubbarao@ucla.edu">hsubbarao@ucla.edu</a> (98%)	Fwd Manager Name: Bri Polar <a href="mailto:bri.polar@mednet.ucla.edu">bri.polar@mednet.ucla.edu</a>
Estimated Releasers PROTECTED: (will be created after submitting the request form) PI: 0	Fwd: 0

EXPERIMENTAL INFORMATION	
Date of Request: 10/03/24	Project Name: Optimization of drug treatment on early stages of organoid formation
Project Information: Samples are a 1:1 mixture of neurons to drug treated organoids collected at different time points (0, 1, 2, 3, 4, 5, 6, day 10). 36 samples in total.	
SAMPLE SUBMITTED: Within One Month	

**B**

ELUKARYOTIC RNA ANALYSES  
Page 3 of 41

Sample	RIN <sup>a</sup>	Conc. (ng/ <sup>b</sup> µl)	Sample Description	Notes/Actions
S1	10.0	1.00	Unknown	Sample concentration: Average functional range for RIN and the sample
S2	9.0	0.01	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S3	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S4	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S5	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S6	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S7	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S8	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S9	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S10	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S11	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S12	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S13	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S14	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S15	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S16	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S17	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S18	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S19	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S20	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S21	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S22	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S23	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S24	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S25	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S26	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S27	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S28	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S29	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S30	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S31	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S32	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S33	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S34	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S35	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample
S36	9.0	0.00	UCLP 10/10 Powder Trace (2/24-4/2)	Sample concentration: Functional range for RIN and the sample

**This brings us full circle from the email I sent in March to Supervisor Ben Novitch, in which I mentioned the possibility of sabotage and fraud regarding Dr. Novitch and the direct retaliation I was/am facing for whistleblowing.**

**Now, in September 2024, it is evident that sabotage, retaliation and attempts to coverup are actively at play.**



Harout Gulessserian

Re: Protocol and Dup15q organoids  
To: BENNETT NOVITCH

Inbox – iCloud: March 18, 2024 at 3:42 AM

Hi Ben,

First, let me thank you for the valuable info regarding starting to format the protocol in a manner that gets it ready for publication some day; I believe it's a great idea and I deeply appreciate all your valuable help. In fact, I can't wait to get that part of the project underway.

Second, I just would like to clarify that there seemingly is a distinction (with an imaginable difference) as to both form and substance regarding preparing and drafting the: (1) protocol documentation for academic publication as you brilliantly proposed; versus, (2) preparing the protocol documentation as to filing merely of a non-public skeletal "pre-patent" "provisional" application so as to comply with first-to-file rules with an early time-stamp and begin securing the intellectual property from intermeddling/misappropriation; and, then finally (3) as opposed to preparing the full blown rigorously scrutinized protocol documents with all the detailed data per your exact liking for drafting and prosecuting of the final "non-provisional" publicly published patent application and/or any other intellectual property interest protections that may exist under the Federal and State laws respectively.

Conceivably, in part because of UCLA best practices (I suspect these best practices are driven by the patent and intellectual property laws, whatever they may be, as I don't even purport to know anything about these laws, but TDG is extremely knowledgeable in this area and extremely helpful with wonderful guidance (see attached university links at the end of the email)), it appears it is of ultimate legal importance to first quickly complete and conclude a minimum threshold skeletal filing option for the provisional/pre-patent intellectual property aspect of the project so as to essentially "race" towards the United States Patent Office (hereinafter "USPTO") time stamp from USPTO in an effort to protect the IP. Then, once this pre-patent time stamp is attained, subsequently the laws seemingly give us one year of time so as to comfortably gather all of the data you feel is needed, to do more deep dive research which may include (without limits) more people, including drafting any other documentation by others as you feel is of value as UCLA/TDG presumably will use a functionally more detailed substantive documentary form for the final non-provisional patent filing, as opposed to the primary provisional filing; thus, this two-step flexibility option invariably assists in securing the IP while encouraging our research supplementation throughout the year allowing even greater degrees of know how towards the subject matter underlying the goal of an ultimate final filing via a "non-provisional patent application" and perhaps contemporaneously publishing an academic publication via one or more of the "Nature Protocols" and "Star Protocols" which you proposed underscoring "Nature Methods."

This option effectively presents a win-win scenario which in part protects the IP while giving the flexibility to gather data and add additional publication value more fully.

On the flip side, if a provisional or "pre-patent" filing is NOT done, then this would likely constitute an act putting in very high risk and in extreme jeopardy: (a) my personal inventor credit, your inventor/PI credit, and UCLA's assigned interest before the USPTO respectively (evidently, this is not only a large foreseeable monetary value for UCLA and our lab, but also a perpetual academic value as to my career, our lab, and also particularly as to yourself as a world leading global PI on this subject matter because it is likely USPTO filings tend to be looked at favorably by both commercial enterprise and academia respectively).

Third, I know it's not a favorite topic of discussion, but given I remain exposed to nearly half a year of non-inclusive/discriminatory activities by lab members, sadly it is foreseeable that, if there is any malice by others towards me with intent towards precluding the filing of a pre-patent/provisional skeletal application of my discovery (or other acts thwarting TDGs ability to timely file a pre-patent/pre-release (such as potential willful infringement with anticipation to distribute an intellectual property work [such as my protocol] prepared for commercial distribution, by intentionally availing the trade secrets of my protocol to the public as opposed to only availing before the USPTO until a provisional filing can be had). Therefore, whether due to sabotage or sheer neglect by ongoing non-inclusive, discriminatory and/or retaliatory co-lab members, or otherwise, it becomes obvious that we cannot 100 percent exclude a risk of unlawful intermeddling/misappropriating, fraud or other intentional malfeasance to thwart a pre-patent filing; if for no other reason, that I essentially blew-the-whistle on discrimination and overt threats of intermeddling/misappropriation of my discovery/protocol/IP by co-lab member(s) to you.

## Evidence A (New evidence provided to UCLA)

### Full Circle #2 without limitation continued



Harout Gulessarian

Re: Recap

To: BENNETT NOVITCH

April 11, 2024 at 9:07 AM

Hi Ben,

I'd like to bring up a noteworthy item that may shed some light on your question(s). Per the ACOP draft manuscript which I drafted and TDG forwarded to you, an important feature that I created for the timeline of the protocol which I ultimately forwarded to the Office of Chief Intellectual Property Officer of UCLA @ TDG is that the qPCR results from Days 0, 1, 3, 9, 18, & 35 organoids: No treatment v 2uM SB590885<sup>®</sup> were results from the same RNA that was used for the tapingstation QC analysis for the sequencing data, so consequently the instant RNA at issue referenced by Lilly in her email to us from yesterday is the same RNA as indicated in the draft manuscript which I submitted to TDG after my discovery.

That being said this may shed light on your question as to the sample's questions below:

With the samples, what is the nature of replication for the samples at each time point? Are these:

1. Same batch, replicate samples?
2. Samples from different batches?

So, consequently the instant RNA samples in question are the same RNA samples from my draft manuscript which you received from TDG and therefore you can easily see the framework of the protocol in action.

I would love to further discuss the full details with you in a meeting tomorrow morning some time or in the afternoon if need be. It has been 7 days since you agreed to sign off on the TDG pre-patent provisional bare bones application so as to preserve the IP.

Another noteworthy matter is that we likely should inform TDG ASAP if we changed the title of the project. Per the draft manuscript, I had originally named the title of my draft manuscript: "Accelerated Cerebral Organoid Protocol (ACOP)." If you changed the name to an alternate term called "Optimization of drug treatment on early stages of organoid formation" we should definitely reach out to TDG and inform them of the change.

Speaking of TDG, I am wondering whether you figured out a timeline for us to sit down and wrap up the document for TDG to go forward and file the barebones pre-patent provisional timestamp with USPTO so we can protect the IP [I am incorporating by reference and applying as if my email was here dated 3/18/2024 @ 3:52am titled "Protocol and Dup15q organoids", and another 4/2/2024 1:34pm "Fw: Bio-Techne RE: PO# 14300000051403 (Case #01879889)"] and then afterwards begin circulating the Protocol among UCLA Labs so we can gather the 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

[See More from Harout Gulessarian](#)

## Evidence A (New evidence provided to UCLA)

### Full Circle #3 without limitation

**Predicate example of continuous and ongoing systemic issue to Misrepresent the facts.** Evidently the truth is not suitable for Supervisor Novitch when we are obligated to say the true narrative of the story for research integrity purposes.

Even though my discovery was a complete accident in the lab and I disclosed it very early to Ben, Ben tried to mislead me by altering the narrative. Please speak with CIPO @ TDG there is apparent value when the discovery is an accidental discovery. Very early on two days after disclosing the discovery to Supervisor Bennett Novitch, there were attempts by Novitch to use fabricated narratives rather than the actual story see last paragraph in the email below.

A FULL CIRCLE back to the original intent of Supervisor Ben Novitch which was stated openly on October 2<sup>nd</sup> 2024 three days after initial disclosure of the discovery to Supervisor Ben Novitch.

 BENNETT NOVITCH  
Re: SB  
To: Hanout Gulesserian

October 2, 2023 at 3:08 PM

Getting back to the idea about publishing the protocol, if this pans out, and the effects are reproducible and applicable to other cell lines, there will be a few things to assess if we wanted to publish. These include:

1. Are the effects of SB-590885 related to B-Raf signaling, or something else? This would entail testing other inhibitors of B-Raf, as well as downstream effectors of B-Raf including MEK (via MEK/ERK inhibitors like PD98059 and PD0325901), or maybe something upstream like FGF receptor inhibitors like PD-173074. There was a paper that came out in 2022 arguing that treatment of feeder-free hPSC with PD-173074 can allow feeder-free cells to make organoids ([https://www.cell.com/science/pdf/S2589-0042\(22\)01412-2.pdf](https://www.cell.com/science/pdf/S2589-0042(22)01412-2.pdf)). But all of the prior experiments have focused on adding inhibitors to the undifferentiated hPSC, not during the organoid formation steps.

2. What effects are seen in organoids treated with nothing, SB-590885, and possibly other inhibitors (like SB-431542)? This would involve collecting organoids at different time points after drug additions (1 day, 3 days, 9 days, 18 days) for protein extracts and doing western blots for signs of different pathway activations (i.e pMEK1/2 as a readout of B-Raf activity, pERK1/2 for activation of MAPK signaling, pSMAD1/5/8 for BMP signaling, pSMAD2/3 for TGFbeta signaling, etc). We could also collect cells for RNA-Seq to identify downstream genes and molecular pathways that are changing. Single cell-seq also possible but a much more expensive route.

I would not engage on 1 except to see about how SB-590885 compares to SB-431542, but for 2, you might want to think about collecting some organoids at different time points for both RNA and protein collection. One possibility might be to use a kit like this one: <https://www.qiagen.com/us/products/discovery-and-translational-research/dna-rna-purification/multianalyte-and-virus/allprep-dnarnaprotein-mini-kit> which would allow collection of a common sample which can be fractionated into DNA, RNA, and protein for downstream analysis. I've never actually used this kit to know how well it works, but I presume it's not so different from the other methods that we use. This could also be done as parallel samples prepared for RNA collection as we normally do and protein either by adding some protein extraction buffer to the cells or snap freezing and storing at -80°C for later processing.

Probably we should wait until we see how well these methods reproduce, but happy to talk about laying out some of the analysis above.

The one factor I'm not yet sure of is how to introduce the use of SB-590885. Calling it a mistake does not add confidence, and it would be better to come up with some rationale based on other experiments like the idea that suppression of FGF-MEK signaling helps with organoids. This may take some crafting of a suitable narrative.

# Evidence A (New evidence provided to UCLA)

## Full Circle #3 without limitation

This brings us back to questioning the ethical and moral candor of Supervisor Ben Novitch, Supervisor Samantha Butler, Supervisor Mark Lucas, the NIMH Consortium, the Neurobiology Department collectively at UCLA, along with numerous members from the Butler/Novitch labs.

From: Found In Sent / Cloud Mailbox  
To: Harout Gulessarian  
Subject: Re: Delays  
Cc:  
Bennett Novitch  
Date: April 15, 2024 at 2:26 AM

Hi Ben,

Once again, I am objecting and reserving all rights and making no waivers, period. Furthermore, regarding your statements as to how you view "our methods as the collective wisdom and property of the lab" is seemingly irrelevant and insidious. Moreover, let me remind you that my discovery on 09/11/2023 was a complete accident. In as much as my accidental discovery (and my declaratory "creator"/"inventor" credit under Federal law) is now all of a sudden being dubbed a collective lab effort according to you, arguably this defies federal, state, and university policy for many reasons, but also because you are not designated as the arbiter of law and fact with this particular decision-making process.

It is instead arguably TDG, UCLA patent counsel, CIPO, and the President who determine and opine these specific intellectual property decisions as to who is dubbed a "creator"/"inventor". Had the data been coming out unfavorable regarding my accidental scientific discovery, it would seemingly be used by you to my detriment. This accidental discovery by me is by no means a collective effort, rather an employee working 7 days a week while also progressing the work of multiple grad students for two years (one who essentially seldom showed up, and another who essentially rarely stepped foot in the TC for the last 1.5 years, nor was in lab working on Saturday/Sunday (while I was there Saturdays and Sundays for no extra pay feeding their respective batches and insuring their respective projects go forward) in an ongoing hostile work environment, as I remain subjected to consisting of discriminatory, non-inclusive, retaliatory, individuals further trying to misappropriate my invention of the FF protocol and my discovery of usage of SB590885. Let me remind you that I have put you on notice about these matters for some time now. I also accepted your proposed outside mediation which you made zero attempts to schedule or execute, thus remaining with zero attempts to remedy the described retaliatory hostile workplace.

.....

I on the other hand, expressly and as fast as possible delivered the trade secret intellectual property in its totality, and even tirelessly and sleeplessly drafted a draft manuscript for CIPO/TDG per CIPO/TDG's express request. I am holding nothing back from UCLA, as you erroneously attempt to make it sound that I am holding back the IP information, which I did not whatsoever because I signed sealed and delivered all the IP in my possession and memory to TDG/CIPO/UCLA per CIPO/TDG requests to do so. I have done nothing other than work at breakneck speed to bring benefit to our lab, to UCLA, to NIH, and I delivered the requisite work product to UCLA because these are the rules/procedures of UCLA TDG. "Any person who (i) accepts employment with UCLA, or (ii) uses UCLA research facilities (e.g., visiting scientists or other non-UCLA employees), or (iii) receives gift, grant, or contract research funds through UCLA and/or the UC Regents, is required to promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the University authorized licensing office (UCLA TDG's Invention Report template is available at <http://tdg.ucla.edu/submit-invention-report>). I was told by University Officials that "You should disclose your invention to TDG before the work is published or publicly presented," and this is exactly what I did at breakneck speed working weekends and nights tirelessly to report my accidental discovery and invention/creation of the Feeder Free protocol. One of the main reasons I was in fact working tirelessly so hard to satisfy the UCLA policy is for the exact reason so that we can ASAP begin to use my invention in our lab because that is the process which I was essentially explained to from CIPO/TDG and I believe UCLA wants us to follow.

I mean I just have to say how shockingly insidious it is that after I did all of that work, prepared a draft manuscript, all those sleepless nights, hard work at the lab which are all required in order to bring legal use of this invention in our lab, now I am being accused by you and Hatella of hurting the lab by withholding my invention.

Furthermore, hypothetically there remains an argument to be made about the fact that I'm being accused by somebody, who in reality is the reason why we are not using my invention in the lab currently because they're withholding information (information which is in their exclusive possession - because this information still is not given to TDG, unlike my information which was given by me to TDG and is absolutely not in my exclusive possession) from the application is even more insidious and arguably hypothetically this could demonstrate a lack of good candor and a lack of strong moral character to some people, as it arguably demonstrates evidence of deceptive manipulated conduct and behavior with lack of any disregard for the good benefit of the lab or the hard working employees and especially a lack of regard towards the good benefit of UCLA and UCLA's trust that they have put in us to follow UCLA policies. In addition, this hypothetically demonstrates and exposes the malicious intent that you have had all along which as I have described above might very well be based on the fact that you arguably have a discriminatory intent towards my ethnic or national origin, as I have brought up to your attention in the past. At the very minimum even if you're not a hypothetical covert discriminator your conduct and practices thus far are a motivating factor as they have had a very real and express overt discriminatory impact on my rights, life, and interests to say the very least.

Nobody in the lab helped me do this accident and thus inadvertent discovery; instead I was told by people in lab that they will cut and cut out to steal the trade secret/IP which I accidentally discovered, so I was left with no choice but to try to protect not just my creator/inventor right, title, and interest but also UCLA/NIH's right, title, and interest if any. Therefore, I am not withholding information or providing in piecemeal and therefore I am not... "impeding other progress..." as you erroneously allege because I dutifully delivered all relevant intellectual property "information" as early as mid-January 2024 with my entire invention and all relevant details from my memory of the accidental discovery via writing a draft manuscript to TDG to UCLA/CIPO in conformity with UCLA policy, which you later received from UCLA TDG yourself per your own request to them. Instead, seemingly, as the true perpetrator hurting this lab, you had this intellectual property information in full and you have procrastinated, withheld and not supplied what is in your exclusive possession: the relevant MTA and Sponsor Information to TDG to move the process forward (Which MTA and Sponsor Information remains exclusively in your possession, not in my possession). Instead, you are now again subjecting me to make waiver of my rights, title, or interest which I shall not do and once again object it. I reserve all my rights, and remedies and I very humbly request once again to try to protect the IP and move the lab's interest, UCLA's interest, NIH's interest, your interest, my interest forward by giving the information that is only in your possession to CIPO/TDG so there will be no harm suffered to any stake holders by any delays and so CIPO/TDG can do their job, as the faster CIPO/TDG can do their job the faster our lab can benefit from the 1 year rule of the US patent office's provisional ban bones prepatent application. Very respectfully, I am not the one who is discriminatory, in fact I submit the facts indicate that you are, and therefore, please stop abusing your leadership role/authority in order to further retaliate, discriminate, harass me, and insidiously destroy my inventor credit by falsifying unfounded allegations that I am hurting the lab because I am following UCLA policy. UCLA has strict policies against the above-described malicious activities and I reserve all rights and make no waivers, period.

## **Evidence A (New evidence provided to UCLA)**

### **Full Circle #3 without limitation**

This situation has come full circle, highlighting noncompliance with university, state, and federal laws. I have reported instances of potential fraud and bullying in response to whistleblower retaliation for some time. Given the previous and current hard evidence presented, there should be sufficient grounds to warrant an investigation by the university.

Found in: Inbox - iCloud Mailbox

March 18, 2024 at 3:42 AM

**Harout Gulessarian**  
Re: Protocol and Dup15q organoids  
To: BENNETT NOVITCH

Hi Ben,

First, let me thank you for the valuable info regarding starting to format the protocol in a manner that gets it ready for publication some day; I believe it's a great idea and I deeply appreciate all your valuable help. In fact, I can't wait to get that part of the project underway.

Second, I just would like to clarify that there seemingly is a distinction (with an imaginable difference) as to both form and substance regarding preparing and drafting the: (1) protocol documentation for academic publication as you brilliantly proposed; versus, (2) preparing the protocol documentation as to filing merely of a non-public skeletal "pre-patent" "provisional" application so as to comply with first-to-file rules with an early time-stamp and begin securing the intellectual property from intermeddling/misappropriation; and, then finally (3) as opposed to preparing the full blown rigorously scrutinized protocol documents with all the detailed data per your exact liking for drafting and prosecuting of the final "non-provisional" publicly published patent application and/or any other intellectual property interest protections that may exist under the Federal and State laws respectively.

Conceivably, in part because of UCLA best practices (I suspect these best practices are driven by the patent and intellectual property laws, whatever they may be, as I don't even purport to know anything about these laws, but TDG is extremely knowledgeable in this area and extremely helpful with wonderful guidance (see attached university links at the end of the email)), it appears it is of ultimate legal importance to first quickly complete and conclude a minimum threshold skeletal filing option for the provisional/pre-patent/intellectual property aspect of the project so as to essentially "race" towards the United States Patent Office (hereinafter "USPTO") time stamp from USPTO in an effort to protect the IP. Then, once this pre-patent time stamp is attained, subsequently the laws seemingly give us one year of time so as to comfortably gather all of the data you feel is needed, to do more deep dive research which may include (without limits) more people, including drafting any other documentation by others as you feel is of value as UCLA/TDG presumably will use a functionally more detailed substantive documentary form for the final non-provisional patent filing, as opposed to the primary provisional filing; thus, this two-step flexibility option invariably assists in securing the IP while encouraging our research supplementation throughout the year allowing even greater degrees of know how towards the subject matter underlying the goal of an ultimate final filing via a "non-provisional patent application" and perhaps contemporaneously publishing an academic publication via one or more of the "Nature Protocols" and "Star Protocols" which you proposed underscoring "Nature Methods."

This option effectively presents a win-win scenario which in part protects the IP while giving the flexibility to gather data and add additional publication value more fully.

On the flip side, if a provisional or "pre-patent" filing is NOT done, then this would likely constitute an act putting in very high risk and in extreme jeopardy: (a) my personal inventor credit, your inventor/PI credit, and UCLA's assigned interest before the USPTO respectively (evidently, this is not only a large foreseeable monetary value for UCLA and our lab, but also a perpetual academic value as to my career, our lab, and also particularly as to yourself as a world leading global PI on this subject matter because it is likely USPTO filings tend to be looked at favorably by both commercial enterprise and academia respectively).

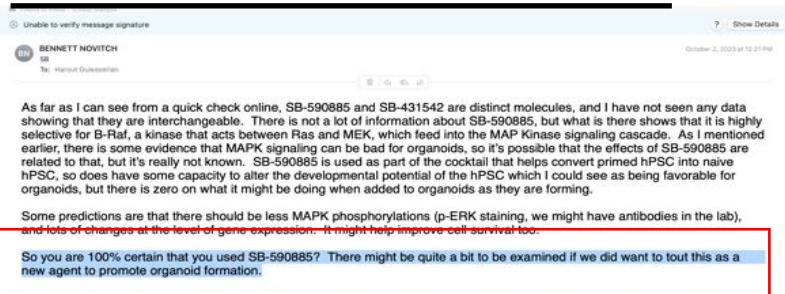
Third, I know it's not a favorite topic of discussion, but given I remain exposed to nearly half a year of non-inclusive/discriminatory activities by lab members, sadly it is foreseeable that, if there is any malice by others towards me with intent towards precluding the filing of a pre-patent/provisional skeletal application of my discovery (or other acts thwarting TDGs ability to timely file a pre-patent/pre-release (such as potential wilful infringement with anticipation to distribute an intellectual property work [such as my protocol] prepared for commercial distribution, by intentionally availing the trade secrets of my protocol to the public as opposed to only availing before the USPTO until a provisional filing can be had). Therefore, whether due to sabotage or sheer neglect by ongoing non-inclusive, discriminatory and/or retaliatory co-lab members, or otherwise, it becomes obvious that we cannot 100 percent exclude a risk of unlawful intermeddling/misappropriating, fraud or other intentional malfeasance to thwart a pre-patent filing; if for no other reason, that I essentially blew-the-whistle on discrimination and overt threats of intermeddling/misappropriation of my discovery/protocol/IP by co-lab member(s) to you.

Consequently, if any 3<sup>rd</sup> party intentionally or accidentally leaks my intellectual property (prior to a pre-patent skeletal barebones filing) to a nefarious 3<sup>rd</sup> party, then seemingly all proprietary discovered and learned details of the protocol and its specific intended commercial use would essentially become exposed (in 100% reproducible detail) to intermeddling third parties.

Sadly, as I told you numerous times in the past, I was put on notice (by folks even in our own lab) that individuals intend to misappropriate my discovery. Of course, subsequently after numerous verbal jabs by some folks in and about our lab, this whole madness ultimately culminated in brazen written notices to me of such intentions (which is sadly what it took for anyone to actually care about what I was saying for almost half a year).

## The fabrication of the narrative continues as Supervisor Novitch is intent lying to the University about the wrongdoings

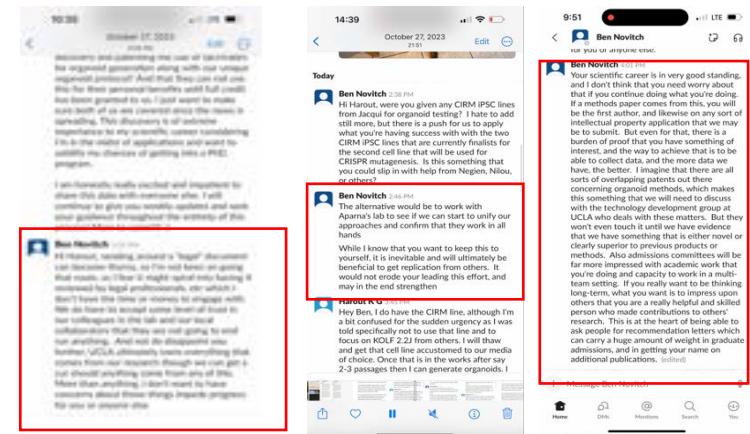
### Full Circle #4 without limitation



October 2<sup>nd</sup> 2023



October 26 2023

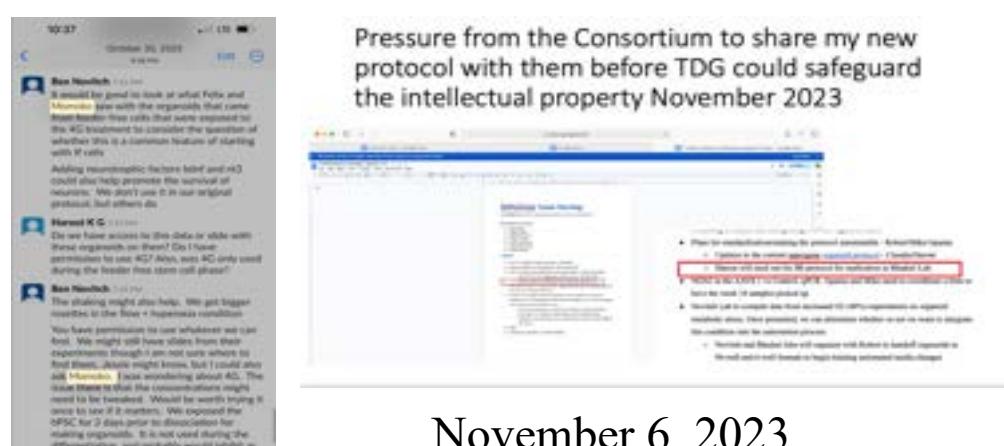


October 27 2023

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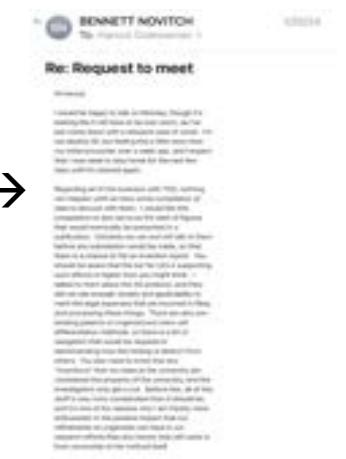


October 27 2023



November 6 2023

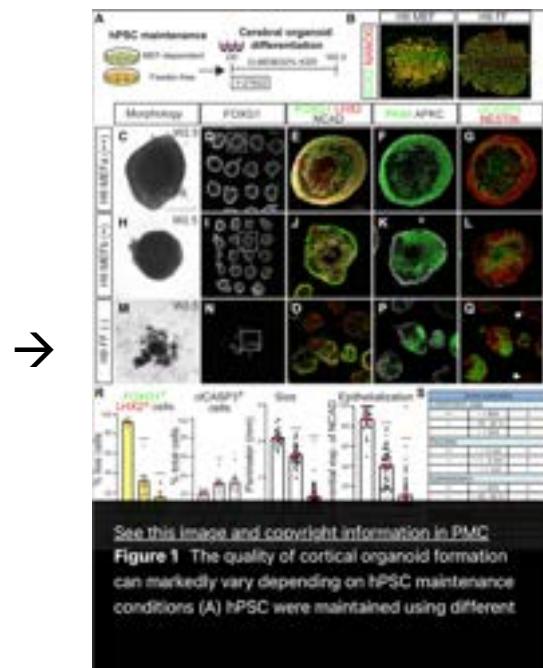
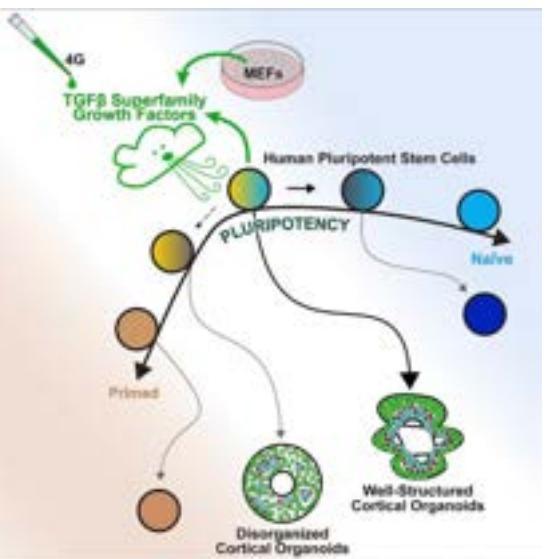
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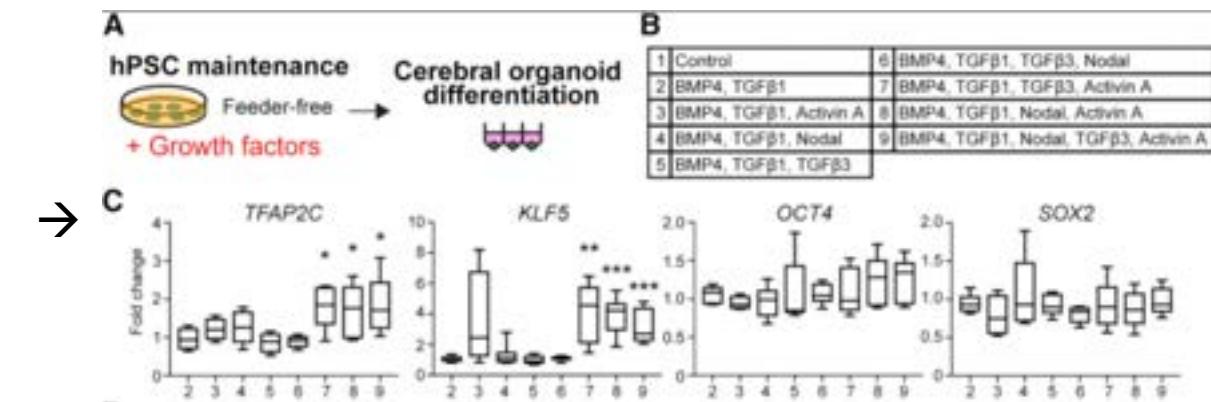
January 20 2024

## **Evidence A (New evidence provided to UCLA)**

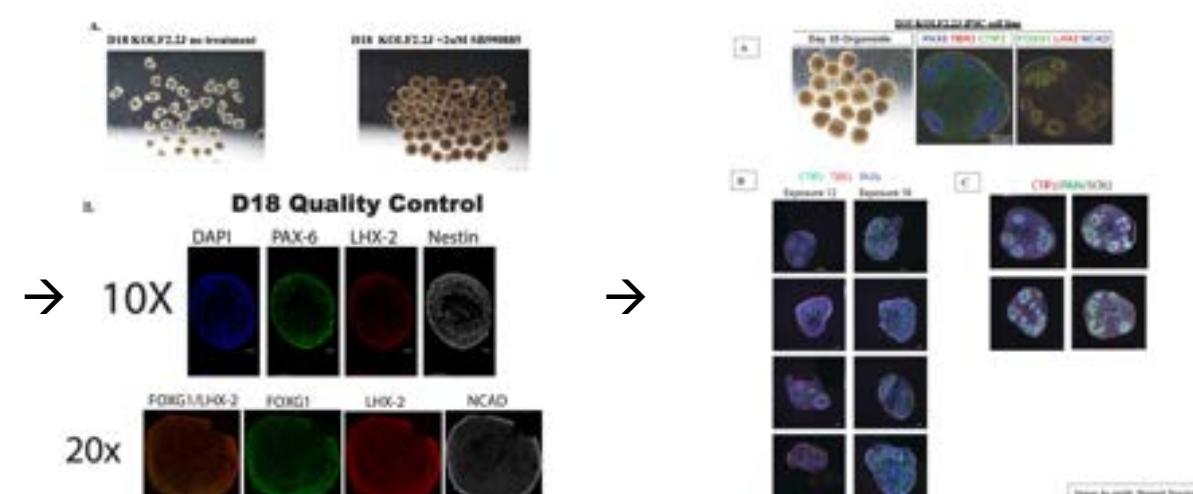
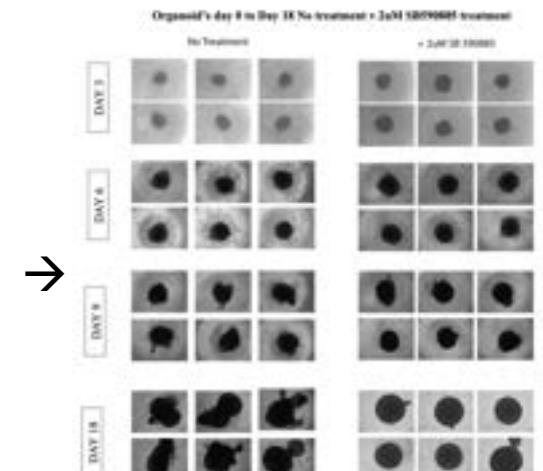
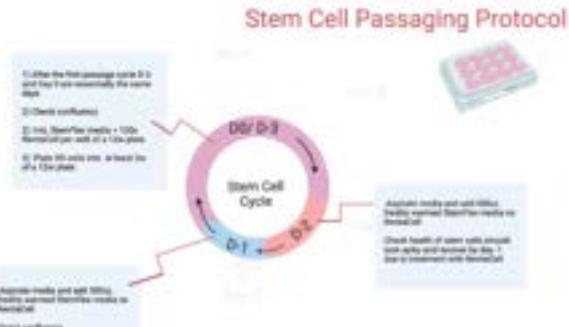
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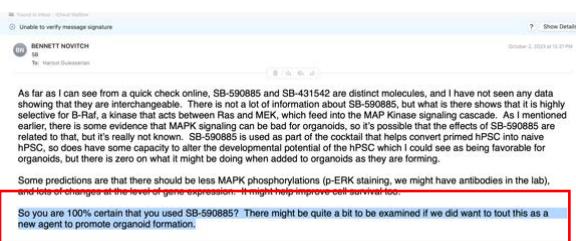
# **Full Circle #4 without limitation**



## Harout's Protocol



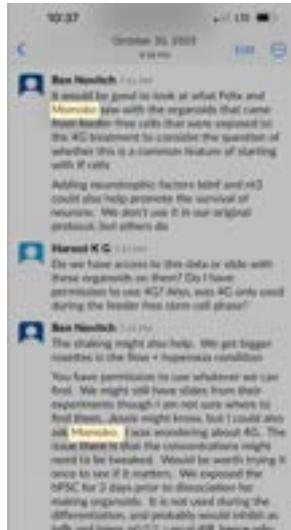
I showed the earlier slide to highlight that Supervisor Ben Novitch is attempting to alter the narrative once again. He's trying to combine the two protocols to present it as if it represents the collective knowledge of the lab, as he suggested in one email. In another, he instructed me to use the 4G protocol, despite knowing that my protocol was already working effectively without it. All of this seems aimed at making me waive my rights, ultimately putting both UCLA and myself at a disadvantage.



**First, after disclosing the invention to Ben, Ben attempted to alter the narrative of the accidental discovery, jeopardizing UCLA's chances of obtaining a USPTO patent. This constitutes research misconduct according to the ORI regulations that the university must adhere to.**



**Ben then attempted to have Cendi Ling claim the novel discovery during her practice oral exam on the 26th, despite her having no involvement in the invention or creation being presented. This prompted me to send myself an email on October 26, as I suspected that fraud was occurring.**



**On October 30th, Ben attempted to see if I could use a different protocol generated by his former student in combination with my own, even though my protocol was already working effectively and producing the desired results. Once again, I believe this was an effort by Ben to dilute my contributions and remove me from the equation.**

**UCLA Health System**  
**UCLA Technology Center for Genomics & Bioinformatics**  
**Service Request Form**

Parking and taxi: 1000 Charles E Young Drive South, OH 3H-113  
Los Angeles, CA 90095-1730  
Phone: (310) 267-1340

Before delivering your samples, please e-mail us the copy for the request form at [sequencing@mednet.ucla.edu](mailto:sequencing@mednet.ucla.edu).  
Also, please print a copy of the request form when you deliver your samples at CHS 3H-133.

If you need your samples back, please collect them from us within 2 weeks after you receive the data.  
All samples will be automatically DISCARDED 2 weeks after the data delivery.

REQUESTING INFORMATION		
Principal Investigator Name (PI last):	Harout Gulesserian	Email: harout.gulesserian@ucla.edu
Institution/Drop-Institution (Signature of Investigator/DG/DO):	Dish: Date: 10/30	
Street Address: 1000 Charles E Young Drive, EH 3H-113		
City: Los Angeles	State: CA	Zip Code: 90095
Contain Person who delivery samples: Harout Gulesserian	Phone (Wk/Off): 813-547-2637	Email: <a href="mailto:harout.gulesserian@ucla.edu">harout.gulesserian@ucla.edu</a>
To PI/DOE Number: N/A		

BILLING INFORMATION	
Internal User: 100-0103-01000, You can apply here Project Code: unclear Source Code: 7-0 Application Date: (7/10-4/04/04-IND-23323 (98%) and 4/05/04-IND-23333 (98%))	Project Manager Email: <a href="mailto:biophylo@mednet.ucla.edu">biophylo@mednet.ucla.edu</a>
External User: POF 100261863, Quota will be reused after submitting the request form. Yes/No: N/A	

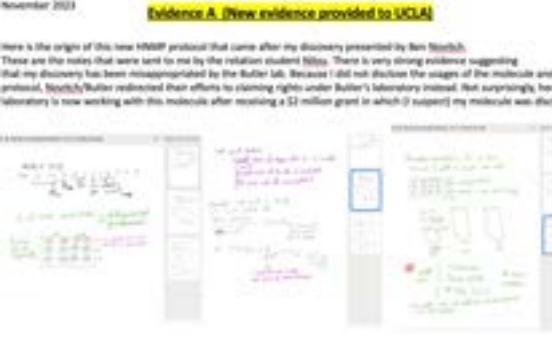
**EXPERIMENTAL INFORMATION**

Date of Request: 10/27/14  
Project Name: Combination of drug treatment as early stages of organoid formation  
Project Information: Treatment and/or induction regimen of drug-treated organoids collected at different time points (day 0, day 1, day 3, day 5, day 10, day 15, day 20, complete in notes)

**SAMPLE SUBMITTED (What You Give Us)**

**Here, Ben changed the title of the project, furthering his efforts to alter the narrative.**

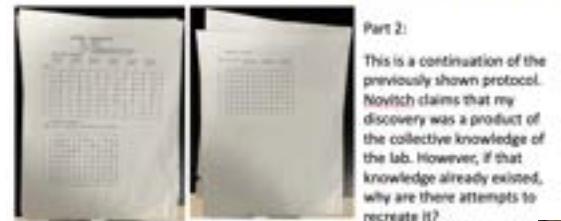
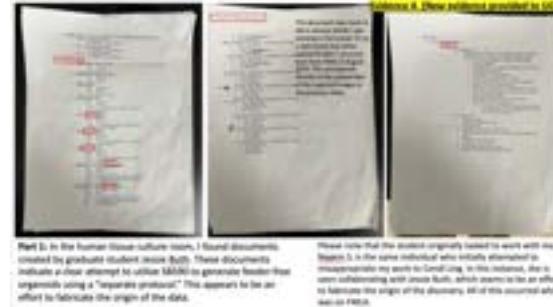
# Followed by many attempts to recreate my discovery and protocol in what is submitted to be attempts to continue deceptive misleading malpractices towards UCLA and its employees.



Example 1  
Nilou



Example 5 Angel & Diana  
(both work exclusively with Natella)



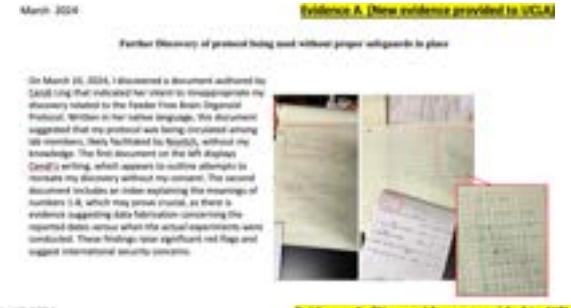
Example 2  
Jessie/ Negein



Example 3  
Natella



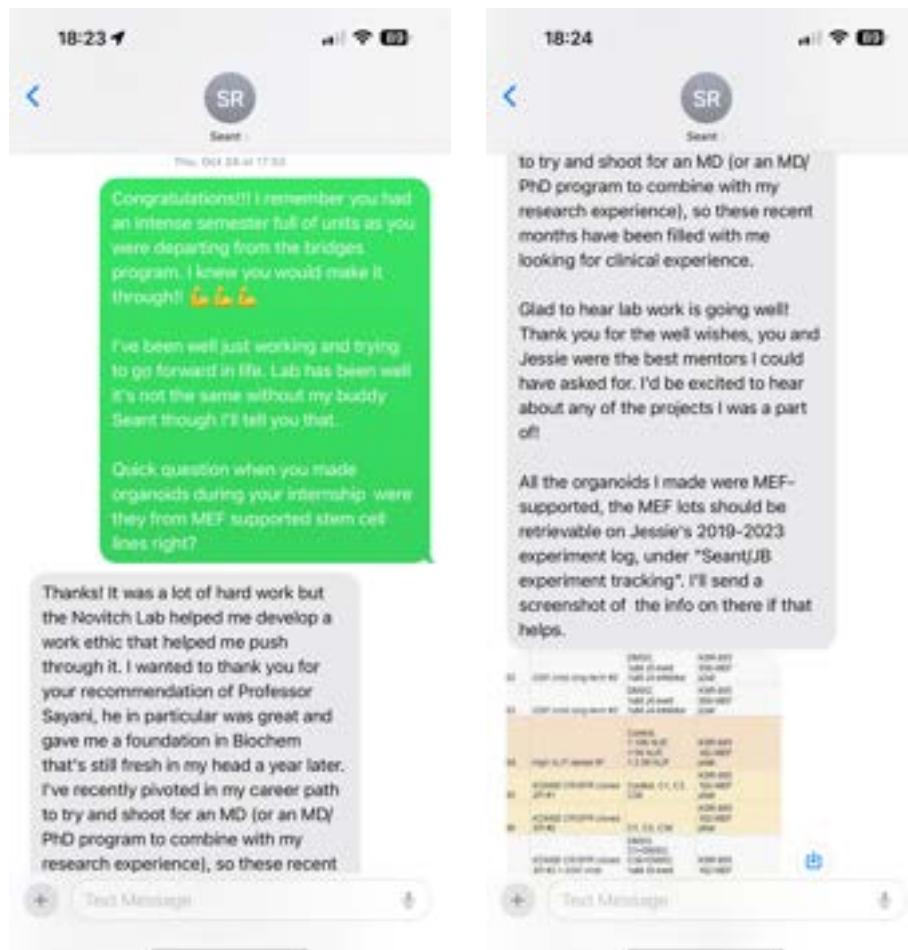
Example 6 SANDEEP GUPTA/  
Cristian Rodriguez Butler lab



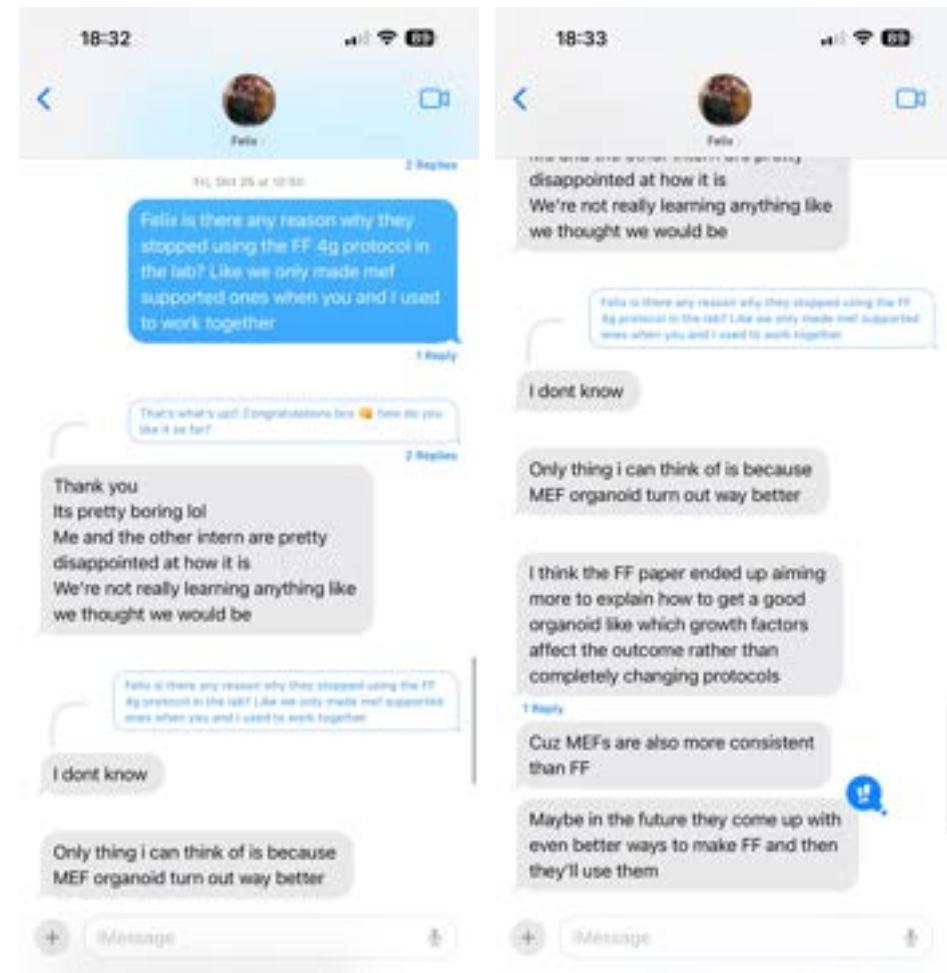
Example 4  
Cendi Ling

Former lab members Seant and Felix have confirmed that the lab did not use a feeder-free protocol in the 2-3 years leading up to my discovery.

Former Member #1  
Seant Ryan September 2022-August 2023



Former Lab Member #2  
Felix T Left the lab 2019-June 2023



# **Section VI.**

## **Ongoing Retaliation**

# Ongoing Systemic Retaliation

The refusal to implement reasonable accommodations for my mental health condition is part of an ongoing pattern of retaliation stemming from my previous whistleblowing and protected legal actions. For example, my supervisor's insistence that I attend every lab meeting in person, despite my healthcare professional's recommendation for accommodations, is a clear retaliatory act. This decision directly impacts my ability to manage my mental health, and it creates unnecessary barriers to my performance at work. These actions are not isolated; they reflect a broader, systematic effort to punish me for raising legal concerns and asserting my rights. The failure to accommodate my condition is causing me significant distress and is clearly undermining my ability to maintain a supportive, productive work environment, which is crucial for both my health and my ability to meet my job responsibilities. This ongoing retaliation is not only harming my mental well-being but is also in violation of both my rights under the ADA and my rights as a protected class member.

See next slide...

**Harout Gulessarian**  
Re: Lab meeting  
To: Solzic Riche, Cc: BENNETT NOVITCH

October 24, 2024 at 8:19 AM

Details

Good morning.  
Could someone please forward the zoom link for today's lab meeting? Thank you!  
Kind regards,  
Harout

[See More from Solzic Riche](#)

Found in inbox - iCloud Mailbox

**BENNETT NOVITCH**  
Re: Lab meeting  
To: Harout Gulessarian, Cc: Solzic Riche

October 24, 2024 at 8:36 AM

Details

Hi Harout,  
As was stated in the lab expectations meeting in September, we are not holding lab meetings over zoom barring another pandemic or event that closes the university.

Ben

[See More from Harout Gulessarian](#)

**Harout Gulessarian**  
Re: Lab meeting  
To: BENNETT NOVITCH

October 24, 2024 at 8:48 AM

Hi Ben,  
Thank you for your response. I understand the lab's policy on meetings; however, I would like to clarify my request regarding Zoom meetings. My mental health is very important to me, and attending these meetings in person has been taking a toll on me as I had mentioned to you earlier in the week. If necessary, I am willing to provide further documentation from my healthcare provider to support my request for further accommodations. Please let me know how we can move forward.

Thank you for your understanding.

Harout

On Oct 24, 2024, at 8:36 AM, BENNETT NOVITCH <[bennitch@ucla.edu](mailto:bennitch@ucla.edu)> wrote:

As was stated in the lab expectations meeting in September, we are not holding lab meetings over zoom barring another pandemic or event that closes the university.

**BN** From: BENNETT NOVITCH >  
To: Harout Gulessarian >  
Yesterday at 09:52

Hi Harout,

I will excuse you from todays lab meeting, while I discuss this situation with the office.

Ben

13:55 5G 

Inbox 8 Messages Lab meeting ▲ ▼

**BN BENNETT NOVITCH** Yesterday  
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

13:55

5G 31

**Inbox** 8 Messages **Lab meeting**

I found in Sent Mailbox

**Harout Gulessarian**

To: BENNETT NOVITCH &gt;

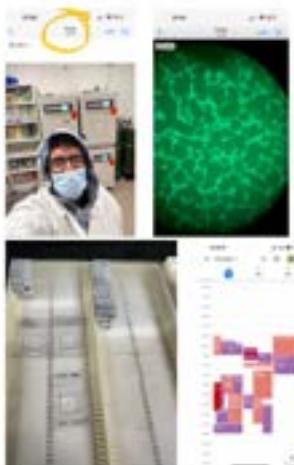
Yesterday

16:00,

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 warranties, and no admissions, especially given the below evidence supporting and suggesting an alternative viewpoint.

**3. Absence 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 Biobank -40°. I went to lunch from 12:00PM-12:30pm. I performed 4 different blocks from 12:30-3:30pm. Additionally, you can see me around 3:30 PM in the TC at the end of my work shift, where I was actively engaged in finding and preparing 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 Syne-Tomato Cells**

Regarding the KOLF 2.21 line with the Syne-tomato reporter, I must emphasize that our previous conversations on Friday prior to leaving due to unfortunate situation that had occurred with Sunday, confirmed that I had left you a plate of these stem cells at 90% confluence, following our discussions 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 discuss it nor instruct anyone else to do so.

In furthermore, I had asked you kindly to remake the Syne-Tomato plasmids for the transfection, as the current plasmids were not as effective

13:56

5G 31

**Inbox** 8 Messages **Lab meeting**

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 discuss it nor instruct anyone else to do so.

In furthermore, I had asked you kindly to remake the Syne-Tomato 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 to 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 Fender-Frye organisms and the discovery of SARS, along with several successful reporter line insertions, and expansions (GFP-R3-TT, mCherry-R3-TT, and GFP-KO), etc. I also informed you about the progress on the sustained slides you and Irakli are working on. I have consistently engaged in my work duties, including performing 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 Shafrazi lab respectively since my return to work from FMLA. This includes without limitations interactions on August 22 with Cristian from the Shafrazi lab, September 28 with Diana and Angel, October 4 with Salma from the Shafrazi lab, and October 6 again with Diana.

You mentioned that my removal was 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 communications breakdown, please reach out directly through UCLA Slack or email in the future, as I am available and responsive on both platforms. While I do not have notifications on email, I check the platforms every hour for updates or requests from others as I had mentioned this to you in person on Tuesday.

**Inbox** 8 Messages **Lab meeting**

Re: [REDACTED] Re: [REDACTED] Please see attached large image for the big reason!

Harout G. 10:00 AM Yesterday

Harout G. 10:00 AM Yesterday

Important Reminders for Saturday and Sunday

Hello Diana and Angel,

I wanted to leave some notes for you regarding the plates in the incubators. Please find the details below.

13:56

5G 31

**Inbox** 8 Messages **Lab meeting**

or email in the future, as I am available and responsive on both platforms. While I do not have notifications on email, I check the platforms every hour for updates or requests from others as I had mentioned this to you in person on Tuesday.

**Inbox** 8 Messages **Lab meeting**

Re: [REDACTED] Re: [REDACTED] Please see attached large image for the big reason!

Harout G. 10:00 AM Yesterday

Angel Novitch 10:00 AM Yesterday

Important Reminders for Saturday and Sunday

Hello Diana and Angel,

I wanted to leave some notes for you regarding the plates in the incubators. Please find the details below.

**Inbox** 8 Messages **Lab meeting**

Re: [REDACTED] Re: [REDACTED] Please see attached large image for the big reason!

Harout G. 10:00 AM Yesterday

Christian Rodriguez 10:00 AM Yesterday

Important Reminders for Saturday and Sunday

Bellissima! You made some great improvements! Thanks a lot!

Tristan 10:00 AM Yesterday

Message Citation Response

**5. Confidentiality of Healthcare Matters**

Lastly, the suggestion that my accommodation request is unreasonable or that you cannot fulfill it without disclosing my healthcare matters to office staff is unfounded. My healthcare information is confidential and should be treated on a need-to-know basis, reserved strictly for documentation purposes rather than public disclosure. If there are specific issues preventing you from fulfilling my accommodation request, I would appreciate your perspective on these matters. However, I would like to emphasize that I am not responsible for others' work ethic or commitment. If the issue with Zoom, as you have mentioned before, is related to the overall engagement of the lab, that is a separate discussion that falls outside my purview.

**Conclusion**

In light of the above, I find the assertions made in your email regarding my absence and lack of communication to be both misleading and unsubstantiated. I am committed to maintaining open lines of communication and ensuring that projects continue to progress effectively.

Thank you for your attention to these matters. I look forward to resolving these concerns and continuing to contribute positively to the team.

Best regards,  
Harout

UCLA HR has approved my reasonable accommodation to attend lab meetings virtually, yet Bennett continues to refuse to comply with this arrangement. Despite the official approval, he insists on in-person attendance, disregarding both the accommodation and the impact it has on my well-being.

09:53 1 5G 16

Inbox 4 Messages

Harout Gulessarian To: Shelly, Victoria Thursday

**Harout Gulessarian UID: [505876880](#)**  
**- Failure to provide reasonable accommodations**

**CONFIDENTIALITY NOTICE:** This message and any attachments are intended solely for the individual or entity to whom it is addressed. It may contain confidential information that is not to be disclosed. Unauthorized use, retransmission, or dissemination of this information is strictly prohibited. If you have received this message in error, please notify the sender immediately by phone or return email and delete this message and any attachments from your system. Thank you.

Dear UCLA,

I hope this message finds you well. I am writing to follow up on my request for reasonable accommodations for my mental health condition, as recommended by my healthcare professional.

Unfortunately, I have encountered retaliation including but not limited to precluding implementation of these reasonable healthcare accommodations, particularly regarding my supervisor's retaliatory insistence on demanding I attend every single lab meeting physically in person rather than over zoom. This retaliatory denial not only intentionally affects my ability to manage my mental healthcare matters, but on its face is direct evidence of ongoing and systematic retaliatory actions related to my previous and continued lawful legal notices and lawful complaints submitted to UCLA regarding very important legal matters.

Without limitations, these types of actions, or inactions, because of the systematic and ongoing pattern by management and supervisors are intentional and causing me significant damages, without limitations, distress and represent a management action that affects my existing terms and conditions of employment in a very obvious material and negative way.

I would greatly appreciate your assistance in addressing this matter and ensuring that my accommodations are honored. Time is of the essence.

It is important for me to maintain reasonable accommodations so as to insure a supportive work environment that allows me to perform my daily expected workplace functions, which due to the retaliation, I obviously can not do.

Thank you for your understanding, and I look forward to your response. Please advise.

Best regards,  
Harout Gulessarian

09:55 1 5G 16

Inbox 4 Messages Harout Gulessarian UID: 5...

Without limitations, these types of actions, or inactions, because of the systematic and ongoing pattern by management and supervisors are intentional and causing me significant damages, without limitations, distress and represent a management action that affects my existing terms and conditions of employment in a very obvious material and negative way.

I would greatly appreciate your assistance in addressing this matter and ensuring that my accommodations are honored. Time is of the essence.

It is important for me to maintain reasonable accommodations so as to insure a supportive work environment that allows me to perform my daily expected workplace functions, which due to the retaliation, I obviously can not do.

Thank you for your understanding, and I look forward to your response. Please advise.

Best regards,  
Harout Gulessarian

New Message

**October 31 2024 16:57pm Email**



**Shelly Frohrip**  
To: Harout, Victoria >

Thursday

**RE: Harout Gulessrian UID:  
505876880 - Failure to provide  
reasonable accommodations**

Hello Harout,

Thank you contacting me and providing your updated medical note. I have contacted your department about accommodating your updated needs:

- Avoid being in enclosed spaces with groups of people larger than 4-5 individuals.
- Attend meetings involving more than 5 participants via Zoom

I would like to discuss your updated needs with you, would you have time for a call on 11/4 at any of the following times:

9:00, 9:30, 11:00, 11:30, 12:00, 12:30, 3:30, 4:00

I also want to follow up on your previous accommodation for flexible hours- working 7:00 a.m.-3:30 p.m. to ensure that this is still in place. Disability Management assists with the accommodation process.

Regarding your statements of retaliation in your email, The Employee Disability Management Services office does not conduct investigations. I am referring you to the UCLA Discrimination Prevention Office: [odso@ucla.edu](mailto:odso@ucla.edu). This office is responsible for investigating reports of discrimination or harassment based on race, ancestry, national origin, disability, religion, age, and other categories protected by law and University policy brought against academic personnel. It is one of the units under the Civil Rights Office (CRO). To file a complaint, please complete the [ODO Complaint Form](#) via the electronic form.

I hope we can find a mutual time on Monday, 11/4 to review your accommodation needs.

Thanks,  
Shelly

Shelly Frohrip  
Employee Disability Management Services-Program Manager  
Email: [shfrohrip@um.ucla.edu](mailto:shfrohrip@um.ucla.edu)



New Message

## Ongoing retaliation and complete Demotion from all projects

Bennett's refusal to accommodate virtual participation in lab meetings is not only inconvenient but also takes a significant toll on my mental health. In the past, he held Zoom meetings, and with today's technology, attending virtually should no longer be an issue. Forcing me to attend in-person meetings where I am subjected to derogatory comments and inappropriate discussions—such as advising not to use UCLA email addresses or boasting about deceiving reviewers with questionable data—adds unnecessary stress. This environment, coupled with the pressure to be physically present, creates a toxic atmosphere that undermines my well-being and the integrity of our work.

Furthermore, I have been completely demoted from all projects in the lab and am singled out to be a one-man team (took away my partner). The latest instances has been not providing me work assignments and going on about his day.

10:01 10:01 10:01

< Sent > ^ v

From: Harout Gulessserian >  
To: BENNETT NOVITCH >  
October 31, 2024 at 09:56

**Fwd: Lab meeting**

Hi Ben,

I did not receive a zoom link for today's meeting.  
Will you kindly forward the link so I can attend?

Harout

Begin forwarded message:

**From:** Samantha Butler <[butlersj@ucla.edu](mailto:butlersj@ucla.edu)>  
**Date:** October 30, 2024 at 11:32:00 PDT  
**To:** Soizic Riche <[soizic.riche@gmail.com](mailto:soizic.riche@gmail.com)>  
**Cc:** Samantha Butler <[butlersj@ucla.edu](mailto:butlersj@ucla.edu)>, Marie Payne <[mpayne6@g.ucla.edu](mailto:mpayne6@g.ucla.edu)>, MYDIA PHAN <[mydia@g.ucla.edu](mailto:mydia@g.ucla.edu)>, Salena Gallardo <[sgallardo@g.ucla.edu](mailto:sgallardo@g.ucla.edu)>, sandeep gupta <[sandeepscience9@gmail.com](mailto:sandeepscience9@gmail.com)>, Angel Emodi <[aemodi@g.ucla.edu](mailto:aemodi@g.ucla.edu)>, María Caballero <[mariacabriy@g.ucla.edu](mailto:mariacabriy@g.ucla.edu)>, Harout Gulessserian <[hkg90@icloud.com](mailto:hkg90@icloud.com)>, [isaiah.estr77@gmail.com](mailto:isaiah.estr77@gmail.com), "Ibrahim, Diana" <[diana.ibrahim.006@my.csun.edu](mailto:diana.ibrahim.006@my.csun.edu)>, YESICA

New Message

10:02 10:02

< Inbox > ^ v

Found in Inbox 4 Messages

BN From: BENNETT NOVITCH >  
To: Harout Gulessserian >  
October 31, 2024 at 10:12

**Re: Lab meeting**

Hi Harout,

As previously discussed, we are intending to hold lab meetings in person only.

Ben

Sent from my iPhone

On Oct 31, 2024, at 9:56 AM, Harout Gulessserian <[hkg90@icloud.com](mailto:hkg90@icloud.com)> wrote:

See More

New Message

## November 5<sup>th</sup> 2024 Lab meeting 1:00pm

### **Supervisor Novitch's Failure to Accommodate Healthcare approved Reasonable Accommodations**

Even yesterday, I was unable to participate in the lab meeting because Bennett refused to allow virtual attendance, despite the reasonable accommodation being approved by UCLA HR. It feels as though something is being hidden, as there is no legitimate reason why I shouldn't be able to attend virtually, especially with the technology available and the accommodation in place.

Inbox

Found in Inbox

From: Soizic Riche >  
To: Samantha Butler > Marie Payne >  
mydia@g.ucla.edu > SALENA GALLARDO >  
sandeeprgupta > Angel Emodi >  
mariacabrv@g.ucla.edu >  
Harout Gulessserian >  
isaiah.estr77@gmail.com > Diana Ibrahim >  
YESICA MERCADO-AYON >  
ericknedd03@g.ucla.edu >  
Cristian Rodriguez > Soizic Riche >  
demirjet@gmail.com > Cendi Ling >  
BENNETT NOVITCH >  
NATELLA VAHKTANGOVNA BALIAOURI >  
ANTONELLA DEL TORO >  
yahirj911@gmail.com > Keith Phan >  
Jessie Butch > Sangmok Kim >  
tingf@ucla.edu > charleneguo@g.ucla.edu >

November 4, 2024 at 17:58

**Lab meeting**

Hi all,

Lab meeting is at **1pm** tomorrow.

Soizic

New Message

# Section VII.

## Conclusion

Now, as we come full circle again, we return to the beginning of the invention. October 2<sup>nd</sup> Bennett Novitch stated that he would like to produce a better narrative than the true narrative of the accidental discovery made by me Harout Gulessarian. On October 5th, Sandeep and Butler approached me, trying to see if I would mistakenly disclose the name of the molecule to their lab. This would have allowed them to claim it as their own and waive my rights. Following this, Supervisor Ben Novitch sent me a different protocol on October 27 for the rotation student to try, since I had not shared my own protocol with them. The protocol is directly related to the Butler lab hence here is the direct link of the possible fraud occurring. Over the next few months, there were numerous attempts to steal my discovery. At one point, Sandeep told me I would eventually have to give up the IP to Bennett and to negotiate with Bennett about what I could get in return for my own discovery that is owned by UCLA not Bennett. After receiving this message and numerous others for instance from Natella Balliaouri, which clearly indicated an intent to steal university assets, I faced further hostility and retaliation from Supervisor Novitch and then Supervisor Novitch's spouse Supervisor Samantha Butler followed by all the members involved as a direct retaliation for whistleblowing the improper governmental activity occurring within the two labs, the consortium and the department of Neurobiology collectively.

Initially, Supervisor Novitch's spouse Supervisor Butler's hostility was confusing, as she would frequently blurt out, "You have been robbed," directed at me during lab meetings. Then, on April 24th, Supervisor Novitch's spouse Supervisor Butler exploded at me in front of bystanders around 4:10pm- 4:15 PM CHS 1st floor by Café Med. This behavior now makes sense; if they were attempting to claim my discovery as their own due to their discriminatory acts and intentions, it would explain why someone would make such comments or shout at me in public and a direct intent to fire me. This pattern of behavior feels far too coincidental, and I suspect fraudulent activity is occurring within both labs the consortium and the department. What Cristian Rodriguez stated on the 5<sup>th</sup> of September confirms that there has been leaks of my invention to other labs because Rodriguez when questioned about SB name dropped SB590885 (This is a clear indication that my discovery being fabricated/falsified through the Butler lab because as I mentioned previously SB4 is the commonly used SB molecule in the field the fact that Rodriguez mentioned SB590885 and stated Sandeep had an interest to try it out when points directly to research misconduct). Again, there is evidence showing a major coverup or an attempts to steal UCLA property and claim the rights to the invention as their own.

It appears there has been significant misrepresentation(s) and a major cover-up is underway. Cendi Ling is not a creator or inventor of this protocol or discoverer of the molecule. Jessie Buth is not a creator or inventor of this protocol or discoverer of the molecule. . Bennett Novitch is not a creator or inventor of this protocol or discoverer of the molecule he solely contributed by funding the experiments. Sandeep Gupta is not a discoverer of the small molecule. Supervisor Novitch's spouse Supervisor Samantha Butler's lab is not the discoverer of the small molecule. Cristian Rodriguez from the Butler lab is not a discoverer of the small molecule. The Butler lab is not a discoverer of the small molecule. Period.

This is not about the Butler lab or the collective knowledge of the Novitch lab; it is, as previously mentioned, the result of the hard work of one employee (Harout Gulessarian) who carried the weight of two graduate students, creating this invention while working tirelessly seven days a week without extra pay or compensation for holidays, weekends, or overtime. Instead of recognition, I faced and continue to face extreme retaliation, which sought to undermine both the University and my position as a scientist. My allegiance is to UCLA, as I signed a patent acknowledgment contract on my very first day of employment, which I object to violating myself as I respect my parent institution UCLA.

What the others have done is complete and utter nonsense and is leading to the suspicions of fraud and deceptive misleading practices that are occurring at UCLA. The only individual who is the discoverer, inventor, and creator of this novel finding is Harout Gulessarian. I humbly remained true to UCLA and adhered to the established guidelines for reporting potentially patentable intellectual property owned by UCLA the parent institution not NIH or other third-party bad actors. Everyone at UCLA has an obligation to uphold the University standards to the highest order and abide to those rules, laws, and regulations, rather than being mislead or falling into the hands of those that seem to practice deceptive misleading practices without considering the interests of the University and all of the implemented rules laws and regulations. UCLA has previously implemented strict laws on whistleblower retaliation. Those laws and policies need to be upheld when going through the evidence provided in my case.

# 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](mailto:Hkg90@icloud.com), as I am in the process of transitioning my legal team and will update your office accordingly.

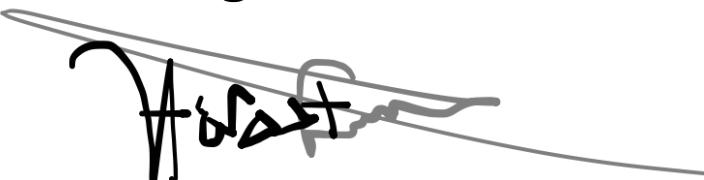
### Sworn Declaration

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:**

A handwritten signature in black ink, appearing to read "Harout Karnik Gulessarian". It is written in a cursive style with some stylized characters.

**Date:**

November 6<sup>th</sup>, 2024

Harout Karnik Gulessarian

[Hkg90@icloud.com](mailto:Hkg90@icloud.com)

Case Number: EP23681