

UCLA Administrative Policies & Compliance Office
Attn: Locally Designated Official Vice Chancellor Mark Krause
Wilshire Center, Suite 700
10920 Wilshire Boulevard
Los Angeles, CA 90024

Representation and Communication Preferences

Representation

I hereby designate Jafari Law Group as my legal representative in this matter. Jafari Law Group will be handling all aspects of my complaint and representing me throughout the complaint process.

Communication Preferences

Please direct all correspondence and communication regarding this complaint to both Jafari Law Group and myself. It is crucial that both parties receive all relevant information and updates related to the complaint to ensure proper handling and response.

Contact Information

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****All terms, provisions set forth in any and all Attachments to this instant Complaint are hereby incorporated herein by reference with the same force and effect as though fully set forth herein in this instant Complaint.****

****It is submitted that the evidence attached below is sufficient not only to suggest but also to establish that Harout Gulessarian has been subject to negative treatment due to his protected class categories, without limitations. Accordingly, a formal investigation should be initiated, and a written report detailing the findings of both fact and law must be provided to Harout Gulessarian.****

****Harout Gulessarian makes no waivers, no admissions, reserves 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 the disclosing office and myself, 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.****

Abstract

This memorandum is a formal complaint regarding significant alleged violations of UCLA policies and legal breaches concerning the handling of UCLA-owned intellectual property by Principal Investigator Bennett Novitch and other UCLA employees. Harout Gulessarian, a UCLA employee, has reported misconduct related to the Feeder-Free Brain Organoid Protocol and the novel use of small molecule SB590885. The complaint includes obstructive behavior, threats, verbal abuse, and attempts to misappropriate intellectual property, resulting in a hostile work environment where Gulessarian had been working for 7 days a week without being compensated for, and retaliatory actions prior, during, and after FMLA. Without limitations the memorandum provides a detailed timeline of incidents and requests an immediate investigation.

Background

Harout Gulessarian, a UCLA employee, highlights disturbing events requiring expert oversight on ethical misconduct and retaliatory behavior within the Novitch/Butler lab and the department of Neurobiology. This memorandum outlines the alleged violations and the corresponding issues of retaliation, misappropriation, and hostile work environment.

In accordance with UCLA policies, and California Government Code Section 8547.2(c), the following improper governmental activities have occurred during Gulessarian's employment in the Novitch Lab at UCLA. These activities are outlined in detail in this memorandum and include:

- *Corruption*: Dishonest or fraudulent conduct by those in power, often involving bribery. Instances include the misappropriation of intellectual property and misleading statements by UCLA employees.
- *Malfeasance*: Wrongdoing or misconduct, especially by a public official. This is reflected in the failure to address and report hostile behavior and the obstruction of intellectual property reporting.
- *Bribery*: Offering, giving, receiving, or soliciting something of value to influence actions. Allegations include the potential use of Harout's discoveries for personal gain without proper credit but offering recommendation letters should I disseminate the protocol to other labs prior to TDG protecting the IP.
- *Theft of Government Property*: Unauthorized taking of government or public entity property. This includes the unauthorized use or potential misappropriation of Harout's discoveries.
- *Fraudulent Claims*: Intentionally making false statements for improper benefits. This includes misleading statements about Harout's whereabouts and the handling of FMLA leave.
- *Fraud*: Deception or misrepresentation for personal gain. Instances include deceptive practices surrounding FMLA leave and the mishandling of intellectual property disclosures.

- *Coercion*: Using force or threats to compel actions. This includes threats of termination and verbal abuse related to Harout's intellectual property and FMLA leave.
- *Conversion*: Unauthorized assumption of ownership rights over another's property. This is evident in attempts to claim credit for Harout's discoveries and protocols.
- *Misuse of Government Property*: Improper use of government resources. This includes the inappropriate handling and potential misappropriation of research findings and intellectual property.
- *Willful Omission to Perform Duty*: Deliberate failure to fulfill legal or policy obligations. This includes the failure to address hostile work environments, to properly report and safeguard intellectual property, and to adhere to FMLA procedures.

Summary and Request for Action

The memorandum outlines a series of serious allegations against Bennett Novitch, Mark Lucas, Helen Nguyen, Samantha Butler, and other members of the UCLA community. These include obstruction of intellectual property reporting, hostile work environment, retaliation, and misappropriation of discoveries, and likely the fabrication of data. Immediate action is required to:

1. **Investigate** the alleged violations of UCLA policies and legal breaches.
2. **Address** the hostile work environment and retaliatory actions.
3. **Provide** a written report on the outcome of the investigations
4. **Ensure** proper protection and credit for UCLA-owned intellectual property.

Exhibits and documentation supporting these claims are included for review below. Your prompt attention to this matter is crucial to uphold academic integrity and employee protections at UCLA.

Legal and Ethical Implications of Retaliation

I. Protected Activity

1. **Intellectual Property Reporting to TDG:**
 2. See pages 259-260 to see Bennett Confirming Gulessarian's accidental use of molecule and potential for being a new agent to promote organoid formation.
 3. See UCLA Slack messages between Gulessarian and Novitch around October 27-30 where Novitch states that Gulessarian will be lead author and on any patent application.
 4. See all evidence how Novitch over the course of time shifts his approach and misleads Gulessarian about reporting policies and the retaliatory activity after Gulessarian blows the whistle raising concerns about the issues identified throughout the memorandum.

Legal and Ethical Implications of Retaliation

I. Protected Activity

1. Protected Disclosures: Intellectual Property Reporting to UCLA TDG

On January 12, 2024, I, Harout Gulessserian, reported a breakthrough scientific discovery and associated protocol developed in the Novitch lab to UCLA's Technology Development Group (TDG). The disclosure was made to Vice Chancellor Amir Naiberg, and Chief Intellectual Property Officer (CIPO) Charanjit Arora. This initial communication was aimed at initiating the patent process and protecting the intellectual property (IP) (See p. 183-200).

Over the course of approximately one and a half months, Gulessserian engaged in ongoing discussions with CIPO UCLA TDG. During this period, Gulessserian submitted three draft manuscripts to the CIPO as part of the process to advance IP protection. The CIPO expressed enthusiasm about the discovery and the potential for patent protection. (See p. 182-200). CIPO was lacking MTA and Sponsor information to finalize the pre-patent provisional application under USPTO (See p. 200).

However, Bennett Novitch, Gulessserian's supervisor, obstructed the process by failing to provide the necessary Material Transfer Agreement (MTA) and Sponsor information required to complete the patent application (See p. 42, 56-60, 72-77, & 84-89). Instead, Bennett Novitch retaliated against Gulessserian, including making threats to Gulessserian's job on several occasions if Gulessserian did not comply with Novitch's demands to bypass established policies and procedures of UCLA, State, and Federal laws (See p. 86 & 90).

On February 6, 2024, Gulessserian was informed via Slack—reiterating concerns previously expressed to Gulessserian verbally by multiple members of the Novitch/Butler lab—that there was probable cause to believe that the intellectual property (IP) Gulessserian had discovered was going to be misappropriated by graduate student Natella Baliaouri (See p. 36). This misappropriation constituted a violation of UCLA policies as well as State, and Federal intellectual property laws.

Gulessserian formally whistle blew this issue to Bennett Novitch on February 23, 2024. Despite the severity of the claim, Gulessserian's disclosure did not lead to immediate corrective action but rather seemed to exacerbate the retaliatory environment Gulessserian was already facing. Bennett Novitch cursed at Gulessserian "I don't give a shit" about policy, grinded his teeth at Gulessserian, along with verbal abuse directed at Gulessserian. Gulessserian was extremely intimidated and feared his well-

being during this in-person meeting with Novitch. Novitch during the same evening made an admission to his acts and tried to “apologize” (See p 49) but continued his retaliatory/anger animus towards Gulessarian as time persisted forward.

Hostile Work Environment and Retaliation:

Following the discovery of the special molecule SB590885, concerns about its potential misappropriation intensified within the lab. Bennett Novitch sent individuals to work closely with Gulessarian, who would then document Gulessarian’s protocol steps and share them with other members without Gulessarian’s knowledge, further exacerbating Gulessarian’s fears about IP theft.

Gulessarian publicly expressed concerns on X (formerly known as Twitter) on December 8, 2023, emphasizing the need to safeguard UCLA intellectual property and ensure proper credit to the true inventor, Gulessarian (See p. 201). Gulessarian also communicated these concerns through direct reports to Bennett Novitch, the entire Novitch lab with Chief Intellectual Property Officer Charanjit Arora blind-copied in the email chain (See p. 34). Additionally, Gulessarian filed numerous complaints to HR regarding hostile work conditions, ongoing retaliation, and attempts to misappropriate UCLA-owned intellectual property throughout 2023 and 2024 (See without limitations; all HR communications below (p. 91-181).

This hostile environment was further reported to UCLA Confidential Counseling in late January (See p. 202) and to the Office of Ombud’s (Brenda Woods and Thomas Griffin) (See p. 203). Despite assurances, after meeting with Thomas Griffin twice, Griffin was set to mediate the issues after a three-week mental health break for Gulessarian. Instead, on April 24, 2024, Gulessarian was verbally assaulted by Bennett Novitch and Samantha Butler on the first floor of CHS, in front of public bystanders, which further necessitated Gulessarian’s immediate need for FMLA leave.

During Gulessarian’s FMLA leave, retaliatory and discriminatory actions further escalated. Mark Lucas (Neurobiology Department CAO) and Bennett Novitch conspired to retaliate against Gulessarian and continued discriminatory actions concerning Gulessarian’s mental health condition. This retaliation extended beyond Novitch to include Samantha Butler (PI in Neurobiology) who yelled at Gulessarian and also threatened termination in public, Mark Lucas (CAO Neurobiology) who mishandled Gulessarian’s FMLA initiation, failed to make a report when Gulessarian

whistle blew the actions of Novitch/Butler, and reported false claims about Gulessrian's compliance, and Helen Nguyen (HR Representative Neurobiology) who enabled discriminatory practices towards Gulessrian after numerous notifications of the actions going on in the Novitch Butler lab were reported to Nguyen (See all HR communications).

Additionally, members of Novitch's and Butler's labs have begun using the proprietary discovery Gulessrian made without allowing UCLA to protect its assets. There are signs of a cover-up further compounding the retaliatory and hostile environment Gulessrian is facing.

Illegal Orders Refused:

Misappropriation and Disclosure:

Gulessrian refused to comply with Bennett Novitch's implicit and explicit orders to share his discovery with external parties without ensuring adequate protection or proper acknowledgment of intellectual property rights and duties to report to UCLA TDG. These orders were communicated through various channels, including meetings, text messages, and emails. For example, on February 23, 2024, Bennett instructed Gulessrian to demonstrate the protocol to him in person and share it with Aparna's lab before he would even consider taking any action in accordance with policy. On April 4, 2024, Bennett claimed he would sign off on the patent agreement only if Gulessrian shared the discovery simultaneously with Aparna's lab, which would have occurred without the safeguarding measures of TDG. Bennett ultimately did not sign off on the patent agreement and instead escalated his hostile and abusive behavior, increasing retaliatory actions against Gulessrian.

In response, Gulessrian sought proper channels to protect his discovery and reported the issue to UCLA TDG. The Chief Intellectual Property Officer (CIPO) was notified of the repeated attempts to misappropriate Gulessrian's discovery within the lab (See p.182-200), and Gulessrian also reported these issues to the Office of Ombud's (See p 203) and various HR departments within the institution (See p. 90-181).

After learning about Gulessarian's disclosures to the CIPO and UCLA TDG, Bennett Novitch took steps to prevent further communication between Gulessarian and the CIPO, attempting to cover up his actions and obstruct Gulessarian's efforts to receive proper credit for Novitch's work. This move appears to be driven by internal motivations and greed, aimed at denying Gulessarian recognition and exploiting the intellectual property for Novitch own gain (See p 86).

II. Adverse Personnel Action

Adverse Personnel Actions:

Hostile Behavior and Retaliation: Hostile Work Environment and Retaliation:

On February 23, 2024, Bennett Novitch exhibited extreme hostility towards Gulessarian, including yelling, threatening termination for reporting to TDG, grinding his teeth, and cursing ("I don't give a shit" about policy) (See p. 45-48). This aggressive behavior was compounded by subsequent incidents, such as spreading false narratives about how others perceived Gulessarian and his protocol (See p. 50). Additionally, on April 19, 2024, Novitch made false statements about Gulessarian's whereabouts to the Department CAO, Mark Lucas (See p. 95 first then p 93). On April 24, 2024, Novitch and Samantha Butler subjected Gulessarian to further verbal abuse in front of public bystanders at UCLA.

This abusive conduct was reported multiple times to the Department CAO Mark Lucas and Department HR Nguyen (See without limitations p 94 & 179, 204-209). Despite these reports, no action was taken to address the situation. Instead, the department's response was to retaliate against Gulessarian collectively through Novitch, Lucas, Nguyen, Butler, and members associated to the Butler/Novitch labs.

Following Gulessarian's whistleblowing and disclosure to TDG, Novitch's retaliatory actions intensified. The first instance of overt hostility occurred on February 23, 2024 (See p 45-49). This was followed by further incidents on April 24, 2024 (See p 94), and again on August 19, 2024. These three incidents of getting verbal abuse were all in-person encounters.

Upon Gulessarian's return from FMLA on August 6, 2024, Novitch was on vacation, and Mark Lucas extended Gulessarian's FMLA to August 13, 2024 (See p. 210). On the 12th Nguyen reached out to Gulessarian stating that his return was on the 12th and not the 13th when Mark Lucas's email clearly stated to return to lab on the 13th (See p. 211-212). When Gulessarian returned on August 13, 2024 he spent eight hours waiting in the lobby of the CHS building for instructions to go to the lab as he was informed by Lucas not to go up to lab unless Gulessarian has a work assignment (See p 210). Gulessarian informed Helen Nguyen of his wait in the lobby (See p. 212). Nguyen then abruptly informed Gulessarian on the 14th of August that Gulessarian was now on administrative leave rather than an extended FMLA leave (See p 212).

Throughout this period, Novitch and others made numerous attempts to coerce Gulessarian into abandoning his rights as the inventor and creator. Upon Gulessarian's return on August 19, 2024, Novitch again exhibited hostility, telling Gulessarian to "go home," using the exact same phrase he had used on April 24, 2024.

Prior to this meeting, Gulessarian had communicated to HR representative Helen Nguyen that a third party (HR rep Nguyen) was required to be present due to the extreme hostile retaliatory behavior Gulessarian had endured previously (See p 213). While Nguyen confirmed via email that Nguyen would be present (See p. 214) during the meeting with Novitch on August 19, Nguyen failed to show up without any prior warning to Gulessarian. This left Gulessarian to enter a hostile environment with no employee protections in place where again Gulessarian had to experience hostile behavior even though he clearly communicated to Nguyen the importance of Nguyen's presence in that meeting (See p. 213).

FMLA Leave Issues:

Gulessarian's request for FMLA leave, which began on April 24, 2024, was met with significant complications due to misleading statements, and obstructions from Mark Lucas, the Department CAO, and Helen Nguyen, the HR representative by default (Mark provided the wrong email address to HR rep Helen Nguyen (See p.216), to which Gulessarian reached out and attempted to imitate FMLA on numerous occasions with Nguyen (See p. 217). These issues included:

Incorrect Guidance: Gulessarian received incorrect and confusing instructions on how to properly initiate and manage his FMLA leave. This created unnecessary barriers and delays in the process. Mark Lucas had claimed to be the FMLA initiator but failed to initiate FMLA rather was more concerned about Gulessarian's Healthcare plans (See p. 219).

Failure to Report Incidents: There was a failure to properly document and report the incidents that led to Gulessarian's need for FMLA leave, which impacted the accuracy and timeliness of his leave benefits.

Delays in Processing Benefits: There were significant delays in processing Gulessarian's FMLA benefits, exacerbated by bureaucratic obstacles and mismanagement (See all communications with Nguyen).

Fabrication of Facts: Throughout this period, false and misleading statements were made regularly to undermine Gulessarian's credibility. These fabrications were intended to portray him as dishonest or non-compliant, despite his adherence to the established policies.

Policy Adherence: Gulessarian followed the policy for requesting and managing FMLA leave; however, the obstructions and misinformation from HR and departmental staff led to unnecessary complications and a perception of impropriety.

Violation of Mental Health Measures under ADA: Mark Lucas provided an incorrect email address to HR and claimed to be the FMLA initiator yet did not initiate the FMLA process for Gulessarian. Thomas Griffin from office of Ombud's, who was aware that Gulessarian needed a mental health break prior to the April 24 incident with Bennett Novitch and Samantha Butler. Despite Gulessarian's attempt to take a 3-week "vacation" for mental health reasons, which was denied by Bennett Novitch, misleading statements were made to Mark Lucas on April 19. These statements falsely indicated that Gulessarian had walked off the job and taken an unapproved vacation, despite Gulessarian having communicated his healthcare needs to Novitch on the 19th and attempted to manage his leave appropriately (See p. 220-226).

Retaliatory Actions During FMLA

During FMLA, Gulessarian faced significant obstacles and retaliatory actions. Gulessarian was locked out of his account, preventing him from uploading necessary healthcare documentation to the LOAN system (See 227-232). Despite bringing this issue to HR representative Helen Nguyen, Nguyen did not respond or address the concern, which was crucial for staying compliant with healthcare documentation requirements per university procedures.

On May 7, 2024, Helen Nguyen and Mark Lucas opened a second FMLA ticket under Gulessarian's name, using the dates associated with this new FMLA ticket against him as if he had not complied with university policies or procedures for healthcare documentation (See p.124). Gulessarian had reached out to multiple HR departments, including

without limitations the Discrimination Prevention Office, Health Employee Relations Office, and Campus HR, providing screenshots and evidence of his compliance prior to being locked out of the system (See p. 227-232). Unfortunately, these efforts did not resolve the issue.

Nguyen attempted to force Gulessarian to prematurely submit return-to-work healthcare documentation six weeks before his anticipated return (See p 232-247). Gulessarian questioned Nguyen's integrity and raised concerns about the department's HR handling of the situation (See p 232-247). However, Nguyen consistently turned a blind eye to any issue that was raised (See p 232-247).

On Friday, August 2, 2024, the day before Gulessarian's scheduled return to work, Nguyen contacted him around 12:00 PM requesting additional documentation under threat of preventing his return to work (See p. 256). This short notice did not allow Gulessarian sufficient time to acquire the required documentation. Nguyen later used this situation to justify reflecting an administrative leave from August 11-17, 2024, on Gulessarian's pay stub(See p 257), despite his actual administrative leave being from August 6-19, 2024 as indicated by Nguyen (See p 211).

Retaliatory Actions Upon Return: After returning from FMLA leave on August 6, 2024, I faced further retaliation, including an incorrect administrative leave record (p 257 v p 211), and continued hostile behavior from Bennett Novitch, resulting in restricted job functions and ongoing harassment. Upon returning from admin leave Gulessarian intended to meet with the disability accommodation office manager Shelly Frohrip. Ben was insisting on going to the accommodation office with Gulessarian. Again, trying to impose his power over Gulessarian with clear intentions to hush Gulessarian up. This was reported to the accommodations manager through email (See p. 258).

Notification and Awareness:

Gulessarian became aware of the retaliatory actions immediately following the disclosure of his discovery to supervisor Bennett Novitch in late September. The retaliatory incidents began shortly after this disclosure and continued to escalate significantly following Gulessarian's whistleblowing graduate student Natella Balliaouri to Bennett Novitch on February 23 2024 along with mentioning the disclosures of the draft manuscript submitted to UCLA TDG where Novitch fully retaliated against Gulessarian by verbally assaulting Gulessarian.

The hostile and retaliatory actions intensified during the administration of Gulessarian's FMLA leave and have continued unabated. The adverse actions persisted even after his return to work on August 6, 2024. Notably,

Gulesserian was initially placed on what was termed an FMLA extension, which later transmuted into administrative leave.

Despite the Admin leave being documented as spanning from August 6, 2024, to August 19, 2024, HR recorded the administrative leave as running from August 11 to August 17, 2024, (See p 211 v 257) resulting in a lack of compensation for the days outside this recorded period and a continued effort of misrepresentation of facts within the department.

Nguyen also made false statements regarding a meeting note (See p. 213), to which Gulesserian stated his objections (See p. 214). Additionally, HR failed to follow up with a comprehensive report regarding Gulesserian's complaints about the hostile work environment and other related issues.

Upon returning to work, Gulesserian faced continued harassment, including constant monitoring, and hovering over his work area by Bennett Novitch. This ongoing harassment has contributed to an exacerbated and hostile work environment, further complicating Gulesserian's ability to perform his duties and exacerbating his distress.

Furthermore, it has now been confirmed verbally by a member of the Butler lab; Christian Rodriguez, that Gulesserian's discovery is now being used in their lab without TDG safeguarding the IP. This use of Gulesserian's discovery began only recently in the Butler lab and was not present before Gulesserian's identification of the small molecule. On the Butler/Novitch lab order sheet, there seems to be a quite a bit of overlap with the items ordered comparing with the results from my RNAseq. Recently Jessie Buth had analyzed RNAseq data from the Butler lab, and Sandeep Gupta seems to be the one who is conducting the research using the unique molecule based off of the verbal confirmation from Rodriguez on September 5th 2024 7:15am Novitch/Butler lab CHS 66-200k.

III. Contributing Factor Basis

Link Between Protected Activity and Adverse Actions:

Intellectual Property Protection: The hostile behavior and retaliatory actions against Gulesserian began immediately after his disclosures to Bennett Novitch on September 29, 2023. Despite Gulesserian's ongoing efforts to address concerns about intellectual property misappropriation within the lab, the retaliation intensified following his protected disclosure to UCLA TDG on January 12, 2024 (See p 182-200). This disclosure involved Gulesserian's breakthrough scientific discovery, and protocol, which Gulesserian submitted to UCLA TDG for proper protection. Subsequently, attempts by Bennett Novitch and others to misappropriate

Gulesserian's intellectual property emerged. These actions to obstruct the patent process and retaliate against Gulesserian were directly linked to his efforts to secure the appropriate protection and recognition for his work at UCLA and for raising whistleblower concerns to various departments.

Retaliation: The adverse personnel actions, including escalating verbal abuse, hostile behavior, and obstruction of FMLA leave, began shortly after Gulesserian's public and formal complaints about workplace hostility and retaliation were made. These complaints were conveyed through various channels, including social media, formal reports to HR, and discussions with the Office of Ombuds. The timing and nature of the adverse actions, such as the increased harassment following these disclosures, suggest a retaliatory motive in response to Gulesserian's protected activities. Notably, the retaliatory behavior continued to intensify further after Gulesserian's FMLA leave, characterized by discrepancies in leave documentation and ongoing harassment from members of the department. These patterns further corroborate the link between Gulesserian's protected activity and the adverse actions taken against him.

Evidence Supporting Retaliation: (See attached)

Hostile Behavior: Detailed documentation of hostile behavior, including emails and Slack messages, provides evidence of the escalating hostility directed at Gulesserian. This includes records of verbal abuse and unprofessional conduct from Bennett Novitch, Samantha Butler, and other involved parties.

Misleading Statements: Evidence includes misleading statements made by HR and department officials, such as incorrect guidance on FMLA procedures and false reports about Gulesserian's actions and whereabouts. These statements were documented through email correspondence and formal reports.

Procedural Obstacles: Records of procedural obstacles during Gulesserian's FMLA leave, including discrepancies in leave documentation and delays in processing benefits, support the claim of retaliation. These issues were documented through HR communications and leave records.

Witness Statements: Witness statements from colleagues and other individuals involved corroborate the retaliatory intent and actions taken by Novitch, Butler, and others. These statements provide additional context and validation of the hostile work environment and retaliatory behavior experienced by Gulesserian.

This evidence collectively demonstrates the link between Gulessarian's protected activities and the adverse actions taken against him, highlighting a pattern of retaliation.

Submission Requirements

Written: The complaint is documented in writing, providing a comprehensive account of the instances of retaliation, and identifying all involved parties. This documentation follows the Whistleblower Retaliation Complaint instructions and the prescribed form.

Required Elements: The complaint includes detailed descriptions of the adverse personnel actions experienced without limitations, the names of the individuals responsible, and the protected activities undertaken. It adheres to the format outlined in Attachment A, ensuring all necessary elements for review are addressed.

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."

Timely: The complaint is filed within twelve (12) months of becoming aware of the adverse personnel actions. The most recent retaliatory action occurred in September 2024, ensuring compliance with the filing deadline.

Evidence

Summary of Evidence for Retaliation

: Email from Harout Gulesserian to Bennett Novitch

Email Details:

- **Sender:** Harout Gulesserian
- **Recipient:** Bennett Novitch
- **Date and Time:** January 20, 2024, 6:43 AM

Context and Content:

- **Acknowledgment of Credit and RNAseq Initiation:**
 - Harout thanks Bennett for verbally confirming that only they will be credited for the discovery of using SB590885 for cerebral organoid formation and the unique cerebral organoid protocol. Harout also acknowledges the assurance that RNAseq will be initiated with timelines to be announced.
- **Concerns About Marginalization:**
 - Harout expresses concern about being marginalized from the HIV project, despite repeated offers to contribute. This points to a pattern of exclusion that may be related to retaliation.
- **Publication and TDG Requirements:**
 - Harout emphasizes the importance of adhering to UCLA Technology Development Group (TDG) requirements, which advise against publishing work before discussing it with TDG. He requests a meeting to discuss these requirements and other related matters before the lab meeting.
- **Request for Meeting:**
 - Harout requests an in-person meeting to discuss these issues and expresses flexibility regarding his availability.

Significance and Questions Raised:

- **Credit and Marginalization:**
 - The email reflects Harout's ongoing effort to ensure proper credit for his discovery and protocol while addressing his concerns about being sidelined from key projects. This highlights potential retaliatory behavior through exclusion from important research.
- **Compliance with TDG Requirements:**
 - Harout's emphasis on TDG requirements and his request for a meeting before publishing reflect his adherence to protocol and desire to ensure compliance, further suggesting that any retaliatory actions might be connected to his adherence to these regulations.

Evidence Quotation:

- “Thank you for verbally memorializing to Cendi and others in lab on Wednesday that only you and I will be credited with my discovery of using SB590885 for cerebral organoid formation, along with the unique cerebral organoid protocol I created.”
- “I have been marginalized, and am not sure why I am being excluded.”
- “I think before doing so we should further focus as to the requirements of UCLA Technology Development Group emphasizes to ‘refrain from publishing your work before you have an opportunity to discuss it with someone from TDG’.”

Source: Email from Harout Gulesserian to Bennett Novitch, dated January 20, 2024, 6:43 AM.



- Move to...

From: Harout Dullessarlian

Request to meet
Re: BENNETT ADVISORY

January 25, 2024 at 8:43 AM

Hi Ben,

Thank you for verbally memorializing to Cendi and others in lab on Wednesday that only you and I will be credited with my discovery of using SB100985 for cerebral organoid formation, along with the unique cerebral organoid protocol I created. Moreover, thank you for reassuring me that the RNAseq will be initiated with timeliness to be announced at our next meeting.

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 old, I have been marginalized, and am not sure why I am being excluded. I have repeatedly offered to do anything necessary to further the research.

With respect to my discovery/protocol: Granted that I am willing, ready, and able to draft, compose, and disseminate published material for the group and any others who plan to be incorporated in advancing my discovery. I think before doing so we should further focus as to the requirements of UCLA Technology Development Group emphasizes to "halten from publishing your work before you have an opportunity to discuss it with someone from TDDG".

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.

I look forward to discussing these matters with you in person. As far as availability for a meeting, I will be in lab today, Sunday, and Monday. Whatever time works best for you to meet also works best for me.

I look forward to hearing from you.

Harout

Summary of Evidence: Email from Bennett Novitch to Harout Gulessarian

Email Details:

- **Sender:** Bennett Novitch
- **Recipient:** Harout Gulessarian
- **Date and Time:** January 20, 2024, 3:04 PM

Context and Content:

- **Discussion of TDG and Publication:**
 - Bennett discusses the need to compile data and prepare figures for a publication. He emphasizes the complexities of working with UCLA TDG, including high standards for novelty, pre-existing patents, and the university's ownership of inventions.
 - Bennett notes that TDG is more interested in new compounds rather than methods, which might affect the approach to research and publication.
- **Marginalization Concerns:**
 - Bennett addresses Harout's concerns about being marginalized from the HIV project. He explains that Jessie prefers to handle cell culture herself but acknowledges that Harout might be able to help with other aspects.
 - Bennett mentions the upcoming rotation student, Emily Hanson, who will assist with microglia projects, and plans to distribute tasks among lab members.
- **Invitation to Present and Discuss:**
 - Bennett invites Harout to present a synopsis of his efforts and discuss improvements in organoid experiments during the lab's subgroup meeting.

Significance and Questions Raised:

- **Complexity of TDG and Publication:**
 - Bennett's detailed explanation of TDG's requirements and the complexities of invention filings indicates the bureaucratic hurdles Harout faces. This highlights additional stressors related to Harout's whistleblowing and the need to navigate these complexities.
- **Marginalization and Task Distribution:**
 - Bennett's response regarding Harout's marginalization in the HIV project and his approach to distributing tasks among lab members suggests an attempt to address Harout's concerns. The mention of Emily Hanson and the redistribution of tasks may indicate efforts to manage lab resources and personnel in response to Harout's feedback but continues to marginalize Harout in that project while Emily and others were able to meaningfully participate Harout continued to be sidelined.
- **Invitation to Present:**
 - The invitation for Harout to present his work indicates that this work did not exist in the lab prior to Harout's discovery/invention.

Evidence Quotation:

- “I had not realized that you felt marginalized in your participation.”
- “We do have a new rotation student, Emily Hanson... and I am planning on incorporating her into some of the experiments.”
- “Would you be willing to present a synopsis of your efforts so that we can discuss?”

Source: Email from Bennett Novitch to Harout Gulessarian, dated January 20, 2024, 3:04 PM.

 BENNETT NOVITCH
Re: Request to meet
To: Harout Gulessarian

(January 20, 2024 at 3:04 PM)

Hi Harout,

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.

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 invention report. You should be aware that the bar for UCLA supporting such efforts is higher than you might think. I talked to them about the AG 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 organoid and stem-cell differentiation methods, so there is a lot of navigation that would be required in demonstrating how this finding is distinct from others. You also need to know that any "inventions" that we make at 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.

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 mechanisms 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.

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 not feeling 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.

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 Adrian, 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 ten so that we can have a catch-up and go over the assignments again.

Returning to the start of my response, 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 (probability 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

[See More from HAROUT GULESSARIAN](#)

Summary of Evidence: Email from Harout Gulessarian to Bennett Novitch

Email Details:

- **Sender:** Harout Gulessarian
- **Recipient:** Bennett Novitch
- **Date and Time:** January 22, 2024, 8:53 AM

Context and Content:

- **Acknowledgment of Credit and Marginalization Concerns:**
 - Harout expresses gratitude to Bennett for ensuring that he receives proper credit for his discovery and the creation of the protocol. He highlights how meaningful this acknowledgment is, given his ongoing experience of marginalization and exclusion from significant opportunities, particularly regarding the HIV research project.
- **Confidentiality and Economic Value of Protocol:**
 - Harout asserts that the protocol he created has independent economic value due to its confidentiality and the potential economic benefit from its disclosure. He emphasizes the importance of maintaining confidentiality until cleared by the UCLA Technology Development Group (TDG) to avoid any potential misappropriation.
- **Proposal for TDG Advisory Guidance:**
 - Harout proposes waiting for TDG's advisory guidance to ensure compliance with UCLA's best practices and protect against any potential misappropriation. He acknowledges Bennett's past experiences with TDG but suggests that TDG's case-by-case approach and regularly updated policies make it prudent to seek their advice.
- **Discussion of HIV Project and Group Cohesion:**
 - Harout suggests discussing the HIV project and the need for improved inclusiveness and cohesion within the lab. He emphasizes the importance of making all lab members feel included and welcomed.
- **Meeting Proposal:**
 - Harout proposes meeting the following evening to discuss the HIV project and prepare for the upcoming meeting with the Spencer/Pyle lab. He indicates that he will use the additional time to compile meaningful data.

Significance and Questions Raised:

- **Credit and Marginalization:**
 - Harout's acknowledgment of Bennett's assurance about credit and his concerns about marginalization illustrate ongoing issues with inclusion and recognition within the lab. This highlights the broader context of retaliation and exclusion that Harout is experiencing.

- **Confidentiality and Economic Value:**
 - Harout's emphasis on the economic value of his protocol and the need for confidentiality underscores the importance of protecting intellectual property and adhering to TDG policies. This aligns with his concerns about potential misappropriation and reinforces his adherence to best practices.
- **Need for TDG Guidance:**
 - Harout's proposal to seek TDG's advisory guidance reflects his commitment to following proper procedures and ensuring compliance with UCLA's policies, further emphasizing his proactive approach to managing intellectual property and addressing potential issues.
- **Group Cohesion and Inclusiveness:**
 - The suggestion to discuss the HIV project and improve group cohesion highlights Harout's concerns about lab dynamics and the impact of exclusion on his experience and contributions.

Evidence Quotation:

- “I am extremely grateful to you for making sure I get my credit for discovering the usage of the molecule & creating the protocol.”
- “I am grateful for your reassurance that there will be no misappropriation of my creations, especially from people who have maintained a pattern and practice of marginalization and non-inclusiveness.”
- “I believe it’s important for all of us in lab to feel inclusive, and welcomed at the end of the day.”

Source: Email from Harout Gulessserian to Bennett Novitch, dated January 22, 2024, 8:53 AM.

From: Harout Gulessserian
Re: Request to meet
To: bennett.novitch

January 22, 2024 at 8:53 AM

Hello Ben,

I am sorry to hear you are under it with you a speedy recovery and hope to see you in lab very soon. Unfortunately, I am also feeling a bit under myself and would not mind if we meet later in the week. I may also need to step away from lab today after meeting Eric's oncologist to take care of myself.

I am extremely grateful to you for making sure I get my credit for discovering the usage of the molecule & creating the protocol, perhaps you can now understand how much more meaningful that was when you said that, especially given the ongoing anxiety from being marginalized, as members of the lab are continuously non-inclusive making sure that I am denied meaningful opportunities on projects such as the HIV research. Therefore, I am grateful for your reassurance that there will be no misappropriation of my creations, especially from people who have maintained a pattern and practice of marginalization and non-inclusiveness at me.

Regarding any information, including the formula, or method of my technique, I believe that the protocol I created, even now as it stands, with nothing more added to the formula/technique, 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).

That being said, I believe efforts are reasonable to maintain confidential my creations at least until my creations/method are cleared for non-confidential disclosure by TDG because I believe this is fully TDG/UCLA policy as TDG's main goal is likely how to best protect UCLA's interests.

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.

Certainly I can appreciate your past efforts with TDG regarding eICL, but given TDG handles matters on a case by case system and given laws, rules, and policies are frequently amended and get updated regularly, perhaps I can propose that maybe TDG is best suited to insure we are moving forward with UCLA best practices whatever those may be.

I think that we should further discuss the HIV project in person, along with focusing on reconciliation and somehow becoming more inclusive & cohesive as a group. I believe it's important for all of us in lab to feel inclusive, and welcomed at the end of the day.

I look forward to meeting with you once both of us have recovered. We have an upcoming meeting with the SpencerPyle 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.

Hope you feel better soon,

Harout

[See More from BENNETT NOVITCH](#)

Summary of Evidence: Email from Bennett Novitch to Harout Gulessarian

Email Details:

- **Sender:** Bennett Novitch
- **Recipient:** Harout Gulessarian
- **Date and Time:** January 22, 2024, 9:57 AM

Context and Content:

- **Scheduling Discussion:**
 - Bennett acknowledges that there are many topics to cover and suggests waiting until their conversation to address them. He proposes talking tomorrow evening, noting that he has a commitment at 7:30 PM but is available afterward.
- **Organoid Subgroup Meeting:**
 - Bennett invites Harout to join the organoid subgroup meeting via Zoom. He indicates that if Harout cannot attend, it may be best to postpone the meeting since Bennett is not feeling his best and some of Harout's work will be discussed.
- **Concerns About Inclusivity:**
 - Bennett expresses a willingness to address Harout's concerns about inclusivity. He suggests that Harout's exclusion from certain projects may be due to concerns about workload and assures Harout that he is valued and wanted in the lab.

Significance and Questions Raised:

- **Scheduling and Communication:**
 - Bennett's proposal to discuss various issues during their conversation and his flexibility with timing indicate a willingness to engage with Harout's concerns. The rescheduling of the meeting may reflect Bennett's commitment to having a meaningful discussion despite current challenges.
- **Organoid Subgroup Meeting:**
 - The invitation to the organoid subgroup meeting and the suggestion to postpone if Harout cannot attend highlight the collaborative nature of the lab and the importance of Harout's contributions to the discussion.
- **Inclusivity Concerns:**
 - Bennett's acknowledgment of Harout's concerns about inclusivity and his assurance that Harout is wanted in the lab aim to address Harout's feelings of marginalization. Bennett's explanation regarding workload concerns and his positive comments about Harout's value in the lab are intended to reassure Harout.

Evidence Quotation:

- “I hope we can address your concerns about inclusivity, as there is no reason why you cannot be participating in these different projects.”
- “I can't imagine that anyone would not want you helping!”

Source: Email from Bennett Novitch to Harout Gulessarian, dated January 22, 2024, 9:57 AM.

Found in inbox - iCloud Mailbox

BENNETT NOVITCH
Re: Request to meet
To: Harout Gulessarian

January 22, 2024 at 9:57 AM

Hi Harout,

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

[See More from HAROUT GULESSERIAN](#)

Summary of Evidence: Email from Harout Gulessarian to Bennett Novitch

Email Details:

- **Sender:** Harout Gulessarian
- **Recipient:** Bennett Novitch
- **Date:** January 24, 2024

Context and Content:

- **Links Provided:**
 - Harout provides several links to resources:
 - [Link 1](#)
 - [Link 2](#)
 - An additional link:
<https://ucla.box.com/s/pwnj7xdc9viexj4xgsvxt3q5aaphepi>
- **Request for Meeting:**
 - Harout asks Bennett when they can meet to discuss several important topics, including:
 - The Feeder-free protocol he created.
 - The usage of the SB590885 molecule.
 - The timeline for RNA sequencing (RNAseq).

Significance and Questions Raised:

- **Links to Resources:**
 - Harout's provision of links suggests that he is sharing relevant documents or data related to his work on the Feeder-free protocol and the SB590885 molecule. This indicates ongoing progress and the need for review and discussion.
- **Request for Meeting:**
 - The request to meet emphasizes the importance of discussing his contributions and the next steps for RNA sequencing. It highlights Harout's proactive approach in seeking feedback and coordination regarding his research.

Evidence Quotation:

- “When can you and I meet to discuss my creations of the Feeder-free protocol, the usage of the SB590885 molecule, and a RNAseq timeline?”

Source: Email from Harout Gulessarian to Bennett Novitch, dated January 24, 2024.

 Harout Gulesserian
Re: Meeting
To: BENNETT NOVITCH; Cc: bnovitch@ucla.edu

January 26, 2024 at 17:56 PM

[Details](#)

Hi Ben,

Hope you recovered from Covid!

Heres the link: <https://ucla.box.com/s/bwns7xodvive4kgznd3o5eacheo>

Link 1: <https://ucla.box.com/s/l65nrt10sl5azk0kheu4t2avsd05w>
Link 2: <https://ucla.box.com/s/lekcq2jcmr96mzaehenox671tsq>

When can you and I meet to discuss my creations of the Feeder-free protocol, the usage of the SB590885 molecule, and a RNAseq timeline?

Harout

[See More from BENNETT NOVITCH](#)

 BENNETT NOVITCH
Re: Meeting
To: Harout Gulesserian; Cc: Bennett Novitch

January 24, 2024 at 1:00 PM

[Details](#)

If you want to talk over zoom, I can probably do it any time this afternoon before 5:15. I'm am in office, but have some lingering covid positivity, and so I'm still trying to stay clear of people as much as I can. I'm feeling much better however. Assuming that I am well enough to come in tomorrow, before lab meeting, or before or after our oxygenation project meeting (with the Lin lab at 2pm) would also be ok.

[See More from HAROUT GULESSERIAN](#)

Summary of Evidence: Email from Harout Gulessarian to Bennett Novitch

Email Details:

- **Sender:** Harout Gulessarian
- **Recipient:** Bennett Novitch
- **Date and Time:** January 26, 2024, 11:19 AM

Context and Content:

- **Meeting Availability:**
 - Harout suggests meeting with Bennett on Monday evening via Zoom, acknowledging that Bennett's schedule may be busy with multiple meetings. He also offers Tuesday as an alternative if it works better.
- **Preparation for Subgroup Meeting:**
 - Harout inquires about the topics to be covered in the upcoming organoid subgroup meeting. He requests information on subjects beyond his Feeder-free protocol to better prepare for the discussion.

Significance and Questions Raised:

- **Scheduling Flexibility:**
 - Harout's flexibility with scheduling demonstrates his willingness to accommodate Bennett's availability and his proactive approach to organizing a productive meeting.
- **Preparation for Discussion:**
 - Harout's request for information on the topics to be covered in the organoid subgroup meeting indicates his commitment to being well-prepared and contributing effectively to the discussion.

Evidence Quotation:

- “I am open to meeting Monday evening over zoom if you have the capacity to do so.”
- “Do you have an idea of what topics you want to cover with the organoid subgroup outside of my Feeder-free protocol so I can be better prepared for Tuesday?”

Source: Email from Harout Gulessarian to Bennett Novitch, dated January 26, 2024, 11:19 AM.

 Unable to verify message signature

? Show Details

BN

BENNETT NOVITCH

Re: Reschedule meeting
To: Harout Gulessserian

January 26, 2024 at 8:55 AM

Hi Harout,

It looks like I am completely booked with meetings all day on Monday (7 of them!). Tuesday is not a lot better. I might be able to carve out a little time from 10-11am if Eric isn't claiming that time to speak with me this week (we have a loose arrangement to speak every few weeks at that time). I can probably bump him nevertheless. It would be preferable to talk before our organoid subgroup meeting on Tuesday, so we could try to do this Tuesday AM time. Otherwise, we could try to talk over zoom Monday evening or during the weekend (Sunday night?).

While it would be after our scheduled organoid subgroup meeting on Tuesday, I will have time to talk on Wednesday between 9-2pm. Though as it's the donor visit for Samantha, I'm trying to keep my schedule flexible in case I am needed to join into their discussion. I think that "safe times" to plan for might be 9-10am or 1-2pm, though subject to change at the last minute depending on how the donor visit goes.

Let me know what works for you.

Ben

[See More from HAROUT GULESSERIAN](#)

HG

Harout Gulessserian
Re: Reschedule meeting
To: BENNETT NOVITCH

January 26, 2024 at 11:19 AM

Hi Ben,

I am open to meeting Monday evening over zoom if you have the capacity to do so. Seven meetings in a day sounds hectic! If that does not work, Tuesday for an hour would work also if the time permits.

Do you have an idea of what topics you want to cover with the organoid subgroup outside of my Feeder-free protocol so I can be better prepared for Tuesday.

Harout

[See More from BENNETT NOVITCH](#)

Summary of Evidence: Meeting Invitation from Bennett Novitch to Harout Gulessarian

Email Details:

- **Sender:** Bennett Novitch
- **Recipient:** Harout Gulessarian
- **Date and Time:** January 30, 2024, 2:06 PM

Context and Content:

- **Meeting Invitation:**
 - Bennett invites Harout to a scheduled Zoom meeting for the **Organoid Subgroup Meetings**.
 - **Time:** The meeting is recurring and can be joined at any time.
 - **Zoom Meeting Link:** [Join Zoom Meeting](#)
 - **Meeting ID:** 984 4599 8393
 - **Passcode:** 133552

Significance and Questions Raised:

- **Meeting:**
 - This invitation is proof of the January 30th meeting that took place it was via Zoom, UCLA CIPO was put on notice about this meeting as well via a bcc email.

Evidence Quotation:

- “Topic: Organoid Subgroup Meetings”
- “Join Zoom Meeting: [Link](#)”

Source: Email from Bennett Novitch to Harout Gulessarian, dated January 30, 2024, 2:06 PM.



BENNETT NOVITCH

(No Subject)

To: Harput Gulesserian

Inbox - iCloud January 30, 2024 at 2:08 PM

Ben Novitch is inviting you to a scheduled Zoom meeting.

Topic: Organoid Subgroup Meetings

Time: This is a recurring meeting Meet anytime

Join Zoom Meeting

<https://usa.zoom.us/j/98445998393?pwd=MGJ5Qm1Ty1rO0hrtkycFRVNlRwUT09>

Meeting ID: 984 4599 8393

Passcode: 133552

—

One tap mobile
+16692192599,,98445998393#,...,"133552# US (San Jose)
+12133388477,,98445998393#,...,"133552# US (Los Angeles)

—

Dial by your location

- +1 669 219 2599 US (San Jose)
- +1 213 338 8477 US (Los Angeles)
- +1 602 753 0140 US (Phoenix)
- +1 720 928 9299 US (Denver)
- +1 971 247 1195 US (Portland)
- +1 253 215 8782 US (Tacoma)
- +1 346 248 7799 US (Houston)
- +1 312 626 6799 US (Chicago)
- +1 470 250 9358 US (Atlanta)
- +1 646 558 8656 US (New York)
- +1 651 372 8299 US (Minnesota)
- +1 786 635 1003 US (Miami)
- +1 301 715 8592 US (Washington DC)

Meeting ID: 984 4599 8393

Passcode: 133552

Find your local number: <https://usa.zoom.us/u/adWtTgYzU>

—

Join by SIP

- 98445998393@zoomcrc.com

—

Join by H.323

- 162.255.37.11 (US West)

Summary of In-Person Encounters with Bennett Novitch

Dates: January 25 and January 30, 2024

Participants: Harout Gulessarian and Bennett Novitch

Location: In-person meetings

January 25, 2024

Encounter Details:

- **Discussion:** Harout raised concerns about the potential misappropriation of his protocol and the importance of protecting his intellectual property.
- **Bennett's Response:** Bennett dismissed these concerns, stating that Harout's fears of misappropriation were "all in his head." This response appeared to minimize the validity of Harout's apprehensions and did not address the importance of IP protection as outlined by UCLA's policies. These harmful comments were also reported to UCLA confidential counselling on numerous occasions.

Significance:

- **Dismissal of Concerns:** Bennett's response may have conveyed a lack of acknowledgment of Harout's genuine concerns. This dismissal potentially undermined Harout's efforts to ensure that his intellectual property was protected according to institutional guidelines.

January 30, 2024

Encounter Details:

- **Discussion:** Harout reiterated his concerns about IP misappropriation and the necessity of adhering to UCLA's procedures for protecting his protocol.
- **Bennett's Response:** Bennett again stated that Harout's concerns about misappropriation were "all in his head." This repeated dismissal suggested a continued disregard for the importance of IP protection, all while making discriminatory comments towards Harout.
- **Closing Statement:** After the lab meeting concluded and everyone else had left, Bennett remarked, "No one has screwed you over yet." This statement appeared to downplay Harout's concerns about potential harm and implied that no significant issues had occurred to justify his apprehensions, but later continued to mislead Harout about university guidelines and procedures.

Significance:

- **Dismissal and Minimization:** Bennett's statements on both January 25 and January 30 reflected a persistent dismissal of Harout's concerns. The use of the phrase "all in his head" and the closing remark "No one has screwed you over yet" may have not only undermined Harout's legitimate concerns but also contributed to feelings of invalidation and frustration as Ben Novitch was making discriminatory comments about Harout's mental health.
- **Potential Discrimination Concerns:** The repeated minimization of Harout's concerns, particularly if he has a mental health disability, raises potential issues of disability discrimination. Dismissing concerns related to mental health or intellectual property can be viewed as a lack of accommodation or understanding, potentially affecting Harout's ability to feel supported and valued within the lab environment.

Evidence Quotations:

- January 25: The misappropriation fears are "all in your head."
- January 30: The misappropriation fears you're having are "all in your head." and "No one has screwed you over yet."

Summary: The in-person encounters on January 25 and 30 highlight a concerning pattern of dismissive responses from Bennett regarding Harout's legitimate concerns about intellectual property and potential misappropriation. This pattern of response may contribute to ongoing tension, miscommunication, and potential issues of discrimination related to mental health, affecting the collaborative dynamics and support within the lab.

Summary of Evidence: Communication from Harout Gulessarian Regarding Protocol Confidentiality

Email Details:

- **Sender:** Harout Gulessarian
- **Recipient:** Bennett Novitch
- **Cc:** Various lab members (listed below)
- **Bcc:** Charanjit Arora (TDG)
- **Date:** January 30, 2024

Context and Content:

- **Recipient List:**
 - **To:** Bennett Novitch
 - **Cc:** Negien Shalmani, Eric Heinrichs, Sangmok Kim, Natella Baliaouri, Lauren Choi, Cendi Ling, Ivan Pavlovic, Fu Ting, Jessie Buth, Erick Nedd, Maria L Caballero, Angel Emodi, Diana Ibrahim
 - **Bcc:** Charanjit Arora (TDG)
- **Subject:**
 - **Protocol Confidentiality Reminder**
- **Key Points:**
 - **Disclosure Context:**
 - Harout refers to the disclosure of his protocol at the 2:00 PM lab meeting earlier that day.
 - **Confidentiality Reminder:**
 - Harout reiterates the importance of maintaining confidentiality as advised by UCLA's Technology Development Group (TDG).
 - He emphasizes that internal discussions about his protocol are confidential and must be protected to ensure IP rights and potential commercialization are upheld.
 - **Notification Requirement:**
 - Harout requests that any plans to share his protocol with external parties or within UCLA be communicated to him and TDG prior to disclosure. This is to comply with TDG's requirements for protecting intellectual property.
 - **Request for Cooperation:**
 - Harout stresses the need for prompt attention and cooperation from all recipients to safeguard his research and intellectual property.

Significance and Questions Raised:

- **Adherence to IP Policies:**
 - The communication underscores the necessity of following UCLA's TDG guidelines for IP protection, reflecting Harout's concern for proper management of his intellectual property.
- **Immediate Response:**

- The timing and recipients of this email indicate Harout's proactive approach to ensuring that his protocol remains confidential and protected following its disclosure.

Evidence Quotation:

- "TDG basically indicated that discussing my protocol outside of the lab may have implications for IP protection and the commercialization of my ideas."

Source: Email from Harout Gulessarian to Bennett Novitch, dated January 30, 2024.

Reply to sender of selected message

IP disclosure

To: BENNETT NOVITCH
Cc: Negien Shalmani, ERIC HEINRICH, Sangmin Kim, Natalia Italiouri, Lauren Choi, Cendi Ling, Ivan Pavlović, FU Ting, Jessie Butch, Erick Nedd, Maria L Caballero, Angel Emadi, Diana Ibrahim, BENNETT NOVITCH
Bcc: Charanji 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> wrote:
In the conference room.
See you then.
Ben
Sent from my iPhone

Summary of Evidence: Slack Message

Slack Message from Natella Baliaouri

Message Details:

- **Content:** “Harout Please send out the protocol Or else I will have to steal it somehow”
- **Date and Time:** February 6, 2024, 5:58 AM

Context and Significance:

- **One Reason for Whistleblowing:**
 - This Slack message represents a direct threat to unlawfully obtain a protocol developed by Harout Gulessarian. The threat to steal the protocol highlights a significant concern related to the misappropriation of Harout’s intellectual property. To steal something means that it was not available to the lab, indicating that it was a new invention/creation within the lab.
- **Questions Raised:**
 - **Availability of Protocol:**
 - The threat to steal the protocol raises a critical question: if the protocol was already established in the lab, why would there be a threat to steal it? This question indicates that the protocol was not available within the lab's inventory prior to Harout's disclosure.
 - **Ownership and Access:**
 - The protocol and discovery of the molecule were exclusively developed by Harout and disclosed only to the UCLA Technology Development Group (TDG). Bennett obtained the protocol through the TDG office, not directly from Harout. This suggests that the protocol was not previously available in the lab and was not accessible to other lab members. The need to steal it confirms that it was Harout’s intellectual property and was uniquely his, rather than being part of the lab’s existing resources.

Evidence Quotation:

- “Harout Please send out the protocol Or else I will have to steal it somehow”

Source: Slack message from Natella Baliaouri to Harout Gulessarian, dated February 6, 2024.

Feb 6th



Natella Baliaouri 5:58 AM

Harout

Please send out the protocol

Or else I will have to steal it somehow

Summary of Evidence: IP Disclosure Communication

Email Details:

- **Sender:** Harout Gulessrian
- **Recipient:** Bennett Novitch
- **Cc:** Various lab members
- **Date:** February 19, 2024

Recipient List:

- **To:** Bennett Novitch
- **Cc:** Negien Shalmani, Eric Heinrichs, Sangmok Kim, Natella Baliaouri, Lauren Choi, Cendi Ling, Ivan Pavlovic, Fu Ting, Jessie Buth, Erick Nedd, Maria L Caballero, Angel Emodi, Diana Ibrahim

Subject:

- IP Disclosure

Content and Key Points:

Update on Protocol Disclosure:

- Harout informs Bennett and the lab members about ongoing developments regarding the protocol.
- He mentions that discussions with UCLA's Technology Development Group (TDG) are still in progress and emphasizes the importance of adhering to their guidelines.

Guidance from TDG:

- The Associate Vice Chancellor and CEO & President of TDG have advised against publishing the work until a discussion with TDG has taken place.
- The Chief Intellectual Property Officer has emphasized that discussing the protocol outside the lab might compromise IP protection and commercialization.

Request for Responses:

- Harout requests that lab members interested in accessing the protocol respond to his email.

Significance and Questions Raised:

Compliance with IP Guidelines:

- The email highlights the necessity of following TDG's guidelines to protect intellectual property.
- Harout's emphasis on confidentiality reflects a proactive approach to safeguarding his research and ensuring adherence to legal protocols.

Coordination with TDG:

- By requesting responses from lab members, Harout is facilitating coordination with TDG to effectively manage IP disclosure.

Evidence Quotation:

- “The Associate Vice Chancellor indicated that I refrain from publishing my work before I have an opportunity to discuss it with TDG.”
- “The Chief Intellectual Property Officer has underscored that discussing the protocol outside of the lab may hinder IP protection and commercialization of my idea.”

Source: Email from Harout Gulessserian to Bennett Novitch and lab members, dated February 19, 2024.

The screenshot shows an email from Harout Gulessserian to Bennett Novitch and lab members. The email is dated February 19, 2024, at 10:37 PM. It discusses the necessity of following TDG's guidelines to protect intellectual property and the importance of confidentiality. The email also mentions the Associate Vice Chancellor and the Chief Intellectual Property Officer. The message is signed off by Harout.

From: Harout Gulessserian
Re: IP disclosure
To: BENNETT NOVITCH
Cc: Negien Shalmani, ERIC HEINRICH, Sangmok Kim, Natella Ballaburi, Lauren Choi, Cendi Ling, Ivan Pavlovic, FU Ting, Jessie Butch, Erick Nedd, Maria L Caballero, Angel Emodi, Diana Ibrahim, BENNETT NOVITCH

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 GULESSERIAN](#)

Summary of Evidence: Response to IP Disclosure

Email Details:

- **Sender:** Bennett Novitch
- **Recipient:** Harout Gulessarian
- **Date:** February 19, 2024
- **Time:** 11:49 PM

Content and Key Points:

Request for TDG Communication Involvement:

- Bennett requests to be included in conversations with the UCLA Technology Development Group (TDG).
- This request comes after Harout had already shared the protocol with the lab members on January 30, 2024, and communicated the importance of TDG's involvement and confidentiality.

Contradiction and Misrepresentation:

- Bennett's request for information and involvement in discussions with TDG contradicts his earlier stance. He had previously been informed that discussions about the protocol should be coordinated with TDG to ensure proper IP protection.
- Bennett's current insistence on accessing the protocol and the perceived withholding of information implies a misrepresentation of the facts, as the protocol was already shared with the lab members in late January. This suggests a pattern of making misleading deceptive comments.

Pressure and Concerns:

- Bennett expresses dissatisfaction with Harout's alleged withholding of information, despite the protocol being disclosed to the lab as of January 30, 2024.
- Bennett's pressure to share details about the protocol and his insistence on discussing the methods and results publicly seem to escalate concerns about IP protection and TDG involvement. This pressure appears to be a new development, suggesting a shift in Bennett's stance or an evolving concern about the protocol's disclosure.

Meeting Schedule and Agenda:

- Bennett confirms a meeting scheduled for 1 PM the following day and notes a reduced timeframe due to a change in the Lin lab meeting schedule.
- He proposes using this meeting to review Harout's data, discuss potential figures, and prioritize further experiments, which underscores the urgency Bennett feels regarding the protocol and research progress.

Evidence Quotation:

- “Who are you talking to at TDG? I would like to be 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.”
- “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.”

Source: Email from Bennett Novitch to Harout Gulessarian, dated February 19, 2024, 11:49 PM.

■ Found in Inbox - iCloud Mailbox

BENNETT NOVITCH
Re: IP disclosure
To: Harout Gulessarian

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 GULESSARIAN](#)

Summary of Evidence: Response to Concerns about Protocol Disclosure

Email Details:

- **Sender:** Harout Gulessrian
- **Recipient:** Bennett Novitch
- **Date:** February 20, 2024
- **Time:** 4:20 AM

Content and Key Points:

Meeting Agenda and Inclusiveness:

- Harout expresses anticipation for the upcoming meeting and highlights the need to address ongoing issues of non-inclusiveness in the lab, particularly regarding the HIV project. He refers to previous discussions about improving inclusivity and expresses a desire to be given meaningful opportunities.

Clarification on Protocol Disclosure:

- Harout addresses Bennett's concern about "holding back" information, clarifying that the protocol was disclosed to the lab on January 30, 2024. He argues that his actions have been transparent and that there has been no intentional withholding of information.

Adherence to UCLA Best Practices:

- Harout emphasizes his commitment to protecting UCLA's legal interests by following the guidelines provided by UCLA's Technology Development Group (TDG). He reiterates that involving TDG aligns with UCLA's best practices and legal procedures for intellectual property protection.

Past Communication and Availability:

- Harout mentions previous attempts to meet with Bennett regarding the protocol, highlighting difficulties due to Bennett's busy schedule. He emphasizes that he has been diligent in attempting to disclose his work and adhere to UCLA's protocols for protecting intellectual property.

Acceleration of Disclosure:

- Harout defends his approach by asserting that involving TDG is not delaying the process but rather ensuring that disclosure and research follow proper procedures. He believes that this approach aligns with UCLA policies and accelerates the process of bringing his discovery to market.

Evidence Quotation:

- “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.”
- “I am also trying to ensure 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.”
- “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.”

Source: Email from Harout Gulessserian to Bennett Novitch, dated February 20, 2024, 4:20 AM.

From: Found in Sent - Gmail Mailbox

Harout Gulessserian

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 UCAs 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](#)

Summary of Evidence: Request for Access to Protocol

Email Details:

- **Sender:** Natella Baliaouri
- **Recipient:** Harout Gulessarian and Bennett Novitch
- **Date:** February 20, 2024

Content and Key Points:

Interest in Testing Protocol:

- Natella Baliaouri expresses interest in testing Harout's protocol on her lines, noting that it would help speed up organoid production.
- She thanks Harout for his help in the lab.

Evidence Quotation:

- “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!”

Source: Email from Natella Baliaouri to Harout Gulessarian and Bennett Novitch, dated February 20, 2024.

Email Details:

- **Sender:** Cendi Ling
- **Recipient:** Harout Gulessarian
- **Date:** February 20, 2024 (and February 21, 2024)

Content and Key Points:

Interest in Accessing Protocol:

- Cendi Ling expresses interest in gaining access to Harout's protocol, believing it would greatly benefit their work.
- She requests to know if any additional steps are required from her side to proceed.

Evidence Quotation:

- "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!"

Source: Email from Cendi Ling to Harout Gulessarian, dated February 20 and February 21, 2024.

The image displays two screenshots of emails from the iPhone Mail app. Both emails are from the same conversation between Cendi Ling (CL) and Harout Gulessarian (HG).

Email 1 (February 20, 2024):

- From:** NB NATELLA VAHKTANGOVNA BALIAOURI
- To:** Harout Gulessarian, BENNETT NOVITCH
- Date:** February 20, 2024 at 10:17 AM
- Text:** 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 GULESSARIAN](#)
- Signature:** Natella Baliaouri
NSIDP Graduate Student
UCLA

Email 2 (February 21, 2024):

- From:** CL CENDI LING
- To:** Harout Gulessarian, BENNETT NOVITCH
- Date:** February 21, 2024 at 12:06 PM
- Text:** 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!
- Signature:** Best,
Cendi
[See More from HAROUT GULESSARIAN](#)

Summary of Incident: In-Person Confrontation and Apology Request

Date:

- February 21, 2024

Incident Overview:

- **Location:** In-person meeting with Bennett Novitch

Key Points:

Confrontation:

- Ben was visibly angry about the emails sent by Natella Baliaouri and Cendi Ling, both expressing interest in accessing Harout's protocol.
- Ben's reaction was intense, and he explicitly told Harout that he needed to send an apology email to the lab.

Harout's Response:

- Harout objected to Ben's statements, arguing that his actions and communications were in line with best practices for IP protection and transparency.
- Harout defended his stance that he was not withholding information but was following necessary protocols to ensure proper legal and intellectual property protections.

Evidence Quotation:

- Ben's directive: Harout “needs to email the lab and apologize for what [he] stated.”

Significance:

- This confrontation may reflect broader issues related to lab dynamics, communication practices, and the handling of intellectual property.

In-Person Meeting Hardcore Retaliation

Date: February 23, 2024, 3:30pm

Encounter Details:

- **Behavior:** During the meeting, Bennett exhibited hostile and angry behavior towards Harout, including teeth grinding and disruptive actions including but not limited to cursing and stating “I don’t give a shit” about policy. Harout felt intimidated and had to repeatedly ask Bennett to calm down as Harout started to have a panic attack and began to shake.
- **Apology:** After the meeting, Bennett sent an apology email to Harout’s CSUN account, acknowledging his inappropriate behavior.

Significance:

- **Hostile Environment:** Bennett’s behavior during the meeting created a highly uncomfortable and intimidating atmosphere for Harout, affecting their ability to discuss issues effectively causing extreme mental distress onto Harout.
- **Acknowledgment of Behavior:** Bennett’s apology acknowledges his hostile behavior, though it does not address the underlying issues or concerns raised by Harout during their discussion.

Evidence Quotations:

- **Email:** “It is very important to know whether you were able to secure some bottles of GMEM from Aparna’s lab because I need them over the weekend to feed.”
- **In-Person Meeting:** Description of Bennett’s hostile behavior, including teeth grinding and disruptive actions, and Harout’s experience of intimidation.

Summary: The email from February 23, 2024, reveals Harout’s urgent needs related to media and his ongoing concerns about exclusion from the HIV project. The subsequent in-person meeting demonstrated Bennett’s hostile behavior, creating an intimidating environment for Harout. Bennett’s apology after the meeting acknowledged his behavior but did not address the underlying issues affecting their professional relationship and collaboration.

In the email dated February 23, 2024, Bennett Novitch acknowledges the previous incident where he displayed hostile behavior. Here’s a refined summary and analysis for your memorandum:

Analysis of Hostile Behavior Admission

Admission of Hostile Behavior

In the email dated February 23, 2024, Bennett Novitch demonstrates an awareness of his own hostile behavior following his abusive behavior towards Harout Gulessarian. The email explicitly mentions this acknowledgment:

- **Hostile Interaction Acknowledgment:**
 - Bennett states, “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.” This statement admits that the conversation was heated and implies that Bennett recognizes his own role in the conflict.

Significance in the Context of Retaliation:

- **Acknowledgment of Conflict:**
 - The email's mention of a “heated discussion” and Bennett’s apology highlight an awareness of the contentious nature of their prior interaction. This acknowledgment is significant as it reflects an understanding of the hostile retaliatory environment that followed Harout's whistleblowing.
- **Retaliatory Behavior Implications:**
 - The admission of a heated, potentially hostile interaction, particularly after a whistleblowing event, can be seen as indicative of retaliatory behavior. The timing and tone of Bennett’s communication suggest that his reaction was influenced by the whistleblowing incident, which involved the accusation of numerous grad student attempting to steal Harout’s protocol.

Evidence Quotation:

- “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.”

Source: Email from Bennett Novitch to Harout Gulessarian, dated February 23, 2024.



Harout Gulessarian

Re: female line validation
To: BENNETT NOVITCH

February 23, 2024 at 2:48 PM



Hi Ben,

I figured you were too busy with the 1:30pm time slot, 3:30pm sounds good to meet.

Also, it is very important to know whether you were able to secure some bottles of GMEM from Apara's lab because I need them over the weekend to feed. If the bottles are not secured, what's the alternative? because my cultures need the media or they will die.

I am planning to be in all day Saturday and at minimum half a day on Sunday. If we can get the media no later than Saturday that would be great.

Lastly, I would like to discuss the ongoing issue with not being included in the HIV project. Is there any pathway for me to meaningfully participate? At the end of the day I still feel marginalized because there is zero meaningful opportunities for me to advance with the project. I know you mentioned that Jessie stated Amina's work was different in comparison with mine. I would like to bring to your attention that the only time I really was able to participate in the HIV project was when you and the team saw the quality of my astrocyte images. Outside of that I am not certain as to what data of mine is being compared with Amina's.

I'll meet you in your office at 3:30.

Harout

On Feb 23, 2024, at 11:32 AM, Harout Gulessarian <hkg80@icloud.com> wrote:

Hi Ben,

[See More](#)



Gulesserian, Harout
Fwd: Following up
To: hkg90@icloud.com

March 5, 2024 at 7:22 AM

----- Forwarded message -----

From: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Date: Friday, February 23, 2024
Subject: Following up
To: Harout Gulesserian <harout.gulesserian.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 Selena 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

Summary of Email from Bennett Novitch to Harout Gulessarian

Date: March 7, 2024

Sender: Bennett Novitch

Recipient: Harout Gulessarian

Attachments:

- <22724_HKG_TGD_APPLICATION BN.pdf>
- <Xiang et al STAR Protocols 2020 (thalamic organoids).pdf>
- <CellPress_STARProtocolsTemplate.docx>
- <s41596-018-0032-7.pdf>

Content and Key Points:

1. Comments on Protocol:

- **Document Attached:** Bennett has attached a document containing comments and feedback on Harout's protocol submission to UCLA's Technology Development Group (TDG). This document highlights several points that need revisions.
- **Feedback Focus:** The comments are intended to guide Harout in making necessary improvements to the protocol.

2. Obtaining the Protocol:

- **How Bennett Received the Protocol:** Bennett obtained the protocol from Harout's email sent on January 30, 2024, which was directed to the lab members and included Bennett. This email served as the formal disclosure of the protocol within the lab.

3. Formatting for Publication:

- **Suggested Journals:** Bennett recommends formatting the protocol with the intention of future publication in journals such as Nature Protocols or STAR Protocols, which are methods-focused. For a broader audience, Nature Methods is also mentioned, which covers methods and key findings but with less detail.
- **Attached Examples:** To aid in formatting, Bennett attached example articles and a formatting template from STAR Protocols. This is meant to help Harout understand the standard formatting and presentation used in these journals.
- **Goal:** The aim is to create a comprehensive and easily followable protocol that aligns with the standards of these journals.

4. Clarification on Misinformation:

- **Apology:** Bennett apologized for previously feeding Harout misinformation regarding Sandeep. He clarifies that the issue was related to general observations of tense lab discussions about the protocol rather than specific recent exchanges.
- **Resolution:** Bennett suggests that sharing the protocol details and encouraging feedback will help refine it and expand the data available for publication and invention reporting.

Significance:

- **Improvement and Publication:** The feedback and suggestions from Bennett emphasize the importance of refining the protocol and preparing it for potential publication, reflecting a commitment to maintaining high research standards.
- **Clarification and Apology:** Bennett's apology and clarification aim to address previous confusion and promote a constructive approach to improving the protocol.

Evidence Quotations:

- “Attached are my comments on the protocol/document that you had submitted to TDG. There are a number of notes flagging points that need fixing.”
- “It could make sense to start formatting the protocol in a manner that gets it ready for publication one day.”
- “I am very sorry for having fed you misinformation regarding Sandeep.”

Summary: Bennett's email provides detailed feedback on Harout's protocol, which was obtained from Harout's January 30, 2024, disclosure. The email includes suggestions for formatting the protocol for publication and addresses previous misinformation with an apology. The communication aims to enhance the protocol's quality and prepare it for broader dissemination while addressing any misunderstandings.

RE: BENNETT HONITCH
Comments on protocol
To: harout.saroukhani

Hi Harout,

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

[23724_HIG_TD_G_APP_ISN.pdf](#)

Also, looking forward, it would 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 very 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 disseminate within our lab, but it is worth looking over what some published products look like so that we can plan to adopt some of the same formatting strategies.

[Kang et al STAR Protocol.docx.pdf](#)

[CellPress_STAR Protocol_re.docx](#)

[s41596-018-0033-7.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.

Summary of Email from Bennett Novitch to Harout Gulessarian and Cendi Ling

Date: March 12, 2024

Sender: Bennett Novitch

Recipients: Harout Gulessarian, Cendi Ling

Content and Key Points:

1. Status Update on Dup15q Organoids:

- **Request for Progress Report:** Bennett inquires about the progress of making Dup15q organoids using Harout's protocol. He emphasizes the need to expedite the development of these organoids.
- **Opportunity for Testing:** Bennett expresses a desire for Cendi to test Harout's methods independently. This will allow for a comparison of Harout's approach with methods developed by Sally Temple's lab, based on Pasca methods.

2. Protocol Revisions:

- **Request for Updates:** Bennett asks if Harout has made any revisions to the protocol based on the feedback previously provided. He requests that any updated protocol be shared with Cendi.
- **Alternative Action:** If Harout has not made revisions, Bennett offers to share a version of the protocol that includes all details, even if it is not fully refined ("warts and all").

3. Additional Requirements:

- **SB590 Inhibitor Access:** Cendi will need access to the stock of the SB590 inhibitor to proceed with the experiments.

4. Appreciation and Support:

- **Acknowledgment:** Bennett appreciates Harout's efforts and support in the ongoing experiments.

Significance:

- **Urgency and Collaboration:** The email reflects a sense of urgency in advancing the Dup15q organoid project and highlights the importance of collaboration between lab members to evaluate and improve the protocol.
- **Protocol Sharing:** Bennett's offer to provide a less refined version of the protocol if revisions are not made suggests a willingness to move forward despite potential shortcomings.
- **Resource Access:** Ensuring that Cendi has access to necessary resources like the SB590 inhibitor is crucial for the success of the experiments.

Evidence Quotations:

- “We need to turn the heat up in getting somewhere with making Dup15q organoids.”
- “I'd really like for Cendi to be able to test out your methods on her own to expedite this process.”
- “If you have [revised the protocol], 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.”

Summary: Bennett’s email emphasizes the need to accelerate the Dup15q organoid project and suggests that Cendi test Harout’s methods alongside other methods. He requests updates on the protocol revisions and offers to share a complete version if revisions are not made. Additionally, he ensures that Cendi has access to necessary resources and expresses appreciation for Harout’s contributions to the project.

✉ Unable to verify message signature [?](#) [Show Details](#)

BN BENNETT NOVITCH March 12, 2024 at 5:08 PM
Protocol and Dup15q organoids [Details](#)
To: Harout Gulessserian, Cc: Cendi Ling

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

Summary of Evidence: Response to IP Disclosure

Email Details:

- *Sender:* Harout Gulessarian
- *Recipient:* Bennett Novitch
- *Date:* March 18, 2024
- *Time:* 3:42am

Content and Key Points:

Appreciation and Support:

- Harout expresses gratitude for Ben's support and acknowledges the difficulty of discussing sensitive issues related to intellectual property and personal challenges.
- Harout emphasizes their deep appreciation for Ben's efforts and assistance throughout the process.

Intellectual Property Concerns:

- *Provisional Patent Application:* Harout stresses the urgency of filing a provisional patent application to secure intellectual property and gain an early time-stamp from the USPTO.
- *Risks of Delay:* Harout highlights potential risks, including misappropriation and loss of inventor credit, if the provisional application is not filed promptly.

Legal and Emotional Impact:

- *Past Issues:* Harout mentions past discrimination and retaliation within the lab, impacting their ability to participate in projects and affecting their well-being.
- *Proposed Actions:* Suggests immediate action to file a provisional patent application with minimum required details to meet the "First-To-File" requirement, followed by a more detailed non-provisional application.

Confidentiality and Protection:

- *Secrecy of Protocol:* Emphasizes the need to keep the intellectual property confidential until the provisional filing is complete to prevent potential leaks or misappropriation.
- *Additional Legal Documents:* Requests exploration of legal documents like NDAs to protect the IP and ensure confidentiality among lab members.

Future Plans and Mediation:

- *Continued Research:* Plans to continue research on SB590885 and hopes to publish findings after securing provisional protection.
- *Healing and Mediation:* Expresses the need for time to address personal issues and engage in outside mediation, as suggested by Ben.

Request for Assistance:

- *TDG Involvement:* Requests Ben's assistance in ensuring the provisional application is filed promptly and guidance from UCLA's Technology Development Group (TDG).
- *Resource Links:* Provides links to UCLA TDG resources for further information on intellectual property protection and processes.

Evidence Quotation:

- “I believe since UCLA has had misappropriation related litigation in the past, UCLA could easily pursue any and all legal rights and remedies to prevent misappropriation from occurring.”
- “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.”
- “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.”

HG

From: Harout Gulessserian HKG90@icloud.com **Subject:** Re: Protocol and Dup15q organoids

Date: March 18, 2024 at 3:42 AM
To: BENNETT NOVITCH bnovitch@g.ucla.edu

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.

Consequently, if any 3rd party intentionally or accidentally leaks my intellectual property (prior to a pre-patent skeletal barebones filing) to a nefarious 3rd 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 violative 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 mediations. Going forward I need a little bit of time, but I am very willing to try your proposed outside mediations 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

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/pre-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 3rd parties who are not inventors/creators or otherwise hold any lawful interest in such intellectual property.

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 advertently 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 crystalized 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

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 & D84. 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 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 UCLAs 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 3rd 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/ip-disclosure-ownership>
<https://tdg.ucla.edu/industry-investors/faq/patenting>

NO RESPONSE FROM BENNETT TO THIS EMAIL

Summary of Evidence: Laboratory Equipment and IP Concerns

Email Details:

- *Sender:* Harout Gulessarian (used my UCLA email address here)
- *Recipient:* Bennett Novitch
- *Date:* March 31, 2024
- *Time:* 10:44 PM

Content and Key Points:

Lab Equipment Issues:

- *Incubator Malfunction:* Harout reports defective magnets on some incubators in the TC, causing moisture buildup on the glass doors when not properly sealed. This is impacting lab operations.
- *Proposed Solution:* Offers to contact Bryan and his affiliate to address the issue, whether by repair or replacement.

RNA Sequencing Funding:

- *Funding Information Needed:* Harout requests funding details required by the core's sequencing application, as he does not have this information.
- *Action Request:* Asks Ben to forward the necessary funding information to proceed with RNA sequencing.

BRAF Inhibitor and Research Strategy:

- *Cost-Efficiency Proposal:* Suggests that waiting for RNA sequencing data might be more cost-effective before deciding on a new BRAF inhibitor or drug. The sequencing data could guide which pathways to target, potentially identifying alternative drugs.
- *Supply Issue:* Notes that SB590885 is sold out with top vendors, indicating a potential supply issue.

Intellectual Property (IP) Protection:

- *Provisional Patent Application:* Emphasizes the urgency of processing the MTA (Material Transfer Agreement) and sponsor information to file a provisional patent application with the USPTO.
- *Timeliness and Risks:* Highlights the need for a timely filing to protect inventor credit and prevent potential IP misappropriation and litigation.
- *Current Lab Safeguards:* Queries about the current safeguards in place to protect IP within the lab and their alignment with the America Invents Act's "first-to-file" provision.

Request for Action:

- *Immediate Filing:* Urges the completion of the pre-patent provisional USPTO application to secure IP protection and allow more time for gathering data.
- *Safeguards Inquiry:* Requests clarification on existing IP protection measures and their compliance with the "first-to-file" system.

Evidence Quotation:

- “I wanted to bring to your attention that a few of the incubators in the TC seemingly have defective magnets... If you want, I can try to facilitate with some help by contacting Bryan.”
- “The core’s sequencing application is asking for the funding information; regrettfully, these are items that are not in my possession.”
- “Perhaps it’s more cost efficient to wait for the RNA sequence data before we essentially blindly move towards a different modularity Rx or molecule.”
- “Can we please process the previously referenced information (MTA & Sponsor Info) for TDG to complete the first-to-file pre-release provisional application with the USPTO.”
- “Until the RNA sequence data comes back, and until the provisional pre-patent application is completed with USPTO, the question remains: what safeguards to protect the IP are in place with our lab...?”

Source: Email from Harout Gulessarian to Ben Novitch dated March 31, 2024, 10:44 PM.

20:18



Bio-Techne RE: PO# 1430000051403 (Case
#01879889)

GK

Gulesserian, Harout K.

...

To: BENNETT NOVITCH

Sun 3/31/2024 10:44 PM

Hi Ben,

I wanted to bring to your attention that a few of the incubators in the TC seemingly have defective magnets. Apparently, now this is causing a buildup of moisture on the glass door if the magnet is not clicked in properly. As you can imagine, this is causing obstacles in the lab leading up to quandaries in the lane. If you want, I can try to facilitate with some help by contacting Bryan, and ascertain if Bryan and his affiliate can fix the problems or order new parts, if need be. Let me know.

Also, in an earlier email I had mentioned the desire to complete the RNA sequence. The main issue is that the core's sequencing application is asking for the funding information; regrettfully, these are items 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, as well.

Moreover, per your request to get a different BRAF inhibitor, here is just a thinking-out-loud thought: perhaps it's more cost efficient to wait for the above referenced RNA sequence data before we essentially blindly move towards a different modularity Rx or molecule. Essentially, this may very well be the case because the RNA sequence data may provide valuable insight as to which pathways would be inhibited (or promoted), which in turn, hypothetically further allows us to identify other categories of drugs that may work instead of just

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20:18



Furthermore, given Cendi was cc'd on the supplier email for the SB590885 drug, these issues are raising the specter of the imperative to get all the funding and MTA info over to TDG ASAP so TDG can immediately complete the pre-patent provisional USPTO application and thus seemingly secure the IP because time is legally of the essence. Consequently, our lab may not be equipped to protect the IP under the current operational status-quo; further making the case for the filing of the immediate provisional application which would basically give us the additional time needed to ensure our gathering of the requisite data exactly per your liking and comfort zone.

Consequently, until the RNA sequence data comes back, and until the provisional pre-patent application is completed with USPTO, the question remains: what safeguards to protect the IP are in place with our lab (and anyone else even remotely associated thereto); furthermore, presuming there are any safeguards (for the sake of argument), I am wondering how exactly these safeguards (if any) are in line with the first inventor to file (FITF) provision of the America Invents Act which professedly transitioned the U.S. to a first-inventor-to-file system.

Please advise. Thank you so much and I hope you had a fantastic Spring Break!

Harout

From: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Sent: Tuesday, March 26, 2024 10:50 AM
To: Phan, Minh D. <MDPhan@mednet.ucla.edu>
Cc: Gulessarian, Harout K.
<HGulessarian@mednet.ucla.edu>; Lino, Cendi

AA

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20:18



Moreover, per your request to get a different BRAF inhibitor, here is just a thinking-out-loud thought: perhaps it's more cost efficient to wait for the above referenced RNA sequence data before we essentially blindly move towards a different modularity Rx or molecule. Essentially, this may very well be the case because the RNA sequence data may provide valuable insight as to which pathways would be inhibited (or promoted), which in turn, hypothetically further allows us to identify other categories of drugs that may work instead of just sticking with the SB BRAF inhibitor only. Also, in my view, alarm bells are ringing as we are seeing that the SB590885 drug is completely sold out with two top vendors. That being said, can we please process the previously referenced information (MTA & Sponsor Info) for TDG to complete the first-to-file pre-release provisional application with the USPTO (aka, Untied States Patent Offices). Seemingly, filing the time-stamp sensitive provisional USPTO application ensures that proper inventor credit is had before the Federal government (timely application & prosecution in furtherance of patent protection) prior to any other third-party officious intermeddlers attempt to misappropriate via pilfered attempts to prevent TDG's timely filing of my instant protocol discovery, and thus opening foreseeable unneeded litigation floodgates, as well.

Furthermore, given Cendi was cc'd on the supplier email for the SB590885 drug, these issues are raising the specter of the imperative to get all the funding and MTA info over to TDG ASAP so TDG can immediately complete the pre-patent provisional USPTO application and thus seemingly secure the IP because time is legally of the essence. Consequently, our lab may not be equipped to protect the IP under the current operational status-quo; further making the case for the filing of the immediate provisional application which would basically give us the additional time needed to ensure our authoring of the disclosure.

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Summary of Evidence: Ben's Response to Harout

Email Details:

- *Sender:* Ben Novitch
- *Recipient:* Harout Gulessarian
- *Date:* April 1, 2024
- *Time:* 12:14 PM

Content and Key Points:

Availability and Scheduling:

- *Time Constraints:* Ben is occupied with time-sensitive grant-related matters due the following day, limiting his availability for other discussions.
- *Proposed Meeting Times:* Suggests meeting on Wednesday between 11:30 AM - 1:30 PM or 4:00 PM - 5:00 PM. If not feasible, the next available slot is Thursday from 4:00 PM - 5:00 PM.

Invention Report and Methods:

- *Proof of Reproducibility:* Ben reiterates the need to see evidence that the methods and drug can be consistently reproduced by others, emphasizing the importance of demonstrating robustness beyond Harout's individual expertise.
- *Replication Studies:* Stresses the need for replication with additional cell lines to identify any limitations and validate the methods more comprehensively.

Drug Availability:

- *Drug Supply:* Advises ordering the drug from available vendors to ensure continuity of testing and research, noting that product availability can fluctuate.

Incubator Repair:

- *Action on Incubator:* Instructs Harout to contact Bryan and work with Keith to arrange for replacement parts as necessary.

Evidence Quotation:

- “I am working on time sensitive grant related matters today... Let’s plan on talking on Wednesday.”
- “I will nevertheless repeat my wishes which is to submit an invention report only after I’ve seen proof that the methods can be reproduced by other’s hands...”
- “Did we find availability of the drug from other vendors? Products go in and out of stock all the time...”
- “Regarding the incubator, please do contact Bryan and work with Keith in getting replacement parts as needed.”

Source: Email from Ben Novitch to Harout Gulesserian, dated April 1, 2024, 12:14 PM.

20:18

You forwarded this message on Tue 4/2/2024 1:34 PM

BENNETT NOVITCH

To: Gulessarian, Harout K.
Mon 4/1/2024 12:14 PM

Hi Harout,

I am working on time sensitive grant related matters today (they are due tomorrow so are eclipsing all else), and so 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 Wednesday. I think that I should have a little time free around midday (11:30-1:30pm) and probably 4-5pm. If not then, Thursday 4-5pm would be the next time open. I will nevertheless repeat my wishes which is to submit an invention report only after I've seen proof that the methods can be reproduced by other's hands so that I know that it's the robustness of the drug and methods as you've composed them, and not just your personal magic which, while great, would be hard to commodify. I am hoping that you've been working with Cendi and others in the lab in giving the instructions 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 these replication studies done.

Did 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 so that we're not without it so that we can continue testing and using it to move our research projects forward.

Reply

AA outlook.office.com

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20:19

done.

Did 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 so 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,

Ben

...

GK Gulessarian, Harout K. Tue 4/2/2024 1:34 PM
Hi Ben, The intention of filing my protocol discovery ...

GK Gulessarian, Harout K. Tue 4/2/2024 1:35 PM
(No message text)

GK Gulessarian, Harout K. Tue 4/2/2024 1:37 PM
(No message text)

BN BENNETT NOVITCH

Reply

AA outlook.office.com

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Summary of Evidence: Harout's Follow-Up Email

Email Details:

- *Sender:* Harout Gulessarian
- *Recipient:* Ben Novitch
- *Date:* April 2, 2024
- *Time:* 1:34 PM

Content and Key Points:

Provisional Patent Application:

- *TDG and Legal Requirements:* Harout emphasizes that filing a provisional patent application with TDG is essential to protect IP interests under federal and state laws. According to TDG, this is crucial for complying with University Policy and Federal law.
- *Critical Information:* Highlights that the delay in filing the provisional application is due to the lack of submission of required sponsor and MTA information, which TDG has specifically requested.
- *FITF Provision:* Reiterates the importance of securing the IP under the First-Inventor-to-File (FITF) provision of the America Invents Act to prevent exposure to misappropriation and safeguard the inventor's rights.

Concerns and Speculation:

- *IP Protection and Safeguards:* Harout expresses concern that the current operational status exposes the IP to potential malfeasance and does not align with TDG's instructions or University Policy.
- *Ongoing Issues:* Notes that despite previous discussions, there have been no attempts to address the alleged discriminatory, retaliatory, or hostile behaviors in the lab, which compounds concerns about IP misappropriation and trade secret exposure.

Grant and Prioritization:

- *Balancing Priorities:* Acknowledges Ben's time-sensitive grant matters but stresses that protecting IP is equally critical. Urges that the provisional application should not be delayed further to avoid jeopardizing IP protection.

Operational and Confidentiality Issues:

- *Protocol Sharing:* Harout indicates that the protocol/discovery was only shared with TDG and that Ben's access to it was through TDG. He opposes any actions that could compromise the confidentiality of the IP before the provisional application is filed.
- *Lack of Remedial Action:* Reiterates that there has been no progress in addressing the issues of discrimination and hostility in the lab, which continues to affect Harout's work and well-being.

Evidence Quotation:

- “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.”
- “Failure to deliver to TDG what TDG expressly asked for... is inconsistent with TDG instructions, University Policy, and Federal law.”
- “I am again left with only the ability to speculate and surmise at admitted misappropriation/discriminatory lab member intentions...”
- “I hope my FF organoid protocol/use of SB590985 does not become subject to misappropriation/trade secret/exposure...”
- “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...”

Source: Email from Harout Gulessarian to Ben Novitch, dated April 2, 2024, 1:34 PM.

20:25

Gulesserian, Harout K.

To: BENNETT NOVITCH

Tue 4/2/2024 1:34 PM

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 ("FIF") 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. This would

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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/steals/competition etc.

Reply

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20:25



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 3rd 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



Reply

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20:25



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.



Reply

AA

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20:19 0:08

GK (No message text)

GK Gulessarian, Harout K. Tue 4/2/2024 1:37 PM
(No message text)

BN BENNETT NOVITCH To: Gulessarian, Harout K.
Wed 4/3/2024 12:27 AM

Hi Harout,

I didn't see our confirming a time for talking tomorrow (now today), but it might be a good thing as I missed that we have a two oxygenation project meetings tomorrow, one with the Lin lab at 2pm, but also a meeting at 11am with Dr. Heather Christofk, one of the metabolism experts who we've been getting input from for the project. This thus leaves me with time free after the 2pm meeting ends (which I think will be more than an hour, so probably would be around 3:30 or 4pm. Since lab meeting is canceled this week, we could also set up a time to speak on Thursday between ~10-11am. Note that I am going to call for a meeting with our entire lab at 11am about Communi-tea, which we're hosting next week. I should also be free Thursday from 3:30-4:30.

Ben

...

Reply

AA outlook.office.com

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20:18



Please advise. Thank you so much and I hope you had a fantastic Spring Break!

Harout

From: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Sent: Tuesday, March 26, 2024 10:50 AM
To: Phan, Minh D. <MDPhan@mednet.ucla.edu>
Cc: Gulessarian, Harout K.
<HGulessarian@mednet.ucla.edu>; Ling, Cendi
<CendiLing@mednet.ucla.edu>
Subject: Re: Bio-Techne RE: PO# [14300000051403](#) (Case #01879889)

It's sold by some other companies https://www.adooq.com/sb590885.html?gad_source=1, also from Sigma though the latter is not in stock.

Sent from my iPhone

On Mar 26, 2024, at 11:48 AM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Ugh. Is there any other vendor? Harout it would actually be worth testing other Braf inhibitors to see if the effects are specific to SB or recapitulated by other modulatory drugs

Sent from my iPhone

On Mar 26, 2024, at 11:18 AM, Phan, Minh D. <MDPhan@mednet.ucla.edu> wrote:

AA

outlook.office.com



Summary of Evidence: Follow-Up Email from Harout

Email Details:

- *Sender:* Harout Gulessarian
- *Recipient:* Ben Novitch
- *Date:* April 9, 2024
- *Time:* 12:12 PM

Content and Key Points:

Provisional Patent Application:

- *Gratitude for Progress:* Harout expresses gratitude and relief that the provisional patent application will be submitted within the week. He requests a tentative timeline for the completion and submission of this application, emphasizing the importance of an expedited USPTO provisional timestamp for securing IP and advancing research.
- *Future Steps:* Harout plans to continue working on protocol edits and looks forward to circulating the protocol for further testing once the IP is secured.

RNA Sequencing:

- *Acknowledgement and Plans:* Harout thanks Ben for funding the RNA sequencing and indicates that the samples will be submitted on April 9, 2024. He also plans to split the costs over multiple FAUs and hopes for favorable data results.

Academic Paper and Research:

- *Proposal for Paper:* Suggests starting work on an academic paper related to the SB590885 discovery and FF organoid protocol. This would include drafting manuscripts based on previous proposals and could enhance lab cohesion through potential co-authorship opportunities.
- *Graduate School:* Harout expresses interest in continuing this research during graduate school and potentially using it for his thesis, with Ben as his mentor.

Team Expansion and Collaboration:

- *Additional Students:* Requests Ben's assistance in finding another student (such as Erick) to join the project, given the increasing volume of data. Harout believes that additional help will be beneficial as the research progresses.
- *Sangmok's Interest:* Mentions that Sangmok has expressed interest in learning how to make brain organoids and offers to teach him. Harout is open to hosting an organoid-making workshop for all interested parties once the provisional application is timestamped.

Workshops and Lab Collaboration:

- **Workshop Plans:** Plans to host a workshop to ensure seamless protocol transition and potential publications. This is aimed at improving the lab's credibility and securing future grants.

Meeting and Lab Activities:

- **Upcoming Events:** Looks forward to participating in the Communi-tea event and the celebration for Eric. Suggests scheduling a meeting with Ben, Erick, and himself either on Friday or Monday to discuss recent data and further steps.

Evidence Quotation:

- “I AM SO GRATEFUL and relieved that we are going to submit the pre-patent provisional application sometime this week; thank you!!”
- “I am currently working on the edits you had suggested on the protocol and will have that ready at my disposal in the next few days.”
- “Could we also contemporaneously begin working towards an academic paper on the SB590885 discovery and FF organoid protocol...?”
- “I look forward to helping out with the Communi-tea event on Wednesday, along to Friday’s celebration for Eric and his achievements.”

Source: Email from Harout Gulessarian to Ben Novitch, dated April 9, 2024, 12:12 PM.



 Hi Ben,

 Thanks for discussing the various points that were brought up during our meeting last Thursday afternoon. I hope we move forward from this situation as we try to work things out in a positive manner.

 After sitting with things for a day or two, I have a few thoughts that I briefly wanted to run by you.

 I know that one of the main points we discussed was the provisional pre-patent application. First, I just want to say right off the bat: I AM SO GRATEFUL and relieved that we are going to submit the pre-patent provisional application sometime this week; thank you!! On that note, I am trying to organize the rest of the schedule for this week (and next) because I want to spend some additional time working with both Erick and Candi, along with planning my lab schedule as well which will likely get bumped depending on availability of Erick and Candi respectively.

 That being said, I am wondering (provided of course, it is not overwhelmingly burdensome), whether you can provide a tentative timeline for this week (and even going into next) week if need be! regarding the completion of the pre-patent application. Once we submit to USPTO they very well may attempt to make an expedited arrival at a USPTO provisional timestamp filing to secure the IP so we can rapidly begin expanding our research and data gathering on the SB590885 molecule and the FF brain organoid protocol. I am currently working on the edits you had suggested on the protocol and will have that ready at my disposal in the next few days. I look forward to timestamping the discovery with the USPTO via TCG's filing with the notion to get things expedited as fast as possible to begin circulation of the protocol for further testing across various UCLL sites.

 Next, I AM EXTREMELY AND FURTHER GRATEFUL for your sharing and funding of the RNAseq; again, THANK YOU SO MUCH!

 Here is an idea, and I am not sure if it would be too unorthodox or synergistically ideal timing. Essentially, while we are doing research and gathering the data for the ultimate final non-provisional patent filing, could we also contemporaneously begin working towards an academic paper on the SB590885 discovery and FF organoid protocol and the topics found in the proposed draft manuscripts that were forwarded to TCG?

 I ask this for a few different reasons: #1) once the IP is protected by the timestamp provisional time stamp, it may very well end up being a positive lab bonding experience if we can offer a co-authorship to all lab members on a proposed research paper (or 2 papers therefore, for that matter); and #2) because I really would like to continue to work on this during graduate school, and possibly turn this into my thesis with you being my mentor.

 Again, I cannot say “Thank You” to you enough times, especially for providing the necessary information and application for RNAseq. Looks like we will be able to submit the samples today 04/09/2024. The core is fine with us splitting the cost over multiple FAIRs, I plan to forward the application to the core later in the day. I am also hopeful that the data we send out is going to be favorable! I am eagerly waiting to get started on analyzing the data to begin putting together what I believe will be the second and/or third figure of the research paper we plan to put together. Once the IP is secured and timestamped with USPTO, I hope we can have all hands-on deck and work collaboratively as a team aiming to publish a research paper with a top academic research publishing company. I look forward to getting all of this done with everyone participating. On that note, do you think you could find another student for us such as Erick to add onto the team? The data is starting to ramp up, I really could use at least one if not two more committed students onto the project like Erick. Please do consider this, we are about to produce a plethora of organoid data.

 By the way, Bangrok reached out today stating he has interest in brain organoid work and would like to start learning how to make them. I am open to this idea and would love to teach Bangrok how to make the organoids once we timestamp the application. It is very likely that I will be willing to host an organoid making workshop to all TCG parties we plan to share the protocol with. This way no screws are left loose, and we ensure a seamless transition of the so called “magic” to all the available hands on deck as all had proposed.

 Just as a recap, I reached out to Candi offering to help & teach how to make organoids over the past weekend. We met Sunday afternoon as I was instructing Erick in making organoids at the same time. Just as a FYI I will focus on the in-house organoid protocol that everybody currently follows. In the very near future, once the USPTO timestamp is in for the pre-patent petition, I think I will be willing to host a workshop so we can get all hands-on deck and really test out my Pfeifer brain organoid protocol using an in-house division of labor approach with all of the lab members included. This will potentially foster another publication or less, continue to increase your lab's credibility in terms of research related to brain organoids, and will likely lead to future grants that will seemingly continue to enhance your lab in a positive trend.

 Lastly, I look forward to helping out with the Communi-tea event on Wednesday, along to Friday's celebration for Eric and his achievements. Let me know when your availability free's up so we may have a meeting (you, Erick, and myself). I would prefer we meet either Friday or on Monday as I am gathering more and more data to show you.

 Thank you for your all of your help and insights Ben, see you in laid.

 Harout

Summary of Evidence: Follow-Up Email from Harout

Email Details:

- *Sender:* Harout Gulessrian
- *Recipient:* Ben Novitch
- *Date:* April 11, 2024
- *Time:* 9:07 AM

Content and Key Points:

Sample Replication and Protocol Framework:

- *Clarification on RNA Samples:* Harout clarifies that the RNA samples referenced in the draft manuscript submitted to TDG are the same as those being discussed in recent communications. This includes the qPCR results for various time points (Days 0, 1, 3, 9, 18, and 35) with and without treatment.
- *Nature of Replication:* He explains that the RNA samples in question are from the same batch as indicated in the draft manuscript and provides context for understanding the protocol framework.

Meeting Request:

- *Discussion on Provisional Patent Application:* Harout requests a meeting to discuss the details of the protocol and the TDG pre-patent provisional application. He notes that it has been a week since Ben agreed to sign off on the application and emphasizes the urgency of preserving the IP.

Project Title Change:

- *Title Update:* Harout suggests informing TDG if the project title has been changed from “Accelerated Cerebral Organoid Protocol (ACOP)” to “Optimization of drug treatment on early stages of organoid formation.” He stresses the importance of updating TDG on this matter.

Timeline and Filing:

- *Request for Timeline:* He asks for a timeline to finalize the document for TDG and proceed with filing the provisional patent application with the USPTO. He references previous emails and emphasizes the need to protect the IP and circulate the protocol among UCLA labs within the one-year window allowed by federal law.

Data Analysis:

- *Request to Analyze Data:* Harout requests permission to analyze the data himself and use the extra \$7,000 in funds to improve the lab and protocol. He mentions that Eric is willing to assist with the coding.

Lab Assistance and Staffing:

- *Additional Help:* Harout requests the addition of another UCLA student to the lab and suggests reaching out to CIRM Bridges for a second student. He emphasizes the need for extra help due to the increasing volume of work.

Acknowledgment and Additional Notes:

- *CIRM Bridges Commercial:* Harout notes that he, Samantha, and Ben are featured in the latest CIRM Bridges Commercial, expressing enthusiasm about this recognition.

Evidence Quotation:

- “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.”
- “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.”
- “We likely should inform TDG ASAP if we changed the title of the project.”
- “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.”
- “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 a second student.”

Source: Email from Harout Gulessarian to Ben Novitch, dated April 11, 2024, 9:07 AM.



Harout Gulessserian

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 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 3/16/2024 @ 3:52am titled "Protocol and Dop15q organoids", and another 4/2/2024 1:34pm "Fw: Bio-Techne RE: POF 14300000051403 (Case #P0879899)"] 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 GULESSERIAN](#)

Summary of Evidence: Ben's Response to Harout

Email Details:

- *Sender:* Ben Novitch
- *Recipient:* Harout Gulessarian
- *Date:* April 11, 2024
- *Time:* 1:01 PM

Content and Key Points:

Current Workload and Priority:

- *NIH Progress Reports:* Ben informs Harout that he is currently focused on completing two NIH progress reports due by Monday. This takes precedence over any work related to IP matters.

IP Work Timeline:

- *Delay in IP Work:* Ben indicates that he will not be able to address IP-related tasks until after the NIH reports are submitted. He requests that Harout send any updates on the IP work early to mid-next week so that they can resume working on it.

Evidence Quotation:

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

Source: Email from Ben Novitch to Harout Gulessarian, dated April 11, 2024, 1:01 PM.

The screenshot shows an email interface with the following details:

- Header: Found in Mail - iCloud Mailbox
- Status: ⓘ Unable to verify message signature
- From: BENNETT NOVITCH (BN)
- Re: Recap
- To: Harout Gulessarian
- Date: April 11, 2024 at 1:01 PM
- Body:

Hi Harout,

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

Ben

[See More from HAROUT.GULESSARIAN](#)

Summary of Evidence: Email Chain - "Delays"

Email Chain Details:

- *Subject:* Delays
- *Participants:*
 - *Harout Gulessarian* (Sender)
 - *Ben* (Recipient)
 - *Natella* (Mentioned)
 - *Mark Lucas* (Mentioned as a mediator)

Source: Email chain titled "Delays" involving Harout Gulessarian, Ben Novitch Natella and Mark Lucas. The email addresses concerns about protocol ownership and lab recognition.

During this period, I was in discussions with UCLA Office of the Ombuds and sought to have Thomas Griffin serve as the mediator. However, Ben selected Mark Lucas, who, as detailed further in the memorandum, demonstrated clear bias and aligned himself with Bennett Novitch. Additionally, Mark Lucas misinformed me about HR reporting information, the initiation of FMLA, and appeared more concerned with Harout's plans rather than providing the assistance needed to file immediate FMLA leave.



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

Found in inbox - Cloud Mailbox

NATELLA VAHKTANGOVNA BALIAOURI April 12, 2024 at 7:48 PM
Re: Delays Details
To: Harout Gulessarian; CC: BENNETT NOVITCH

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 gs, 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 ifp 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](#)

Found in Inbox - iCloud Mailbox

BENNETT NOVITCH

Re: Delays

To: Natella Ballaoui; Cc: Harout Gulessserian

April 13, 2024 at 12:36 AM

Details

Siri found new contact info: Bennett Novitch bennett@ucla.edu

Add...

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, Cendil, 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.

Pest 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 8am work for you?

Ben

[See More from NATELLA VAKHTANGOVNA BALLOUFI](#)

HB

Harout Gulessserian

Re: Delays

Tel: BENNETT NOVITCH

April 15, 2024 at 2:25 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.

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 are their "collective wisdom" which dubs them somehow miraculously as "creators" and

BENNETT NO... 100... 4509
DRAFT #0
All rights, Once again, I am reserving
and reserving all rights and nothing...

Stealing something by definition means what is being stolen is someone else's property interest, neither the collective lab "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 at 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 institutions 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 ethnocultural 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 ethnocultural 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 intendo 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.

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.

BENNETT NO.: Inv. #47524
Date: 4/13/24
Hi there, Once again, I am objecting
and reserving all rights and making...

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 (3/4/2024), 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 a 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 annus of procrastinating to give "MTA and Sponsor information," which annus 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's (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 CPO, TDG and the attorneys/experts and others of UCLA who are the folks tasked with ascertaining who shall be dubbed a "inventor"/"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/CPO and all other UCLA stakeholders 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 misappropriator who you know put their malicious intentions in writing.

BENNETT NO.: Inv. #47524
Date: 4/13/24
Hi there, Once again, I am objecting
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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/CPO and all other UCLA stakeholders 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 misappropriator 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 CPO/TDG per CPO/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/CPO/UCLA per CPO/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 CPO/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 Nathalia 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 manipulative 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.

BENNETT NO.: 5m... 47624
Delay: 7D
Hi Ben, Once again, I am objecting
and reserving all rights and waiver.

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 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/NIR'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 2004 with my entire invention and all relevant details from my memory of the accidental discovery via writing a draft manuscript to TDG to UCLA/CPO 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, NIR's interest, your interest, my interest forward by you giving the information that is only in your possession to CPO/TDG so there will be no harm suffered to any stake holders by any delays and as CPO/TDG can do their job, as the faster CPO/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 patent 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 invidiously 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 Patient 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/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

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/CPO 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 CPO/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 unheeded 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/CPO 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/CPO as I have dutifully provided TDG/CPO 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.

BENNETT NO... Sent... 4/15/14
Delay... To...
Hi Ben, Once again, I am objecting
and reserving all rights and making...

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 CIPD/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/CIPD 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/CIPD as I have dutifully provided TDG/CIPD UCLA with all information which was exclusively in my possession via draft manuscripts and meetings with and per the specific instructions of UCLA officials.

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I remain committed to working this out amicably and professionally.

Harout

names?

BENNETT NO... Sent... 4/15/14
Delay... To...
Hi Ben, Once again, I am objecting
and reserving all rights and making...

② People W/Details - Cloud Contacts
③ Unable to verify message signature Show Details
BENNETT NOVITCH April 15, 2014 at 10:44 AM
Re: Delay Details
To: Harout (bennett), Cc: Mark Lucas

④ Siri found new contact info: Bennett Novitch bennett@ucla.edu Add... Details

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 difficulties. 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 easing 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 21. 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
450 Charles E. Young Drive South, CHS 67-200K
Los Angeles CA 90095

Phone (office): 310-794-8039
Phone (lab): 310-655-7568
Fax: 310-655-2204
Email: bennet@ucla.edu
Web: <http://neurochairs.com>

From: BENNETT NOVITCH bnovitch@g.ucla.edu
Subject: Re: Time off request
Date: April 18, 2024 at 9:32 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: Mark Lucas mlucas@mednet.ucla.edu

BN

Hi Harout,

I am supportive of your taking a vacation in the very near future. However, the timing and length of your request are unusual both in the very short notice that you're giving and the prolonged length of time away. As such, I cannot approve it straight away, and will need to consult with Mark Lucas, who I have cc'd on this email. I will get back to you with a more concrete answer tomorrow.

Please note two further considerations. First, I am expecting you to attend a meeting with me and Mark on Monday morning (at 10am). *This meeting must go ahead.*

Second, given the length of your requested vacation, we will need to additionally meet to discuss contingency plans to put a pause on some of your experiments, and recruit members of the lab to help keep other experiments going. It is not possible to make all these arrangements with a single day's notice.

I am available tomorrow morning between 10:15-12pm to discuss the planning steps needed before you leave for a vacation.

Ben

On Apr 18, 2024, at 6:25 PM, Harout Gulesserian <hkg90@icloud.com> wrote:

Hi Ben,

I am requesting a 3 week vacation. Below are my requested dates.

Start: April 20 2024

End: May 12 2024

Harout

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Time off request
Date: April 19, 2024 at 12:00 PM
To: BENNETT NOVITCH bnovitch@g.ucla.edu

HG

Hello Ben,

Hope all is well. I have a few healthcare matters today that I am tending to. At the earliest time after my healthcare matters, I will respond to any and all laboratory items and matters.

Thanks,
Harout

On Apr 18, 2024, at 9:32 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Hi Harout,

I am supportive of your taking a vacation in the very near future. However, the timing and length of your request are unusual both in the very short notice that you're giving and the prolonged length of time away. As such, I cannot approve it straight away, and will need to consult with Mark Lucas, who I have cc'd on this email. I will get back to you with a more concrete answer tomorrow.

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Hi Ben,

I am requesting a 3 week vacation. Below are my requested dates.

Start: April 20 2024
End: May 12 2024

Harout

From: BENNETT NOVITCH bnovitch@g.ucla.edu
Subject: Re: Time off request
Date: April 19, 2024 at 12:42 PM
To: Harout Gulessarian hkg90@icloud.com

BN

Hi Harout,

I really appreciate your sending me this message and letting me know what you are up to. Will you be coming in at all today and/or early next week? Is it really important that we discuss some preparation steps before you leave for a vacation.

With that in mind, I have started a conversation with Erick, and he showed me all of the culture that you have going, and gave me some insights into the workflow of the experiments. I nevertheless have many questions, and feel that we need to collectively discuss the timelines for each of the experiments that are ongoing, particularly what the end points are for sample collection and, subsequently, analysis. I got the sense that Erick is versed in feeding the cultures, but doesn't know where the goalpost are. My sense is also that he doesn't have much capacity to keep the pipeline for organoid formation going, so I would like to discuss steps that we can take to enable him or others to contribute to the organoid making while you are away, so that we do not experience a lapse in our progress with the project.

I also reviewed the notebook that you have set up with Erick and am pleased with the way that you've set him up so far. I do have some suggestions for additional things that you can add (timelines at the start of experiments, projected schedules for when things should happen, etc) that could really help give him some additional guidance in your absence.

One thing that I did not get from Erick is access to data that you have collected as part of the SSPsyGene project efforts, which I need immediate access to. We have a internal meeting this Monday at 3pm, and I was hoping that you and Erick could participate in this meeting and update the group on what you've been doing, and things that you're seeing thus far with those two mutant iPSC lines as these will be some of the first data that we've had from the project. If you are not able to join, I would like to at least present what we have so far.

I've heard from Mark that he's reached out to you to arrange a meeting with him (without me) on Monday, and I hope that you will respond and take advantage of this opportunity.

Please do keep me updated, and come and find me when you are able to make it into the lab.

Thanks,

Ben

On Apr 19, 2024, at 12:00 PM, Harout Gulessarian <hkg90@icloud.com> wrote:

Hello Ben,

Hope all is well. I have a few healthcare matters today that I am tending to. At the earliest time after my healthcare matters, I will respond to any and all laboratory items and matters.

Thanks,
Harout

On Apr 18, 2024, at 9:32 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

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I am available tomorrow morning between 10:15-12pm to discuss the planning steps needed before you leave for a vacation.

Ben

On Apr 18, 2024, at 6:25PM, Harout Gulessarian <hkg90@icloud.com> wrote:

Hi Ben,

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Chat?
Date: April 25, 2024 at 12:48 AM
To: Lucas, Mark MLucas@mednet.ucla.edu

HG

Good day, Mark.

After discussing time off for healthcare matters(among other things), and reaching an understanding with the UCLA Office of Ombud's Services on the matters, I subsequently requested from Ben some time off from work due to issues germane to the Ombudsman meetings.

I had requested to use my vacation time for my healthcare matters that urgently need tending to.

First, I was wondering whether there are any updates regarding my time off request.

Second, in the event that I am prohibited from using my vacation time, then I need to better understand how I can use my sick time off effective immediately. Your advice on this would be deeply appreciated.

Moreover, I don't know if this is the proper forum for reporting something that occurred to me today at work which I found offensive, unprofessional, and inappropriate. More specifically, at approximately 4:10pm yesterday afternoon, I was going to grab a snack from the first-floor vending machines next to cafe med. Samantha Butler (Wife of Bennett Novitch) and Bennett Novitch both (at the same time) ran into me in the hallway.

Although, both husband and wife respectively exhibited hostile behavior towards me, Samantha Butler, in express public view in the hallway got loud, showed anger, opened her eyes wide, made me feel extremely apprehensive, and uncomfortable. Samantha Butler told me I am going to be written up, fired, and accused me of being a liar because I stated that I never received an email from you (I found this particularly odd given Samantha Butler is not my supervisor nor do I work in her lab). I don't believe this is in line with UCLA policy for a person to come to work only to be put in fear of personal harm; particularly retaliatory actions such as threats and demeaning/slanderous comments that a reasonable person would find harmful and offensive in front of other UCLA bystanders..

Moreover, I looked into my inbox again, and I sincerely believe this is the first email I received from you regarding the matter. Therefore I must object to Samantha's defamatory/slanderous remarks regarding any correspondence between you and I.

My Email addresses are:

Hkg90@icloud.com
Hgulesserian@mednet.UCLA.edu

Let me say in advance, I appreciate your time, assistance, and guidance on these apprehensive matters. Moreover, I also appreciate the confidentiality in our instant correspondence.

Thanks,
Harout

On Apr 24, 2024, at 7:31 PM, Lucas, Mark <MLucas@mednet.ucla.edu> wrote:

Hi, Harout. Ben asked me to reach out to see if we could set up a 1:1 meeting regarding some questions you had. I advised him that best he not be present, in case you have some issues of confidentiality to raise. Please let me know if you want to meet and if so when you're available.

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

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Meeting
Date: April 25, 2024 at 1:03 AM
To: BENNETT NOVITCH bnovitch@g.ucla.edu
Cc: Gulessarian, Harout K. HGGulessarian@mednet.ucla.edu, Mark Lucas mlucas@mednet.ucla.edu

HG

Hi Ben,

Currently I have reached out to UCLA admin regarding times and schedules affecting my healthcare matters. As soon as UCLA admin responds to me, and I have a better understanding of timelines and availabilities per UCLA admin, then I will subsequently reach out to you with less speculative and hopefully more accurate information per your request.

Thanks,

Harout

On Apr 24, 2024, at 9:24 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Hi Harout,

What are your plans for the remainder of this week- will you be in either tomorrow or Friday? If you are, I would like to arrange times for us to talk, and for you to speak with Mark Lucas, either in person or over zoom.

Please let me know what is possible.

Thanks,

Ben

From: Lucas, Mark MLucas@mednet.ucla.edu
Subject: Re: Meeting
Date: April 25, 2024 at 7:40 AM
To: Harout Gulesserian hkg90@icloud.com
Cc: BENNETT NOVITCH bnovitch@g.ucla.edu, Gulesserian, Harout K. HGulessrian@mednet.ucla.edu

ML

Hi, Harout. I'm the person who needs to help process the leave. This is what I am referring to. Ben did mention that you wanted to take vacation (3 weeks) and then said you didn't show up to work on Friday. Approval of vacation is at the discretion of your supervisor (based on institutional needs). However, you can certainly take a medical leave (under FMLA) at any time and this is what I was hoping to discuss/facilitate. Thanks.

On Apr 25, 2024, at 1:03 AM, Harout Gulesserian <hkg90@icloud.com> wrote:

Hi Ben,

Currently I have reached out to UCLA admin regarding times and schedules affecting my healthcare matters. As soon as UCLA admin responds to me, and I have a better understanding of timelines and availabilities per UCLA admin, then I will subsequently reach out to you with less speculative and hopefully more accurate information per your request.

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Please let me know what is possible.

Thanks,

Ben

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From: Harout Gulessserian HKG90@icloud.com
Subject: Update: Healthcare matters
Date: April 26, 2024 at 2:04 PM
To: Mark Lucas MLucas@mednet.ucla.edu
Cc: BENNETT NOVITCH bnovitch@g.ucla.edu

HG

Hello Mark and Ben.

Good day. I am currently tending to important healthcare matters. Mark mentioned that I contact Helen Nguyen to complete the paperwork for sick time/illness matters:

*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*

Unless I am mistaken, it appears once the healthcare/ sick-time paperwork is completed it is likely Helen will forward all necessary documents to all necessary UCLA departments.

Once again, at the earliest time after I resolve my healthcare matters, I will respond and return to any and all laboratory matters/items.

Thanks,
Harout

From: Lucas, Mark MLucas@mednet.ucla.edu
Subject: RE: Update: Healthcare matters
Date: April 26, 2024 at 2:13 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: BENNETT NOVITCH bnovitch@g.ucla.edu

ML

Hi, Harout. Can you please share your plans? I'm unclear what you're proposing. Thanks.

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Friday, April 26, 2024 2:05 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Cc: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Subject: Update: Healthcare matters

Hello Mark and Ben.

Good day. I am currently tending to important healthcare matters. Mark mentioned that I contact Helen Nguyen to complete the paperwork for sick time/illness matters:

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

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Once again, at the earliest time after I resolve my healthcare matters, I will respond and return to any and all laboratory matters/items.

Thanks,
Harout

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From: BENNETT NOVITCH bnovitch@g.ucla.edu
Subject: Re: Update: Healthcare matters
Date: April 26, 2024 at 2:22 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: Mark Lucas MLucas@mednet.ucla.edu

BN

Hi Harout,

I also need to ask you an important question from the lab about the identity of the N2 supplement that you found was giving the best results in your organoid experiments. Can you please send me or Soizic the information that she needs to order more of that lot #? Any supporting data that you can provide would also be helpful.

Thanks,

Ben

On Apr 26, 2024, at 2:13 PM, Lucas, Mark <MLucas@mednet.ucla.edu> wrote:

Hi, Harout. Can you please share your plans? I'm unclear what you're proposing.
Thanks.

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Sent: Friday, April 26, 2024 2:05 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Cc: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Subject: Update: Healthcare matters

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Helen Nguyen, (*She/Her/Hers*)
Human Resources Analyst
Department of Neurobiology
David Geffen School of Medicine at UCLA
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E: HelenANguyen@mednet.ucla.edu

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Once again, at the earliest time after I resolve my healthcare matters, I will respond and return to any and all laboratory matters/items.

Thanks,
Harout

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From: Harout Gulessarian HKG90@icloud.com
Subject: Harout Gulessarian FMLA
Date: April 29, 2024 at 9:36 AM
To: LOAtteam@mednet.ucla.edu

HG

Good morning,

My name is Harout Gulessarian, I am reaching out to find out what documents are needed to complete FMLA? FMLA leave was in effect on 04/24/24 evening.

Thank you for all of your help,

Harout Gulessarian

From: LOA Team LOATeam@mednet.ucla.edu
Subject: RE: Harout Gulesserian FMLA
Date: April 29, 2024 at 10:27 AM
To: Harout Gulesserian hkg90@icloud.com, LOA Team LOATeam@mednet.ucla.edu

LT

Hello Harout,

Thank you for contacting the Leave of Absence Team.

Please click on the provided link to request a leave of absence if you are in need of either a Block Leave (out for 4 consecutive days or more) or Intermittent leave (need to miss work here and there) due to your own medical condition or a family member's:

[https://uclahsprod.service-now.com/eec?
id=sc_cat_item&sys_id=c06d6e5287f06510f367426d0ebb35f6](https://uclahsprod.service-now.com/eec?id=sc_cat_item&sys_id=c06d6e5287f06510f367426d0ebb35f6)

Once you submit your leave of absence request, you will be assigned a Leave Analyst. Within 24 hours you will be sent a DocuSign email with the appropriate paperwork to have completed.

Once the supportive documentation is completed, **Please upload this documentation by completing the task assigned to you in Employee Experience Center: [TASK LINK IN SN]**

You can also see the task under Employee Experience Center > My To-dos

A leave analyst will reach out to you as soon as it is possible.

I hope that the assistance I provided was helpful. If you need additional assistance, please respond to this case notification within 48 hours or call the LOA team at 310-794-0078. We will be happy to assist you further.

Thank you,

Leave of Absence

Employee Experience Center

Putting U First

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Monday, April 29, 2024 9:36 AM
To: LOA Team <LOATeam@mednet.ucla.edu>
Subject: Harout Gulesserian FMLA

Good morning,

My name is Harout Gulesserian, I am reaching out to find out what documents are needed to complete FMLA? FMLA leave was in effect on 04/24/24 evening.

From: BENNETT NOVITCH bnovitch@g.ucla.edu
Subject: Re: N2 order
Date: April 29, 2024 at 9:12 PM
To: Soizic Riche soizic.riche@gmail.com
Cc: Samantha Butler butlersj@ucla.edu, Keith Phan keithdphan@gmail.com, ERIC HEINRICHES eheinrichs@g.ucla.edu, Jessie Butth jebuth51@gmail.com, Natella Baliaouri nbalia1@ucla.edu, Cendi Ling cendiling@g.ucla.edu, Sandeep Gupta sandeepscience9@gmail.com, Selena Gallardo sgallardo@g.ucla.edu, Yesica Mercado-Ayon mercadoayon@g.ucla.edu, Harout Gulesserian HKG90@icloud.com, diana Ibrahim diana.ibrahim.006@my.csun.edu, Angel Emodi aoemodi@g.ucla.edu, Negien Shalmani negien.shalmani.470@my.csun.edu

BN

Hi Soizic,

Can you please clarify what you mean about Invitrogen not having extra vials- does that mean that even if we knew which N2 lot was giving the best results, we could not get them because they are no longer available, or do we have a hold on a certain number of vials, and are limited by that?

Harout, if you are getting these emails and can tell us what which N2 was giving the best results, could you please let us know otherwise all the testing that has been done will be for naught.

Thanks,

Ben

On Apr 29, 2024, at 5:48 PM, Soizic Riche <soizic.riche@gmail.com> wrote:

Invitrogen doesn't have extra vials from the lots Harout was testing.

So let me know by tomorrow if the Novitch lab wants vials from the new lot that I'll order. If yes, how many?

Soizic

On Mon, Apr 29, 2024 at 12:32 PM Soizic Riche <soizic.riche@gmail.com> wrote:

Hi all,

I'll ask for a quote for a N2 order.

I am gonna order ~60 vials for the Butler lab.

The Novitch lab took 56 vials from us.

Ben : If it is ok with you, we'll place the order with the Novitch funds.

Does the Novitch lab want to reorder some? Or do you want to take it from the Boyer Invitrogen freezer to just cover your needs, the time the testing is completed ?

Let me know as soon as possible.

Thanks

Soizic

BN

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Subject: Re: N2 order
Date: April 29, 2024 at 9:25 PM
To: Soizic Riche soizic.riche@gmail.com
Cc: Samantha Butler butlersj@ucla.edu, Keith Phan keithdphan@gmail.com, ERIC HEINRICHES eheinrichs@g.ucla.edu, Jessie Butth jebuth51@gmail.com, Natela Baliaouri nvbalia1@ucla.edu, Cendi Ling cendiling@g.ucla.edu, Sandeep Gupta sandeepscience9@gmail.com, Selena Gallardo sgallardo@g.ucla.edu, Yesica Mercado-Ayon mercadoayon@g.ucla.edu, Harout Gulesserian HKG90@icloud.com, diana Ibrahim diana.ibrahim.006@my.csun.edu, Angel Emodi aoemodi@g.ucla.edu, Negien Shalmani negien.shalmani.470@my.csun.edu

Phew. And that makes sense for the back up (though everyone remember that the Butler lab stash is for the Butler lab!).

Harout, can you please share results from the tests that you have done?

On Apr 29, 2024, at 9:19 PM, Soizic Riche <soizic.riche@gmail.com> wrote:

We still have on hold 300 vials for the 3 tested lots! What I meant was that I can't order more vials from those lots because they are not available anymore.

Sorry if that was not clear!

When I order for the Butler lab, I try to have the same lot as the Novitch to back you up if necessary.

Soizic

On Mon, Apr 29, 2024, 9:12 PM BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Hi Soizic,

Can you please clarify what you mean about Invitrogen not having extra vials- does that mean that even if we knew which N2 lot was giving the best results, we could not get them because they are no longer available, or do we have a hold on a certain number of vials, and are limited by that?

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Let me know as soon as possible.

Thanks

Soizic

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: Important - General Leave Information - Harout Gulesserian - HRC0301037
Date: April 30, 2024 at 7:57 AM
To: HGulesserian@mednet.ucla.edu, hkg90@icloud.com

UH

If at any time during your Leave of Absence, you will be on an unpaid leave status on UCLA's payroll you may need to take action to prepare prior to your leave starts, during your leave, and/or upon returning back to work.

Please carefully review the information provided and the action items outlined below. Keep this document for your reference during your leave of absence.

General Information:

1. During your leave of absence without pay, you will not receive a regular payroll check from The University. This will impact your regularly scheduled deductions/loan repayments. Please make the necessary arrangements directly with each vendor/department if needed. Some helpful contact information is provided below should you need to contact these vendors while on leave:
 - **Health or Dependent Care Flexible Spending Account:** Your coverage and contributions end when you go off pay status. You may re-enroll when you return from leave. If you have questions about your flexible spending accounts, please contact the UCPATH Center at 855-982-7284.
 - **Parking:** Transportation Services can be reached at 310-794-7433
 - **403b/457b/Loans:** Fidelity Investments at 866-682-7787
 - **University Credit Union:** 800-828-4510
 - **Learn more**
here: <https://ucnet.universityofcalifornia.edu/forms/pdf/leave-without-pay.pdf>.
2. Benefit Billing Election Form: Please request a Benefit Billing Election Form by contacting UCPATH. UCPATH requests that all employees going on leaves of absence review, complete, and return this form to them. Please carefully review and complete it as appropriate. If you have questions about the "Benefit Billing Election Form," please contact the UCPATH Center at 855-982-7284
3. Direct Payment of Benefits Premiums: In order to keep your benefits intact while on leave without pay, you will need to remit payment for your monthly benefit premiums. The UCPATH Benefits Team will issue a billing statement via US Mail each month. Please watch your mailbox for this statement and follow the instructions carefully to ensure payments are received on time and benefits remain intact. If you have questions about your billing, please contact the UCPATH Center at 855-982-7284.

Special Note: Your Mednet/AD Login is disabled during your leave of absence; you must use your Bruin Online ID to log in to the UCPATH Portal.

- Link to the UCPATH Portal: <http://ucpath.universityofcalifornia.edu/>
- To access the UCPATH Portal during your leave of absence, please follow

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: ACTION REQUIRED - Continuous LOA Request for Own Serious Health Condition - HRC0301037
Date: April 30, 2024 at 7:57 AM
To: HGulesserian@mednet.ucla.edu, hkg90@icloud.com, BNovitch@mednet.ucla.edu

UH

Hello Harout,

I have been made aware of your request for a leave of absence.

In response to your request for a leave of absence for your own serious health condition, we are providing you with information pertaining to the University's Family and Medical Leave (FML) policy.

You will receive a second email from DocuSign with the following form or certification that needs to be filled out:

- **Certification of Health Care Provider for Employee's Serious Health Condition**

Please have your health care provider complete the enclosed Certification. All forms to be completed should be returned to me within 15 calendar days of this request. Failure to provide the required documentation may result in delay or denial of leave.

You can upload your documents to your case by completing the task assigned to you in Employee Experience Center.

You can also see the task under [Employee Experience Center > My To-dos](#)

IMPORTANT:

- **LEAVE UPDATES** - Keep your supervisor/manager and your Leave Analyst informed of any delays on your return date. If there is any need to extend your leave date, you must inform your Leave Analyst before your leave ends by submitting a doctor's note that states your new anticipated return to work date.
- **RETURNING TO WORK** - You must provide a clearance note from your doctor to your Leave Analyst prior to your return to work date. In addition, contact your Leave Analyst when you physically return to work to ensure that your AD Login and timesheet access is reinstated.

*****Important Notice*****

If you have not already received your COVID-19 vaccination series or bivalent vaccine, the University strongly recommends that all members of the University community, except those who have had a severe allergic reaction to a previous dose of the COVID-19 vaccine or any of its components, receive a vaccination to protect against COVID-19 disease as soon as they are eligible as well as receive boosters as needed to stay up-to-date. If you have received your COVID-19 vaccination and wish to upload your vaccination card, click [here](#).

From: UCLA Health Human Resources via DocuSign dse_NA3@docsign.net
Subject: ACTION REQUIRED with DocuSign: Leave of Absence Documentation - Own illness/injury (nonwork related)
Date: April 30, 2024 at 8:07 AM
To: Gulessarian, Harout K. hkg90@icloud.com



UCLA Health Human Resources sent you a document to review and sign.

REVIEW DOCUMENT

UCLA Health Human Resources
HRStaffing@mednet.ucla.edu

As per the indications of the UCLA Health Leave of Absence Team, you have received this document request via Docusign.

Please open the document and print the form or save it as a PDF and ask your Health Care Provider to fill out the necessary information. Once you have the forms completed, please provide it to your leave analyst by uploading it to your case.

You can upload your documents to your case by completing the task assigned to you in Employee Experience Center: You can see the task under Employee Experience Center > My To-dos

Regards,
Leave of Absence Team

Powered by  **docusign**

From: BENNETT NOVITCH bnovitch@g.ucla.edu
Subject: N2 testing results?
Date: April 30, 2024 at 8:26 AM
To: Harout Gulesserian HKG90@icloud.com, Gulesserian, Harout K. HGulesserian@mednet.ucla.edu
Cc: Mark Lucas mlucas@mednet.ucla.edu

BN

Hi Harout,

I'd greatly appreciate it if you could please respond to Soizic and my prior requests about the testing of the N2 supplement lots that you had been working on before you go off the grid on medical leave. All we need is for you to forward any data files that you generated (images or other data files- raw formats are fine), or even just the number of the lot that worked the best.

Thanks,

Ben

From: Moubayed, Vera C. VMoubayed@mednet.ucla.edu
Subject: RE: Inquiry regarding UCLA work related matters
Date: May 2, 2024 at 4:26 PM
To: Harout Gulessarian hkg90@icloud.com

VM

Dear Mr. Gulessarian,

Apologies for my delayed outreach as I must have overlooked this email when it came through.

To initiate a leave of absence, if you have not already done so, please contact your departmental leave analyst, Ms. Helen A. Nguyen at helenanguyen@mednet.ucla.edu.

Please let me know if you have any additional questions.

Thank you.

Vera

Vera Moubayed
Employee Relations Manager
Employee & Labor Relations
UCLA Health, Human Resources
310-775-0704
vmoubayed@mednet.ucla.edu
www.uclahealth.org

From: UCLA Health Employee Relations
<UCLAHealthEmployeeRelations@mednet.ucla.edu>
Sent: Monday, April 29, 2024 9:22 AM
To: Harout Gulessarian <hkg90@icloud.com>; Moubayed, Vera C.
<VMoubayed@mednet.ucla.edu>
Subject: RE: Inquiry regarding UCLA work related matters

Good morning Harout,

 In this email, I am connecting you with Vera Moubayed, Employee Relations manager. She may be able to better assist with your inquiry below.

For questions related to FMLA, please reach out to the Leave of Absence team directly at LLOteam@mednet.ucla.edu.

Thank you,

Derouhe (Deedee) Shegian, MHA
Employee Relations, Coordinator

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Inquiry regarding UCLA work related matters
Date: April 25, 2024 at 11:17 AM
To: Castaneda, Victoria vcastaneda@chr.ucla.edu

HG

Good afternoon Victoria,

I made a request with the department CAO regarding time off effective yesterday and was informed about the following: " ... you can certainly take a medical leave (under FMLA) at any time ..."

Can you kindly provide additional guidance and assistance so I can better understand what exactly I need to do and advance my existing FMLA/Healthcare matters.

At this juncture the FMLA process seems entirely foreign to me. That being said, I just want to thank you so much for your continuous efforts and assistance; all is very deeply appreciated.

Kind regards
Harout

On Mar 6, 2024, at 2:16 PM, Castaneda, Victoria <vcastaneda@chr.ucla.edu> wrote:

Good afternoon Harout,

You can read more about the Office of Ombuds Services [here](#). The Ombudspersons facilitate communication and assist parties in reaching their own mutually acceptable agreements when conflicts arise. Acting as neutrals and committed to confidentiality, the Ombudspersons may gather information on complaints, clarify issues, expedite processes or, when appropriate, initiate mediation.

The Ombuds Office continues to operate in a hybrid fashion with appointments available over zoom and phone, and in-person meetings on a limited basis. To schedule an appointment, please email ombuds@conet.ucla.edu or call (310) 825-7627.

Best,

Victoria Castañeda, SHRM-CP
(she/her/hers)
Employee & Labor Relations Consultant
Mobile (310) 922-1644
vcastaneda@chr.ucla.edu
<image001.png>

From: Castaneda, Victoria vcastaneda@chr.ucla.edu 
Subject: RE: Inquiry regarding UCLA work related matters
Date: April 26, 2024 at 4:04 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: uclahealthemployeerelations@mednet.ucla.edu

VC

Good afternoon Harout,

Thank you for your email. I would recommend connecting with UCLA Health's Employee Relations team so that they can refer you to the appropriate HR representative who can provide you with FML information and the next steps. I have cc'd their general email on this message so that they can respond to you directly.

Best,

Victoria Castañeda, SHRM-CP
(she/her/hers)
Employee & Labor Relations Consultant
Mobile (310) 922-1644
vcastaneda@chr.ucla.edu



From: Harout Gulesserian <hkg90@icloud.com>
Sent: Thursday, April 25, 2024 11:18 AM
To: Castaneda, Victoria <vcastaneda@chr.ucla.edu>
Subject: Re: Inquiry regarding UCLA work related matters

Good afternoon Victoria,

I made a request with the department CAO regarding time off effective yesterday and was informed about the following: "... you can certainly take a medical leave (under FMLA) at any time ..."

Can you kindly provide additional guidance and assistance so I can better understand what exactly I need to do and advance my existing FMLA/Healthcare matters.

At this juncture the FMLA process seems entirely foreign to me. That being said, I just want to thank you so much for your continuous efforts and assistance; all is very deeply appreciated.

Kind regards
Harout

From: UCLA Health Employee Relations UCLAHealthEmployeeRelations@mednet.ucla.edu 
Subject: RE: Inquiry regarding UCLA work related matters
Date: April 29, 2024 at 9:22 AM
To: Harout Gulesserian hkg90@icloud.com, Moubayed, Vera C. VMoubayed@mednet.ucla.edu



Good morning Harout,

By copy of this email, I am connecting you with Vera Moubayed, Employee Relations manager. She may be able to better assist with your inquiry below.

For questions related to FMLA, please reach out to the Leave of Absence team directly at LOAtteam@mednet.ucla.edu.

Thank you,

Derouhe (Deedee) Shegian, MHA

Employee Relations, Coordinator
UCLA Health

310-794-0524
424-946-5681

E-mail: dshegian@mednet.ucla.edu

Employee Relations E-mail: UCLAHealthEmployeeRelations@mednet.ucla.edu

Our People: Best Principles | Best Practices | Best Performance

From: Castaneda, Victoria <vcastaneda@chr.ucla.edu>
Sent: Friday, April 26, 2024 4:04 PM
To: Harout Gulesserian <hkg90@icloud.com>
Cc: UCLA Health Employee Relations
<UCLAHealthEmployeeRelations@mednet.ucla.edu>
Subject: RE: Inquiry regarding UCLA work related matters

Good afternoon Harout,

Thank you for your email. I would recommend connecting with UCLA Health's Employee Relations team so that they can refer you to the appropriate HR representative who can provide you with FML information and the next steps. I have cc'd their general email on this message so that they can respond to you directly.

Best,

Victoria Castañeda, SHRM-CP
(she/her/hers)
Employee & Labor Relations Consultant
Mobile (310) 922-1644
vcastaneda@chr.ucla.edu



From: Moubayed, Vera C. VMoubayed@mednet.ucla.edu
Subject: RE: Inquiry regarding UCLA work related matters
Date: May 2, 2024 at 4:26 PM
To: Harout Gulessarian hkg90@icloud.com

VM

Dear Mr. Gulessarian,

Apologies for my delayed outreach as I must have overlooked this email when it came through.

To initiate a leave of absence, if you have not already done so, please contact your departmental leave analyst, Ms. Helen A. Nguyen at helenanguyen@mednet.ucla.edu.

Please let me know if you have any additional questions.

Thank you.

Vera

Vera Moubayed
Employee Relations Manager
Employee & Labor Relations
UCLA Health, Human Resources
310-775-0704
vmoubayed@mednet.ucla.edu
www.uclahealth.org

From: UCLA Health Employee Relations
<UCLAHealthEmployeeRelations@mednet.ucla.edu>
Sent: Monday, April 29, 2024 9:22 AM
To: Harout Gulessarian <hkg90@icloud.com>; Moubayed, Vera C.
<VMoubayed@mednet.ucla.edu>
Subject: RE: Inquiry regarding UCLA work related matters

Good morning Harout,

 In this email, I am connecting you with Vera Moubayed, Employee Relations manager. She may be able to better assist with your inquiry below.

For questions related to FMLA, please reach out to the Leave of Absence team directly at LLOteam@mednet.ucla.edu.

Thank you,

Derouhe (Deedee) Shegian, MHA
Employee Relations, Coordinator

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: Important - General Leave Information - Harout Gulesserian - HRC0304603
Date: May 7, 2024 at 7:43 AM
To: HGulesserian@mednet.ucla.edu, hkg90@icloud.com

UH

If at any time during your Leave of Absence, you will be on an unpaid leave status on UCLA's payroll you may need to take action to prepare prior to your leave starts, during your leave, and/or upon returning back to work.

Please carefully review the information provided and the action items outlined below. Keep this document for your reference during your leave of absence.

General Information:

1. During your leave of absence without pay, you will not receive a regular payroll check from The University. This will impact your regularly scheduled deductions/loan repayments. Please make the necessary arrangements directly with each vendor/department if needed. Some helpful contact information is provided below should you need to contact these vendors while on leave:
 - **Health or Dependent Care Flexible Spending Account:** Your coverage and contributions end when you go off pay status. You may re-enroll when you return from leave. If you have questions about your flexible spending accounts, please contact the UCPATH Center at 855-982-7284.
 - **Parking:** Transportation Services can be reached at 310-794-7433
 - **403b/457b/Loans:** Fidelity Investments at 866-682-7787
 - **University Credit Union:** 800-828-4510
 - **Learn more**
here: <https://ucnet.universityofcalifornia.edu/forms/pdf/leave-without-pay.pdf>.
2. Benefit Billing Election Form: Please request a Benefit Billing Election Form by contacting UCPATH. UCPATH requests that all employees going on leaves of absence review, complete, and return this form to them. Please carefully review and complete it as appropriate. If you have questions about the "Benefit Billing Election Form," please contact the UCPATH Center at 855-982-7284
3. Direct Payment of Benefits Premiums: In order to keep your benefits intact while on leave without pay, you will need to remit payment for your monthly benefit premiums. The UCPATH Benefits Team will issue a billing statement via US Mail each month. Please watch your mailbox for this statement and follow the instructions carefully to ensure payments are received on time and benefits remain intact. If you have questions about your billing, please contact the UCPATH Center at 855-982-7284.

Special Note: Your Mednet/AD Login is disabled during your leave of absence; you must use your Bruin Online ID to log in to the UCPATH Portal.

- Link to the UCPATH Portal: <http://ucpath.universityofcalifornia.edu/>
- To access the UCPATH Portal during your leave of absence, please follow

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: ACTION REQUIRED - Continuous LOA Request for Own Serious Health Condition - HRC0304603
Date: May 7, 2024 at 7:43 AM
To: HGulesserian@mednet.ucla.edu, hkg90@icloud.com, BNovitch@mednet.ucla.edu

UH

Hello Harout,

I have been made aware of your request for a leave of absence.

In response to your request for a leave of absence for your own serious health condition, we are providing you with information pertaining to the University's Family and Medical Leave (FML) policy.

You will receive a second email from DocuSign with the following form or certification that needs to be filled out:

- **Certification of Health Care Provider for Employee's Serious Health Condition**

Please have your health care provider complete the enclosed Certification. All forms to be completed should be returned to me within 15 calendar days of this request. Failure to provide the required documentation may result in delay or denial of leave.

You can upload your documents to your case by completing the task assigned to you in Employee Experience Center.

You can also see the task under [Employee Experience Center > My To-dos](#)

IMPORTANT:

- **LEAVE UPDATES** - Keep your supervisor/manager and your Leave Analyst informed of any delays on your return date. If there is any need to extend your leave date, you must inform your Leave Analyst before your leave ends by submitting a doctor's note that states your new anticipated return to work date.
- **RETURNING TO WORK** - You must provide a clearance note from your doctor to your Leave Analyst prior to your return to work date. In addition, contact your Leave Analyst when you physically return to work to ensure that your AD Login and timesheet access is reinstated.

*****Important Notice*****

If you have not already received your COVID-19 vaccination series or bivalent vaccine, the University strongly recommends that all members of the University community, except those who have had a severe allergic reaction to a previous dose of the COVID-19 vaccine or any of its components, receive a vaccination to protect against COVID-19 disease as soon as they are eligible as well as receive boosters as needed to stay up-to-date. If you have received your COVID-19 vaccination and wish to upload your vaccination card, click [here](#).

From: UCLA Health Human Resources via DocuSign dse_NA3@docsign.net
Subject: ACTION REQUIRED with DocuSign: Leave of Absence Documentation - Own illness/injury (nonwork related)
Date: May 7, 2024 at 7:52 AM
To: Gulessarian, Harout K. hkg90@icloud.com



UCLA Health Human Resources sent you a document to review and sign.

REVIEW DOCUMENT

UCLA Health Human Resources
HRStaffing@mednet.ucla.edu

As per the indications of the UCLA Health Leave of Absence Team, you have received this document request via Docusign.

Please open the document and print the form or save it as a PDF and ask your Health Care Provider to fill out the necessary information. Once you have the forms completed, please provide it to your leave analyst by uploading it to your case.

You can upload your documents to your case by completing the task assigned to you in Employee Experience Center: You can see the task under Employee Experience Center > My To-dos

Regards,
Leave of Absence Team

Powered by  **docusign**

HG

From: Harout Gulessserian HKG90@icloud.com
Subject: FMLA update
Date: May 14, 2024 at 4:55 PM
To: helennguyen@mednet.ucla.edu, Jackeline Peraza JackelinePeraza@mednet.ucla.edu, Robert Damoiseaux RDamoiseaux@mednet.ucla.edu, Erick Nedd ericknedd03@g.ucla.edu, BENNETT NOVITCH bnovitch@ucla.edu, Mark Lucas MLucas@mednet.ucla.edu, suzanne@cnsi.ucla.edu

Hello Everyone.

I remain unavailable on FMLA leave until at least 15 July, 2024.

Kind regards. Harout

From: Lucas, Mark MLucas@mednet.ucla.edu
Subject: RE: FMLA update
Date: May 14, 2024 at 4:59 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu, Bennett Novitch (bnovitch@g.ucla.edu) bnovitch@g.ucla.edu

ML

Hi, Harout. Thanks for the update. We need you to officially file the FMLA. You have not done so as yet in the UCLA LOAN system. Neither are we in receipt of your doctor's note. We cannot approve a Leave without these items. Please contact me or Helen if you have any questions. Thanks.

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Tuesday, May 14, 2024 4:56 PM
To: helennguyen@mednet.ucla.edu; Peraza, Jackeline <JackelinePeraza@mednet.ucla.edu>; Damoiseaux, Robert <RDamoiseaux@mednet.ucla.edu>; Erick Nedd <ericknedd03@g.ucla.edu>; BENNETT NOVITCH <bnovitch@ucla.edu>; Lucas, Mark <MLucas@mednet.ucla.edu>; suzanne@cnsi.ucla.edu
Subject: FMLA update

Hello Everyone.

I remain unavailable on FMLA leave until at least 15 July, 2024.

Kind regards. Harout

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

From: Lucas, Mark MLucas@mednet.ucla.edu
Subject: Leave
Date: May 15, 2024 at 10:42 AM
To: Harout Gulesserian hkg90@icloud.com

ML

Dear Harout,

Your request for use of FMLA has not been approved as yet. We wanted to remind you that you were provided with 15 days (through May 15, 2024) to submit medical certification. Your absence from work is currently unauthorized and unexcused. Can you please contact us to provide and/or reply to the LOAN system e-mail that was sent on April 30, 2024 from UCLA Health? Thanking you in advance.

Best,
Mark

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

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: Leave
Date: May 16, 2024 at 8:06 AM
To: Lucas, Mark MLucas@mednet.ucla.edu

HG

Dear Mark,

Thank you for your very kind concerns while I remain on FMLA leave; all your kindness is deeply appreciated.

That being said, I must reserve all rights given my understanding, and directly per "UCLAHealthHR" & "LOA team," along with any "Leave Analysts" as my initial FMLA request was in fact arguably approved.

Moreover, there's consistent reinforcement per "UCLA Health" that LOA team in fact received my requisite Healthcare Documentation more than ten [10] days ago and nothing inconsistent was noted in my direction the entire time by: "UCLAHealthHR;" & "LOA team;" or "UCLA Health" for that matter.

That being said, there's an objection in order, as I am at a loss when you state that my absence from work is currently unauthorized and unexcused.

In fact, in reality I timely complied and continue to comply with all instructions per "UCLAHealthHR" & "LOA team" and anything else from the person who LOA Team indicated in writing to me is/was my assigned "Leave Analyst." during all relevant time periods in your email dated 05/14/2024.

Moreover, many attempts were, and are currently being made, timely reaching out and attempting to deliver any and all required Healthcare Documentation for past or present instant extended FMLA leave matters directly to whoever the LOA team specifically indicates to me is my assigned "Leave Analyst."

Also, regarding the "LOAN system" there appears there is nothing required for "LOAN system" under the instructions of "LOA Team" or any instruction from "UCLAHealth," or for that matter from the person "LOA Team" assigned to be my "Leave Analyst."

Therefore, I am at complete and utter loss as to what exactly is going on, but please be insured that from my end there remains dedicated and good faith attempts to comply with all requirements as indicated to me from "UCLAHealthHR" & "LOA team" or the person who LOA Team indicates to me is/was my Leave Analyst.

Seemingly, once the person that LOA Team indicated was my designated Leave Analyst [and whoever that may end up being going forward] as to my new FMLA extension date going forward, I believe that once LOA Team and my appointed Leave Analyst work things out as between themselves, then they will likely inform your side and they will likely inform my side of any updates or supplemental requirements, or any other matters, as well.

Moreover what is even more bizarre is that if my absence from work was not approved, not authorized, or unexcused, then "UCLAHealthHR" & "LOA team" and the person they assigned to be my "Leave Analyst" had so many and numerous opportunities to inform me that my absence from work was not approved, not authorized, or unexcused or at least make objective express demands of my side to inform me if my absence was not approved, not authorized, unexcused or to ask me to provide any other necessary supplemental documentation with a hypothetical declared written and expected return date/dates as designated expressly per the directions of my assigned Leave Analyst, but instead **NOTHING** failed to come through from the "LOA team" or "Leave Analyst".

From: Harout Gulessarian HKG90@icloud.com 
Subject: HRC0301037 Harout Gulessarian LOA FMLA
Date: May 15, 2024 at 9:37 AM
To: VManlutac@mednet.ucla.edu

HG

Dear Leave Analyst,

I am reaching out to you Regarding ticket number HRC0301037 opened on 04/30/2024 by me (Harout Gulessarian) to the UCLA LOA team, to inform you about delays on my return date. There is any need to extend my leave date to at least July 15 2024, consequently I contacted you yesterday on the platform around 10:00am (see screenshots below) with respect to the leave extension.

I am trying to forward the healthcare note to you that states the new anticipated return to work date.

This is a reminder that I "officially filed the FMLA" on 04/30/2024 with ticket number HRC0301037.

Moreover, please advise whether you as my "Leave Analyst" will need anything else from me, or whether you or UCLA need me to provide you [in your capacity as Leave Analyst] or anyone else at UCLA or any other place with any kind of additional information because it remains my understanding that per UCLA Human Resources I am to only forward my Healthcare FMLA note to my "Leave Analyst" [you, Valentino Maltunac] due to Federal HIPPA, California State, and UCLA laws, rules and procedures. I AM AGAIN ATTEMPTING TO FORWARD THE HEALTHCARE NOTE TO YOU TODAY.

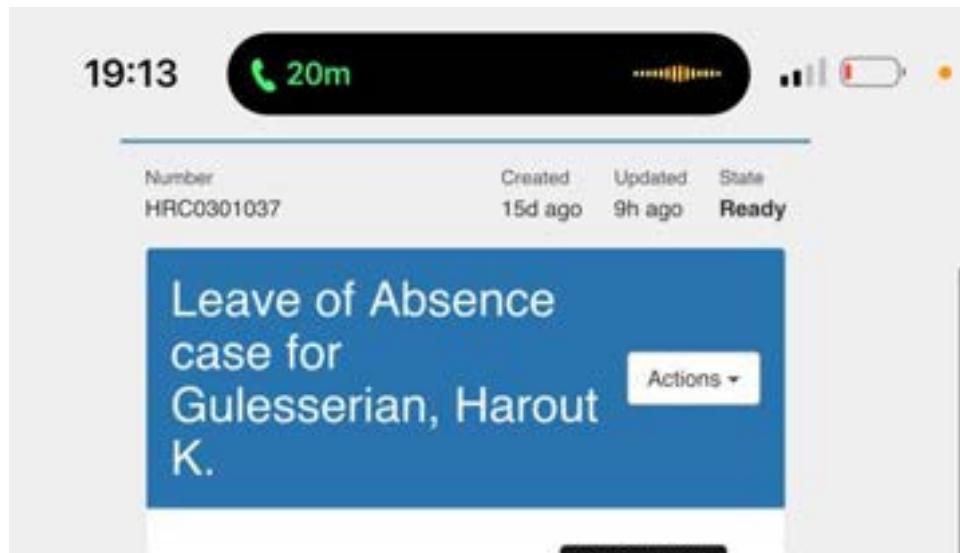
Also, can you please advise whether there is any requirements regarding anything mandatory that I must do as to UCLA LOAN system. If so please forward me the relevant links and contact info for that matter as well.

Please advise to Federal HIPPA, State, and UCLA rules and what is required/mandated of me to do, as time is of the essence and I rather have no time based disruptions because I am doing everything possible on my end to ensure HIPPA Healthcare compliance.

Once again, I appreciate all your time and assistance in advance.

Kind regards,

Harout Gulessarian



From: Manlutac, Valentino VManlutac@mednet.ucla.edu 
Subject: RE: HRC0301037 Harout Gulessarian LOA FMLA
Date: May 15, 2024 at 12:41 PM
To: Harout Gulessarian hkg90@icloud.com

VM

Hello, Harout,

I work with the Dept of Ophthalmology. I think they assigned me to you by mistake. I will reach out to the LOA Team and have them assign you to the correct Leave Analyst for your department.

Thank you,

Valentino T. Manlutac

HR Generalist II

David Geffen School of Medicine at UCLA | Department of Ophthalmology
100 Stein Plaza, Suite 2-267 | Los Angeles, CA 90095 |

(310) 825-4158 

(818) 823-3697 Cell

(310) 206-8403 

Office Hours:

Open 10:00 a.m. - 12:30 p.m.

Closed for Lunch 12:30 p.m. - 1:30 p.m.

Re-open 1:30 p.m. - 4:00 p.m.



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Wednesday, May 15, 2024 9:37 AM
To: Manlutac, Valentino <VManlutac@mednet.ucla.edu>
Subject: HRC0301037 Harout Gulessarian LOA FMLA

Dear Leave Analyst,

I am reaching out to you Regarding ticket number HRC0301037 opened on 04/30/2024 by me (Harout Gulessarian) to the UCLA LOA team, to inform you about delays on my return date. There is any need to extend my leave date to at least July 15 2024, consequently I contacted you yesterday on the platform around 10:00am (see screenshots below) with respect to the leave extension.

I am trying to forward the healthcare note to you that states the new anticipated return to work date.

From: Harout Gulessarian HKG90@icloud.com 
Subject: Case # HRC0301037 Harout Gulessarian
Date: May 15, 2024 at 12:10 PM
To: UCLAHealth-HR@mednet.ucla.edu, LOAteam@mednet.ucla.edu

HG

Good afternoon LOA team,

I am reaching out regarding ticket number HRC0301037 opened on 04/30/2024 by Harout Gulessarian to the UCLA LOA team, to inform you about delays on my return date as I have not heard back from my leave analyst Valentino Maltunac and am being told that I didn't provide the necessary paperwork when I actually did in a timely manner (see screenshots below for proof). I also reached out to inform that there is a need to extend my leave date to at least July 15 2024, consequently I contacted the leave analyst Valentino Maltunac yesterday around 10:00am (see screenshot below) through the platform and via email today in the morning with respect to the leave extension.

I am trying to forward the healthcare note to Valentino Maltunac that states the new anticipated return to work date, and am wondering if I can be forwarded a new docusign certification link for the healthcare provider to update.

This is a reminder that I "officially filed the FMLA" on 04/30/2024 with ticket number HRC0301037 and provided the medical certification that was needed In compliance with the 15 day rule set forth by UCLA (see provided screenshots).

Moreover, please advise whether the office will need anything else from me, or whether UCLA needs me to provide your office or anyone else at UCLA or any other place with any kind of additional information because it remains my understanding that per UCLA Human Resources I am to only forward my Healthcare FMLA note to my "Leave Analyst" [Valentino Maltunac] due to Federal HIPPA, California State, and UCLA laws, rules and procedures.

Also, can you please advise whether there are any requirements regarding anything mandatory that I must do as to the UCLA "LOAN system". If so please kindly forward me the relevant links and contact info for that matter as well

From: LOA Team LOATeam@mednet.ucla.edu 
Subject: RE: Case # HRC0301037 Harout Gulessrian
Date: May 15, 2024 at 12:19 PM
To: Harout Gulessrian hkg90@icloud.com, UCLA Health HR UCLAHealth-HR@mednet.ucla.edu, LOA Team LOATeam@mednet.ucla.edu

LT

Hello Harout,

Please reach out to Manlutac, Valentino as she is your assigned leave analyst. She will be able to assist you.

Her email is VManlutac@mednet.ucla.edu.

Thank you,
LOA Team
UCLA Health Sciences
Phone : (310) 794-0078
Fax : (310) 983-3278
Email : loateam@mednet.ucla.edu

From: Harout Gulessrian <hkg90@icloud.com>
Sent: Wednesday, May 15, 2024 12:10 PM
To: UCLA Health HR <UCLAHealth-HR@mednet.ucla.edu>; LOA Team <LOATeam@mednet.ucla.edu>
Subject: Case # HRC0301037 Harout Gulessrian

Good afternoon LOA team,

I am reaching out regarding ticket number HRC0301037 opened on 04/30/2024 by Harout Gulessrian to the UCLA LOA team, to inform you about delays on my return date as I have not heard back from my leave analyst Valentino Maltunac and am being told that I didn't provide the necessary paperwork when I actually did in a timely manner (see screenshots below for proof). I also reached out to inform that there is a need to extend my leave date to at least July 15 2024, consequently I contacted the leave analyst Valentino Maltunac yesterday around 10:00am (see screenshot below) through the platform and via email today in the morning with respect to the leave extension.

I am trying to forward the healthcare note to Valentino Maltunac that states the new anticipated return to work date, and am wondering if I can be forwarded a new docusign certification link for the healthcare provider to update.

This is a reminder that I "officially filed the FMLA" on 04/30/2024 with

From: LOA Team LOATeam@mednet.ucla.edu 
Subject: RE: Case # HRC0301037 Harout Gulessrian
Date: May 16, 2024 at 10:03 AM
To: Harout Gulessrian hkg90@icloud.com, LOA Team LOATeam@mednet.ucla.edu

LT

Hello,

You are assigned to the school of medicine department, which is not handled by the LOA team. Please reach out to the analyst assigned to your cases.

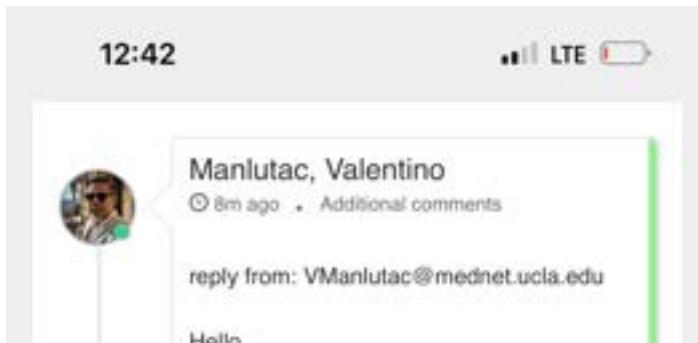
	Search	Search	guless	Search	Search	Search	Search	Search	Search	Search
①	HRC0301037	Ready	Gulessrian, Harout K.	Gulessrian,Harout K.	10582324	Leave of Absence	School of Medicine HR Team	Manlutac, Valentino	04-25-2024	05-16-2024
	HRC0304603	Ready	Gulessrian, Harout K.	Gulessrian,Harout K.	10582324	Leave of Absence	School of Medicine HR Team	Martinez,Joseph	04-25-2024	05-16-2024

Thank you,
LOA Team
UCLA Health Sciences
Phone : (310) 794-0078
Fax : (310) 983-3278
Email : loateam@mednet.ucla.edu

From: Harout Gulessrian <hkg90@icloud.com>
Sent: Wednesday, May 15, 2024 12:43 PM
To: LOA Team <LOATeam@mednet.ucla.edu>
Subject: Re: Case # HRC0301037 Harout Gulessrian

Hello LOA team,

Please advise, thank you.



From: Harout Gulessarian HKG90@icloud.com
Subject: FMLA Harout Gulessarian
Date: May 16, 2024 at 2:33 PM
To: Health Employee Ucla uclahealthemployeerelations@mednet.ucla.edu, LOA Team LOAteam@mednet.ucla.edu, VManlutac@mednet.ucla.edu, UCLAHealth-HR@mednet.ucla.edu, JoeMartinez@mednet.ucla.edu

HG

To whom it may concern,

Since at least 14 May 2024 I have been forwarding the instant referenced FMLA extension Healthcare Certification to UCLA Human Resources [incorporated herein by reference as if more fully attached hereto] extending my previous FMLA leave to 15 July 2024. My previous FMLA leave began on 04/25/2024 under ticket #HRC0301037 opened on 04/30/2024 to the UCLA LOA team.

Please advise to which specific Leave Analyst am I instructed to forward the HIPPA/State of California protected Healthcare Documentation regarding my new FMLA end date, which based on the new Healthcare Documentation, appears to be 15 July 2024. Time is of the essence.

Thank you in advance for all your time and assistance on my ongoing FMLA matter.

Sincerely,
Harout Gulessarian

From: Manlutac, Valentino VManlutac@mednet.ucla.edu
Subject: Automatic reply: FMLA Harout Gulessarian
Date: May 16, 2024 at 2:33 PM
To: Harout Gulessarian hkg90@icloud.com

VM

Hello,

I will be out of the office Wednesday, May 15, 2024 and returning on Monday, May 20, 2024. For urgent matters, please contact Ms. Cassandra Smith at cassandreasmith@mednet.ucla.edu

Thank you,

Valentino

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

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu 
Subject: HR Request HRC0309805 FMLA Harout Gulesserian has been opened
Date: May 16, 2024 at 2:36 PM
To: hkg90@icloud.com

UH



Hello,

Thank you for reaching out. The HR Request below has been opened for you.

Case Number: HRC0309805

Short Description: FMLA Harout Gulesserian

We're reviewing the details of your Request and you'll hear from one of our friendly HR team members soon. In the meantime, if you have any additional information to share with us about this Request, or just want to say hi, simply reply to this email.

Thank you,
UCLA Health Human Resources
Our People: Best Principles | Best Practices | Best Performance

Ref:MSG48313306

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: ACTION REQUIRED - Return to Work - HRC0301037 - Harout Gulessarian
Date: May 23, 2024 at 2:39 PM
To: hkg90@icloud.com, BNovitch@mednet.ucla.edu

UH

Dear Harout,

According to our records, you are scheduled to return to work from your leave of absence on 05-16-2024.

Please advise us if you are returning to work on 05-16-2024 or are scheduled to return to work on another date, by completing the task assigned to you in Employee Experience Center: [HRC0301037](#) You can also see the task under Employee Experience Center > My To-dos

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

If your leave has been extended beyond the anticipated return to work date we will need an updated work status note in order to keep your leave in good standing.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on myUCLAHealth by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with UCLA Occupational Health Services by calling 310-825-6771. You can also book an appointment using your myUCLAHealth portal.

For information on requesting an exemption, please visit
<https://www.uclahealth.org/hr/covidvacexception>

Should you have any questions, please don't hesitate to call me at (424) 440-3429. You can e-mail the completed documents to me at
HelenANguyen@mednet.ucla.edu.

Sincerely,
Helen Nguyen
UCLA Health Sciences



Best people. Best practices. Best performance.

Ref:MSG48471808

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: First Day Back - Reminder - ACTION REQUIRED - HRC0301037 - Harout Gulessarian
Date: May 23, 2024 at 2:39 PM
To: hkg90@icloud.com, BNovitch@mednet.ucla.edu

UH

Dear Harout,

According to our records, you are scheduled to return to work from your leave of absence today, 05-16-2024.

Please advise us if you are back at work today by completing the task assigned to you in Employee Experience Center: [HRC0301037](#). You can also see the task under Employee Experience Center > My To-dos

Your manager, Bennett, may also reach out to me to confirm.

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on myUCLAHealth by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with UCLA Occupational Health Services by calling 310-825-6771. You can also book an appointment using your myUCLAHealth portal.

For information on requesting an exemption, please visit
<https://www.uclahealth.org/hr/covidvacexception>

Should you have any questions, please don't hesitate to call me at (424) 440-3429. You can e-mail the completed documents to me at
HelenANguyen@mednet.ucla.edu.

Sincerely,

Helen Nguyen
UCLA Health Sciences



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Ref:MSG48471813

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: Second Reminder - Action Required: Own Illness Leave of Absence Request - HRC0304603
Date: May 22, 2024 at 7:43 AM
To: hkg90@icloud.com, BNovich@mednet.ucla.edu

UH

Dear Harout,

On 05-07-2024 you were sent an email asking you to provide information related to your request for Family and Medical Leave (FML) for Own illness or injury (non-work related). You were asked to complete and return the following form(s) within 15 calendar days :

- Certification of Healthcare Provider

As of this date, we have not received the completed form and you have not advised us of any reasons for this delay.

Please refer to the DocuSign email sent to you on 05-07-2024 with the attached certification. This form must be completed and returned to me no later than 05-27-2024.

You can upload your documents to your case by completing the task assigned to you in Employee Experience Center: [HRC0304603](#)

You can also see the task under Employee Experience Center > My To-dos

Unless and until the required documentation is provided, your absences will not be designated as FML. Without that designation, your absences will not be protected by FML and may be considered unapproved.

If you have any questions about this, please call me at (310) 206-5016 or email me at JoeMartinez@mednet.ucla.edu.

Sincerely,
Joseph Martinez
UCLA Health Sciences



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Ref:MSG48421989

From: Harout Gulessarian HKG90@icloud.com 
Subject: Harout Gulessarian Case # HRC0301037
Date: May 23, 2024 at 4:55 PM
To: UCLAHealth-HR@mednet.ucla.edu, LOATeam@mednet.ucla.edu, uclahealthemployeerelations@mednet.ucla.edu, dpo@equity.ucla.edu

HG

PLEASE BE PUT ON NOTICE THAT I AM BEING HARMED because someone within UCLA's system is either intentionally or at best negligently misrepresenting facts with the intent to violate my FMLA rights. Below is evidence that I have complied with all necessary FMLA Healthcare Certification, and despite the below attached evidence completed and timely attempts to deliver and ultimate delivery of Healthcare Certification by Harout Gulessarian, some representatives from UCLA are making complete inconsistent and opposite statements than other representatives of UCLA.

As what appears to be a pattern of adverse employment action and a trend to violate my FMLA leave rights the following statements are being repeatedly represented to me (Harout Gulessarian) as facts that are true, but as the evidence below conclusively establishes these representations are in fact not true.

Moreover, after one look at the UCLA System (see the evidence below) it becomes obvious that there is no way anyone can have an honest belief that all required Healthcare Certifications were not timely delivered (or attempted to deliver because UCLA intentionally not taking my delivered Healthcare Certification does not mean that I have not complied with things from my end, so it is obvious that the representations that both required Healthcare Certifications were in fact delivered from me Harout Gulessarian to UCLA timely and that in fact UCLA has the respective Healthcare Certifications in the UCLA system is patently 100% true.

Once I (Harout) delivered my respective Healthcare Certifications to UCLA I Harout reasonably relied on UCLA staff's representation that my Healthcare Certifications are in the UCLA system and received by UCLA, denying this truth, by locking me out of my UCLA health Benefits while I am on FMLA leave I am most vulnerable and most harmed; If you read the instructions to me from UCLA LOA Team and my assigned Leave Analyst and all the other evidence, it is obvious that I Harout relied on these representations and that this in fact is a substantial factor in causing retaliatory and FMLA violation harms to me (Harout) while I remain on FMLA leave. Again please look at the attached evidence and please begin an investigation as to who has locked me out of my UCLA access so as for me not to be able to access UCLA Health needs while I am on FMLA leave.

False statement #1:

"Dear Harout,
On 05-07-2024 you were sent an email asking you to provide information related to your request for Family and Medical Leave (FL) for Own illness or injury (non-work related). You were asked to complete and return the following form(s) within 15 calendar days :
• Certification of Healthcare Provider
As of this date, we have not received the completed form and you have not advised us of any reasons for this delay.."

The evidence below shows that UCLA received and has in its system the "Certification of Healthcare Provider."

False Statement #2

"Dear Harout

From: Moubayed, Vera C. VMoubayed@mednet.ucla.edu
Subject: FW: Harout Gulessarian Case # HRC0301037
Date: May 28, 2024 at 6:57 PM
To: Harout Gulessarian hkg90@icloud.com
Cc: UCLA Health Employee Relations UCLAHealthEmployeeRelations@mednet.ucla.edu

VM

Good evening, Mr. Gulessarian.

Thank you for your email. I understand that your FML has been appropriately processed by your departmental leave analyst, Ms. Helen Nguyen, and all should be in order at this time.

In addition, please understand that suspension of mednet email access during leaves of absence is routine and appropriate.

Lastly, if you wish to report any civil rights violations, you may do so here:
<https://equity.ucla.edu/report-an-incident/>. In addition, your below email will be separately forwarded to UCLA's Civil Rights Office.

Thank you.

Vera

Vera Moubayed
Employee Relations Manager
Employee & Labor Relations
UCLA Health, Human Resources
310-775-0704
vmoubayed@mednet.ucla.edu
www.uclahealth.org

From: UCLA Health Employee Relations
<UCLAHealthEmployeeRelations@mednet.ucla.edu>
Sent: Friday, May 24, 2024 7:55 AM
To: Moubayed, Vera C. <VMoubayed@mednet.ucla.edu>
Subject: FW: Harout Gulessarian Case # HRC0301037

From: Harout Gulessarian <HKG90@icloud.com>
Sent: Thursday, May 23, 2024 4:55 PM
 UCLA Health HR <UCLAHealth-HR@mednet.ucla.edu>; LOA Team <LOA@mednet.ucla.edu>; UCLA Health Employee Relations <UCLAHealthEmployeeRelations@mednet.ucla.edu>; dpo@equity.ucla.edu
Subject: Harout Gulessarian Case # HRC0301037

PLEASE BE PUT ON NOTICE THAT I AM BEING HARMED because someone within UCLA's system is either intentionally or at best negligently misrepresenting facts with the intent to violate my FMLA rights. Below is evidence that I have complied with all necessary FMLA

From: Discrimination Prevention Office dpo@conet.ucla.edu 
Subject: Confidential: To Be Opened by Addressee, Only RE: Harout Gulessarian Case # HRC0301037
Date: May 24, 2024 at 11:10 AM
To: Harout Gulessarian HKG90@icloud.com

DO

Dear Harout Gulessarian,

We have reviewed your email submitted to the Discrimination Prevention Office (“DPO”), and the email does not articulate a policy violation by faculty based upon a protected category that DPO investigates. Our office investigates reports of discrimination or harassment based on race, ancestry, national origin, religion, age, disability and other categories protected by law and University policy. We also investigate complaints of retaliation based on complaining about discrimination or harassment based on those same protected categories.

Consequently, your matter would not be within the purview of our office based on the information provided.

Importantly, our office's assessment is limited to the consideration of University nondiscrimination policy within DPO's jurisdiction and is not a determination about any other potential misconduct. Furthermore, DPO expresses no opinion regarding your ability to pursue this matter with any UCLA affiliated office or any other individual, organization, or outside agency.

We have also included some additional resources below that you may find helpful:

- Family Medical Leave - <https://ucnet.universityofcalifornia.edu/benefits/understanding-your-benefits/roadmaps/taking-a-leave-of-absence/>
- Staff and Faculty Counseling Center (SFCC) - <https://chr.ucla.edu/employee-counseling>
- UCLA Health Human Resources - <https://www.uclahealth.org/human-resources>

Thank you for your raising your concerns with our office. If you have any questions, including questions about this email, please feel free to contact DPO.

Sincerely,

Discrimination Prevention Office | Office of Equity, Diversity and Inclusion
<https://equity.ucla.edu>

This message is intended only for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under law. If you are not the intended recipient, any dissemination, distribution or copying of this communication is strictly unauthorized and prohibited. If you have received this communication in error, please immediately notify the sender by replying to this e-mail message or by telephone. Thank you.

From: Harout Gulessarian <HKG90@icloud.com>
Sent: Thursday, May 23, 2024 4:55 PM

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: Second Reminder - Return to Work - ACTION REQUIRED - HRC0301037 - Harout Gulessserian
Date: May 26, 2024 at 2:40 PM
To: hkg90@icloud.com, BNovitch@mednet.ucla.edu

UH

Dear Harout,

According to our records, you are scheduled to return to work from your leave of absence on 05-16-2024.

Please advise us if you are returning to work on 05-16-2024 or are scheduled to return to work on another date, by completing the task assigned to you in Employee Experience Center: [HRC0301037](#)

You can also see the task under Employee Experience Center > My To-dos

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

If your leave has been extended beyond the anticipated return to work date we will need an updated work status note in order to keep your leave in good standing.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on myUCLAHealth by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with UCLA Occupational Health Services by calling 310-825-6771. You can also book an appointment using your myUCLAHealth portal.

**For information on requesting an exemption, please visit
<https://www.uclahealth.org/hr/covidvacexception>**

Should you have any questions, please don't hesitate to call me at (424) 440-3429. You can e-mail the completed documents to me at HelenANguyen@mednet.ucla.edu.

Sincerely,
Helen Nguyen
UCLA Health Sciences



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Ref:MSG48509919

From: Hakopiannik, Anashe ahakopiannik@equity.ucla.edu 
Subject: Staff Diversity and Compliance
Date: May 29, 2024 at 1:19 PM
To: HKG90@cloud.com
Cc: Saucedo, Vanessa vsaucedo@equity.ucla.edu

AH

Dear Harout,

I am reaching out to you on behalf of [UCLA's Civil Rights Office's](#), Staff Diversity and Equal Employment Opportunity Compliance Office ("SD&C"). SD&C is a neutral and independent office at UCLA that investigates allegations of harassment, discrimination, and related retaliation involving UCLA staff. Discrimination and harassment are prohibited by the [University of California - Anti-Discrimination Policy](#) ("Anti-Discrimination Policy"). Please know that UCLA takes these types of concerns very seriously and has processes in place to assess discrimination concerns.

I'm writing to you because it's come to my attention that you may have concerns of discrimination. We would be happy to speak with you about your concerns and provide you information about our process.

In addition to speaking with us, if you believe that you have been discriminated against or harassed based upon any protected category, or retaliated against based upon a protected activity, you can file a complaint with SD&C.

Protected categories include; race, color, national origin, religion, sex, gender, gender expression, gender identity, gender transition status, pregnancy, physical or mental disability, medical condition (cancer-related or genetic characteristics), genetic information (including family medical history), ancestry, marital status, age, sexual orientation, citizenship, or service in the uniformed services, including protected veterans.

You can file a complaint by filling out the following form ([attached](#)) and emailing it to myself or the SD&C office email (staffdiversity@equity.ucla.edu).

You may also contact the government agencies listed below at any time for information on discrimination or harassment claims based on a protected status and the available options they offer:

California Civil Rights Department (CRD)
320 W. Fourth Street, 10th Floor
Los Angeles, CA 90013
Website: <https://www.calcivilrights.ca.gov/>

Equal Employment Opportunity Commission (EEOC)
[255 East Temple Street, 4th Floor](#)
[Los Angeles, CA 90012](#)
Website: <http://www.eeoc.gov/field/losangeles/>

Please let me know if my office can be of assistance to you or if you would like to schedule a call to discuss our process.

Kind regards

From: UCLA Health HR UCLAHealth-HR@mednet.ucla.edu
Subject: Third Reminder - Return to Work - ACTION REQUIRED - HRC0301037 - Harout Gulessserian
Date: May 29, 2024 at 2:40 PM
To: hkg90@icloud.com, BNovitch@mednet.ucla.edu

UH

Dear Harout,

According to our records, you are scheduled to return to work from your leave of absence on 05-16-2024.

Please advise us if you are returning to work on 05-16-2024 or are scheduled to return to work on another date, by completing the task assigned to you in Employee Experience Center: [HRC0301037](#)

You can also see the task under Employee Experience Center > My To-dos

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

If your leave has been extended beyond the anticipated return to work date we will need an updated work status note in order to keep your leave in good standing.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on myUCLAHealth by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with UCLA Occupational Health Services by calling 310-825-6771. You can also book an appointment using your myUCLAHealth portal.

**For information on requesting an exemption, please visit
<https://www.uclahealth.org/hr/covidvacexception>**

Should you have any questions, please don't hesitate to call me at (424) 440-3429. You can e-mail the completed documents to me at HelenANguyen@mednet.ucla.edu.

Sincerely,
Helen Nguyen
UCLA Health Sciences



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Ref:MSG48570724

From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu ✓
Subject: HRC0301037 LOA - Harout Gulesserian
Date: May 24, 2024 at 2:03 PM
To: Harout Gulesserian hkg90@icloud.com

HN

Hi Harout,

My name is Helen and I'm the HR Analyst for Neurobiology. I am your official Leave Analyst while you are taking time off. I am following up on your LOA case #HRC0301037. You filed for leave of absence from April 24, 2024 to May 15, 2024 (now extended to July 15, 2024). I have attached the Leave form that you will need to fill out and return back to me by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

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



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



Designation_Do
cumen...es.pdf

From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu 
Subject: RE: HRC0301037 LOA - Harout Gulessrian
Date: May 29, 2024 at 4:51 PM
To: Harout Gulessrian hkg90@icloud.com

HN

Hi Harout,

I am following up with you on your Leave request. As of today's date, I have not received your completed designation form for your leave of absence. Please note that I will need your documents to process your leave, please return the documents by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

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



From: Nguyen, Helen A.
Sent: Friday, May 24, 2024 2:03 PM
To: Harout Gulessrian <hkg90@icloud.com>
Subject: HRC0301037 LOA - Harout Gulessrian

Hi Harout,

My name is Helen and I'm the HR Analyst for Neurobiology. I am your official Leave Analyst while you are taking time off. I am following up on your LOA case #HRC0301037. You filed for leave of absence from April 24, 2024 to May 15, 2024 (now extended to July 15, 2024). I have attached the Leave form that you will need to fill out and return back to me by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

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



From: Harout Gulessserian HKG90@icloud.com
Subject: Re: HRC0301037 LOA - Harout Gulessserian
Date: May 31, 2024 at 12:41 AM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu

HG

Hello Helen,

On 05/28/2024 I received confirmation from Employee Relations Management that my FML was appropriately processed by you as the new leave analyst and all should be in order at this time.

Regarding the document there appear to some issues:

First, it appears my Healthcare Providers indicated that they need to see the attached "job description". The form states "A job description listing the essential functions of your position is attached to the Return to Work Certification" but the Healthcare Providers indicated that in fact no job description listing essential functions is on the document. Can you kindly attach the job description for the Healthcare Providers purposes and extend the 5/31/24 date due to the Healthcare providers earliest availability.

Second, the part of the document stating: "Document For block leaves: Start date: Anticipated End Date: Return to Work Date:" The dates there appear inconsistent from the part of the document that references an FML end date of "May 15, 2024." Instead, UCLA Health HR and LOA and Employee relations have received the updated note stating a return date of July 15 2024.

Finally, the portion of the document indicates the following: "Once we obtain the information from you as specified above, we will inform you, within 5 business days, whether your leave will be designated as FML and count towards your FML leave entitlement. Meanwhile, WE HAVE PROVISIONALLY DESIGNATED YOUR LEAVE AS FML. If you have any questions, please do not hesitate to contact:" I would like to call your attention to two matters. Firstly, the Healthcare Certification regarding the extension of the initial approved FML was both timely forwarded to my assigned leave analyst on the LOA system Valentino and his Co Leave Analyst Cassandra and appears approved based on correspondence of UCLA Employee Relations Management; moreover, more importantly the Healthcare Certification was further evidenced and uploaded in the UCLA LOA system on 05/03/2024 and it appears the matters of extension (uploaded 5/14/2024) approval are already approved by UCLA.

Thank you,
Harout Gulessserian

On May 29, 2024, at 16:51, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

I am following up with you on your Leave request. As of today's date, I have not received your completed designation form for your leave of absence. Please note that I will need your documents to process your leave, please return the documents by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

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
<image001.png>

From: Nguyen, Helen A.
Sent: Friday, May 24, 2024 2:03 PM
To: Harout Gulessserian <hkg90@icloud.com>
Subject: HRC0301037 LOA - Harout Gulessserian

From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu 
Subject: RE: HRC0301037 LOA - Harout Gulesserian
Date: May 31, 2024 at 12:47 PM
To: Harout Gulesserian hkg90@icloud.com

HN

Hi Harout,

See attached your job description to provide to your Healthcare Provider. Your request to extend the designation document have been extended to June 7, 2024. The dates for the document stating two different dates are correct. The first date reflects the updated leave of absence you have notified us in your anticipated return date of 7/15/24. The second date reflects when you initially notified the University on 4/30/24 of your leave before the extension. I have noted in your case that you have notified us of your leave being extended as of May 16, 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



From: Harout Gulesserian <hkg90@icloud.com>
Sent: Friday, May 31, 2024 12:42 AM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulesserian

Hello Helen,

On 05/28/2024 I received confirmation from Employee Relations Management that my FML was appropriately processed by you as the new leave analyst and all should be in order at this time.

Regarding the document there appear to some issues:

First, it appears my Healthcare Providers indicated that they need to see the attached "job description". The form states "A job description listing the essential functions of your position is attached to the Return to Work Certification" but the Healthcare Providers indicated that in fact no job description listing essential functions is on the document. Can you kindly attach the job description for the Healthcare Providers purposes and extend the 5/31/24 date due to the Healthcare providers earliest availability.

Second, the part of the document stating: "Document For block leaves: Start date: Anticipated End Date: Return to Work Date." The dates there appear inconsistent from the part of the document that references an FML end date of "May 15, 2024." Instead, ~~UCLA Health HR and LOA and Employee Relations have received the updated info~~

From: Harout Gulessarian HKG90@icloud.com 
Subject: Re: HRC0301037 LOA - Harout Gulessarian
Date: June 6, 2024 at 5:57 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>, UCLAHealth-HR@mednet.ucla.edu
Bcc: Marina Samson <MSamson@imwlaw.com>

HG

Dear Helen,

As per my rights as an employee at UCLA, I would like to request in the entirety my complete employment file. Please provide any and all records from the start of my first interaction with UCLA, without limits including my internship in September 2021 up to the current date of this instant email; moreover, without limitations, insure to include any and all FMLA materials existing or otherwise filed under my name. Thank you in advance for your assistance; your time and efforts are deeply appreciated.

Also, please identify whether these files will be mailed electronically or physically, as I prefer both electronically and a physical set to be mailed to me within the next 5 working days, to the extent possible.

Furthermore, I would like to bring to your attention some matters of concern regarding my employment status and information forwarded to me thus far.

Firstly, regarding the document titled "SRA I Novitch 06/22" the "job description" materials furnished for my Healthcare Provider appears to be outdated; in fact, the document is referencing the year 2011 and the identifying name of another individual, not merely myself.

I kindly request an updated more accurate version, if available.

Additionally, I am confused by the completion of the designation form, as it is the first two pages of the document you recently sent me.

These pages request a healthcare provider certification, but it must be pointed out that I have prior duly provided this material to UCLA and UCLA seemingly approved this via the employee task portal, among other places.

That being said, I must highlight that I no longer have access to this necessary UCLA portal, despite UCLA's expectation for me to upload healthcare-related documents so as to comply with university policies. By design, this is seemingly placing me in an impossible position.

Furthermore, there appears written confirmation from the UCLA Health Employee Relations Department that the tasks requested and required of me by you are already completed.

Moreover, as a member of a collective bargaining unit through my union, please edify me; the issue is whether, I am entitled to utilize my accrued vacation and sick hours for FMLA purposes, as stipulated in my contract. I am in a hardship due to my FMLA, and given my Leave and Care issues, I find it perplexing as to why I am only seemingly now being offered this service, if at all, nearly a month into my FMLA leave, despite the fact it I seemingly remain eligible to use these hours for up to 8 weeks. Basically, I have not received any payment nor received guidance from UCLA on how to proceed to obtain payment during this challenging Healthcare leave period. Furthermore, I am looking forward to undertake additional efforts to comply with UCLA's demands for document uploading from me, but first please understand that I am removed from that system.

In conclusion, I kindly request your prompt attention to these matters and clarification on the process moving forward. Additionally, I would appreciate if you could specify whether the requested files will be provided electronically or physically, along with an estimated time frame pursuant to my sincere and needed request.

Thanks,
Harout Gulessarian

On May 31, 2024, at 12:47, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu 
Subject: RE: HRC0301037 LOA - Harout Gulessarian
Date: June 10, 2024 at 4:13 PM
To: Harout Gulessarian hkg90@icloud.com

HN

Hi Harout,

As requested, attached is the electronic personnel file. As per your leave of absence, your leave is currently being worked on until I have received your paperwork. If you have submitted paperwork that is not already in your case files, please send them my way, so I can upload them to your case. As of today's date, you have not returned the designation document with the additional extension as requested. To stay in compliant as we work on your LOA case, please complete the designation document at your earliest. In the designation document, the document states you have available usage to use vacation and sick leave hours for your FMLA. In order to use your hours, you will need to communicate that you would like to use them to me. Please return the designation document for us to move to the next step.

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



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Thursday, June 6, 2024 5:57 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>; UCLA Health HR <UCLAHealth-HR@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulessarian

Dear Helen,

As per my rights as an employee at UCLA, I would like to request in the entirety my complete employment file. Please provide any and all records from the start of my first interaction with UCLA, without limits including my internship in September 2021 up to the current date of this instant email; moreover, without limitations, insure to include any and all FMLA materials existing or otherwise filed under my name. Thank you in advance for your assistance; your time and efforts are deeply appreciated.

Also, please identify whether these files will be mailed electronically or physically, as I prefer both electronically and a physical set to be mailed to me within the next 5 working days, to the extent possible.

Furthermore, I would like to bring to your attention some matters of concern regarding my

From: Harout Gulessrian HKG90@icloud.com 
Subject: Re: HRC0301037 LOA - Harout Gulessrian
Date: June 11, 2024 at 4:56 PM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu
Bcc: chr@chr.ucla.edu, Victoria Castaneda vcastaneda@chr.ucla.edu

HG

Dear Helen,

Thank you for your message. I would like to address a few points regarding my leave of absence documentation:

- 1. Designation Document:** It's important to note that the designation document was signed by yourself, Helen, not by me. Additionally, there is nowhere for me to sign a document, nor was there a request or need for me to do so. I confirm that I agree with using my vacation and sick hours for FMLA, as indicated by your signature. Please ensure that my pay is retroactively adjusted to reflect this usage, and I receive the appropriate back pay.
- 2. Document Submission:** Once again, it is imperative that UCLA receives NOTICE that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this remains a long standing event, and given UCLA is in the exclusive control of UCLA's electronic servers and thus the portals I submit, yet again, that all necessary paperwork has already been submitted and should be in my case files.
- 3. Delay in Service:** It has been well over a month since I initiated this process, and I find it concerning that this service is only being offered now. I expect this matter to be expedited, investigated, and corrected.
- 4. Access to the Portal:** Given that all necessary documents have been provided in a timely manner by me, Harout Gulessrian, I once again ask to regain access to upload information to the portal. It's not fair to expect document uploading when UCLA stripped away access, which is an impossible task to ask of an employee.
- 5. Access to FMLA Paperwork:** Notice that I again am requesting any and all all FMLA documents or electronic files of any kind, whether completed or not, to be presented to me in one file that is current up to the time of this email. I believe these are my rights and should not be denied, as such I am making a 2nd notice regarding my request.
- 6. NOTICE** Regarding many and numerous prior requested by me; Harout Gulessrian, (06/06/24), but yet to be delivered to me; Harout Gulessrian, include, but are not limited to the following: all FMLA documents whether completed or not, complete employee file with the patent acknowledgment agreement including all pages not just the first page. Also, please update my email address to the correct email address: HGGulessrian@mednet.UCLA.edu

Once again, please ensure that my leave of absence is processed promptly, that I receive the back pay for up to 8 weeks of FMLA leave, and that the patent acknowledgment form has the second page attached to my employee files, updated and resent to me; I reserve all rights, make zero waivers, zero admissions, and I sincerely thank you for your time and assistance.

Thanks,
Harout Gulessrian



From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu ✓
Subject: RE: HRC0301037 LOA - Harout Gulessarian
Date: June 13, 2024 at 10:22 AM
To: Harout Gulessarian hkg90@icloud.com

HN

Hi Harout,

As of your leave from 4/24/24, you have 266.22 hours of vacation and sick leave accruals combined. You are covered to be paid from 4/24/24 to 6/7/24 with a total leave usage of 264.00 hours. Please confirm if you would like to use your leave balances to cover these dates mentioned (4/24/24 to 6/7/24). Thereafter, you will have extinguished your accrued leave. You will need to either apply for disability for the remainder of your leave or take the remaining time without pay. Can you please advise?

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



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, June 11, 2024 4:56 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulessarian

Dear Helen,

Thank you for your message. I would like to address a few points regarding my leave of absence documentation:

1. Designation Document: It's important to note that the designation document was signed by yourself, Helen, not by me. Additionally, there is nowhere for me to sign a document, nor was there a request or need for me to do so. I confirm that I agree with using my vacation and sick hours for FMLA, as indicated by your signature. Please ensure that my pay is retroactively adjusted to reflect this usage, and I receive the appropriate back pay.

2. Document Submission: Once again, it is imperative that UCLA receives NOTICE that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this remains a long standing event, and given UCLA is in the exclusive control of UCLA's electronic servers and thus the

From: Harout Gulessarian HKG90@icloud.com 
Subject: Re: HRC0301037 LOA - Harout Gulessarian
Date: June 20, 2024 at 6:18 AM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu
Bcc: Victoria Castaneda vcastaneda@chr.ucla.edu, chr@chr.ucla.edu

HG

Dear Helen,

Thank you for your message. As my previous email had mentioned, yes, please use 264 of my vacation/sick hours accrued for FMLA back pay from the dates you mentioned. If this resource is exhausted, please continue the remaining of my leave as unpaid unless there are other options of remuneration. Additionally, please take all actions necessary and further advise me on whether I need to take any other steps to ensure my healthcare plans remain in effect during this time while I am actively using the healthcare plans on FMLA leave.

Next, while you addressed item #3 from my previous email, it seems your email does not address the remaining concerns which I raised and requested specific items and clarification on. This is the third time I am requesting any and all of my documents including FMLA complete/incomplete documents. Please see my prior email dated [06/11/24], which I am reattaching for easier clarification:

1 [“Dear Helen,

1 Thank you for your message. I would like to address a few points regarding my leave of absence documentation:

1 1. Designation Document: It's important to note that the designation document was signed by yourself, Helen, not by me. Additionally, there is nowhere for me to sign a document, nor was there a request or need for me to do so. I confirm that I agree with using my vacation and sick hours for FMLA, as indicated by your signature. Please ensure that my pay is retroactively adjusted to reflect this usage, and I receive the appropriate back pay.

1 2. Document Submission: Once again, it is imperative that UCLA receives NOTICE that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this remains a long standing event, and given UCLA is in the exclusive control of UCLA's electronic servers and thus the portals I submit, yet again, that all necessary paperwork has already been submitted and should be in my case files.

1 3. Delay in Service: It has been well over a month since I initiated this process, and I find it concerning that this service is only being offered now. I expect this matter to be expedited, investigated, and corrected.

1 4. Access to the Portal: Given that all necessary documents have been provided in a timely manner by me, Harout Gulessarian, I once again ask to regain access to upload information to the portal. It's not fair to expect document uploading when UCLA stripped away access, which is an impossible task to ask of an employee.

1 5. Access to FMLA Paperwork: Notice that I again am requesting any and all all FMLA documents or electronic files of any kind, whether completed or not, to be presented to me in one file that is current up to the time of this email. I believe these are my rights and should not be denied, as such I am making a 2nd notice regarding my request.

1 6. NOTICE Regarding many and numerous prior requested by me: Harout Gulessarian

From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu ✓
Subject: RE: HRC0301037 LOA - Harout Gulesserian
Date: June 28, 2024 at 9:44 AM
To: Harout Gulesserian hkg90@icloud.com

HN

Hi Harout,

Per your confirmation, I have processed your FMLA leave paid to you from 4/24/24 to 6/7/24 with a total of 264.00 hours of vacation and sick leave with a remainder of 2.22 hours in your leave balance. I have attached the following files as you have requested. Please see attached:

- State Oath and Patent Acknowledgement Form page 2
- LOA Files

If you would like assistance to upload your files to your cases, please reach out to the LOA Team at: loateam@mednet.ucla.edu.

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



From: Harout Gulesserian <hkg90@icloud.com>
Sent: Thursday, June 20, 2024 6:18 AM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulesserian

Dear Helen,

Thank you for your message. As my previous email had mentioned, yes, please use 264 of my vacation/sick hours accrued for FMLA back pay from the dates you mentioned. If this resource is exhausted, please continue the remaining of my leave as unpaid unless there are other options of remuneration. Additionally, please take all actions necessary and further advise me on whether I need to take any other steps to ensure my healthcare plans remain in effect during this time while I am actively using the healthcare plans on FMLA leave.

Next, while you addressed item #3 from my previous email, it seems your email does not address the remaining concerns which I raised and requested specific items and clarification on. This is the third time I am requesting any and all of my

From: UCLA Health Human Resources via DocuSign dse_NA3@docusign.net
Subject: Voided: ACTION REQUIRED with DocuSign: Leave of Absence Documentation - Own illness/injury (nonwork related)
Date: June 21, 2024 at 7:57 AM
To: Gulessrian, Harout K. hkg90@icloud.com



UCLA Health Human Resources voided ACTION REQUIRED
with DocuSign: Leave of Absence Documentation - Own
illness/injury (nonwork related).

UCLA Health Human Resources
HRStaffing@mednet.ucla.edu

ACTION REQUIRED with DocuSign: Leave of Absence Documentation - Own
illness/injury (nonwork related) has been voided for the following reason:
Envelope has expired.

Powered by  **docusign**

Envelope ID
e8949e62-b06c-4951-bc07-1f127efa67e4

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Questions about the Document?

If you need to modify the document or have questions about the details in the document, please reach out to the sender by emailing them directly.

Stop receiving this email

From: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu 
Subject: ACTION REQUIRED - Return to Work - Harout Gulesserian - HRC0301037
Date: July 8, 2024 at 5:16 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: Novitch, Bennett BNovitch@mednet.ucla.edu

HN

Hello Harout,

According to our records, you are scheduled to return to work from your leave of absence on 07-15-2024.

Please advise us if you are returning to work on 07-15-2024 or are scheduled to return to work on another date, by completing the task assigned to you in Employee Experience Center: [HERE](#).

You can also see the task under Employee Experience Center > My To-dos

If your return to work date is undetermined at this time, please indicate NO.

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

If your leave has been extended beyond the anticipated return to work date we will need an updated work status note in order to keep leave in good standing.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on [myUCLAHealth](#) by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with [UCLA Occupational Health Services](#) by calling 310-825-6771. You can also book an appointment using your [myUCLAHealth](#) portal.

For information on requesting an exemption, please visit <https://www.uclahealth.org/hr/covidvacexception>

If you have any questions about this, please call me at (424) 440-3429 or email me at HelenANguyen@mednet.ucla.edu

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



July 16 2024 Helen Nguyen receives healthcare documentation from Harout for the need to extend his FMLA.

The screenshot shows an email from Helen Nguyen to Harout Guleeserian. The subject line is "RE: ACTION REQUIRED - Return to Work - Harout Guleeserian - HRC0301037". The email body contains a message from Helen, a Human Resources Analyst at the David Geffen School of Medicine at UCLA, dated July 16, 2024. She states that she has provided her doctor's note and asks for confirmation that it is valid. She also asks for an updated work status note to be uploaded to her file. The message ends with a request for Harout to upload the note to the Employee Experience Center.

False statements made by Helen Nguyen

The screenshot shows an email from Helen Nguyen to Harout Guleeserian. The subject line is "RE: ACTION REQUIRED - Lack of Documentation - Harout Guleeserian - HRC0301037". The email body contains a message from Helen, a Human Resources Analyst at the David Geffen School of Medicine at UCLA, dated July 23, 2024. She states that she has not received an updated return-to-work date from the doctor's note and asks for one to be provided by July 24, 2024. She also asks for the task to be completed in the Employee Experience Center.

Hi Harout,

The last medical note we received from you covered you through [7/15/24].

As of 07-23-2024, I have not received an updated returned to work date from your Doctor's Note.

We must receive an updated work status note by 7/24/24. The doctor's note must include a Return to Work date.

Your Leave of Absence is considered unauthorized until we confirm receipt of an updated work status note by 7/24/24.

Please upload this documentation by completing the task assigned to you in Employee Experience Center: [HERE](#)

You can also see the task under Employee Experience Center > My To-dos

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



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

To which I had to object

 **Harout Gulessarian** July 24, 2024 at 5:05 PM
Re: ACTION REQUIRED - Lack of Documentation - Harout Gulessarian - HRC0301037 
To: Nguyen, Helen A., Bcc: chr@chr.ucla.edu, LOA Team [Details](#)



Hi Helen,

This email serves as notice that there is a deliberate or negligent misrepresentation of facts within UCLA's system that aims to violate my FMLA rights.

I have complied with all necessary FMLA Healthcare Certification requirements and have provided the required documentation. Despite the evidence of timely delivery of Healthcare Certification by myself to UCLA representatives, representatives from UCLA are making statements that are completely inconsistent with the truth. If my access to upload documents were reinstated as your email suggests, these documents would already be in the system and would not be used against me. They now have been sent via certified mail.

To address your email:

- I submitted my documents for the extension, which you confirmed receiving and uploading on 7/16/2024. Since I have been stripped of my access to upload these documents (well over a month and half now and to which you are/were fully aware of), you are responsible for uploading them to my portal. If there was any negligence in uploading the document, it is not my fault and should not be used against me.
- The extension note indicated a three-week period rather than a specific date, yet you now claim you never received the initial extension note. The last medical note you received covered me through 07/15/24 plus an additional three weeks, as stated in the doctor's note. As of 07/23/2024, you claim not to have received an updated return-to-work date from my doctor. However, I have provided all necessary documentation as required. You then requested an updated note with a specific return date at my earliest convenience. See your response below.

On 07/16/2024, in email you stated: "Thank you for providing the doctor's note. I have uploaded this to your case. I would like to ask for clarification from the doctor in terms of your anticipated to return to work date following the guideline of "3 weeks". Please advise at your earliest so I can update the new anticipated return to work date on your case."

This miscommunication must be rectified immediately to ensure my rights under FMLA are upheld. All of my healthcare documents were sent to you via email or uploaded to the portal by myself initially, and now also sent to you via certified mail. Please acknowledge receipt of my documents and confirm my extended leave status as previously indicated by email.

Now, if my FMLA is past the 12 week point do I need to fill out any other documentation to keep myself in full compliance with the universities rules and policies? Please kindly let me know so I can continue complying with the rules and policies of the university, thanks.

Kind regards,
Harout Gulessarian

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



From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Leave of Absence Return to Work Notice Reminder

Date: August3,2024at4:59PM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu

Bcc: chr@chr.ucla.edu, LOA Team LOAteam@mednet.ucla.edu

Dear Helen,

I am writing to address the recent issues regarding my FMLA leave and the necessary documentation.

On July 16, 2024, I provided an updated Doctor's Note (see below).

 **Harout Gulessarian**
Re: ACTION REQUIRED - Return to Work - Harout Gulessarian - HRC0301037
To: Nguyen, Helen A., Bcc: chr@chr.ucla.edu Sent - iCloud - July 16, 2024 at 7:04 AM [Details](#)

Hi Helen,

Per your request, provided below is an updated healthcare note. I don't have uploading access again, so please ensure this is uploaded to my file.

If possible, will you send me an update once you actually upload the file to my case? I'm doing everything I can to stay in full compliance with the procedures, rules, and policies set forth by the university. Thank you for your attention to these matters.



July 13th, 2024

To Whom It May Concern,

Mr Harout Gulessarian is our patient, and has been under our care at EB PSYCHOTHERAPY since April 2023. Mr Gulessarian is currently actively engaged in treatment for his both mental health symptoms. Due to the nature and intensity of his complaints and the continued functional limitations imposed on him by his mental health diagnosis, Mr Gulessarian has been advised to extend his leave from his adult duties for a period of 3 weeks, so he can continue to concentrate on his treatment with the goal of restoring his overall mental health.

For anything further, please contact us at Office@ebpsychotherapy.com or at 404 - 248 - 7727.

Sincerely,



Dr Elena Bagoutdin (PhD)
Clinical Psychologist
PSY22542

EB Psychotherapy
Clinical Director

Kind regards,
Harout

To which you responded back confirming receipt of the note:

The screenshot shows an email interface with various icons at the top. The message details are as follows:

HN Nguyen, Helen A.
RE: ACTION REQUIRED - Return to Work - Harout Gulessarian - HRC0301037
To: Harout Gulessarian

Siri found new contact info: Helen A. Nguyen HelenANguyen@mednet.ucla.edu

add...

Hi Harout,

Thank you for providing the doctor's note. I have uploaded this to your case. I would like to ask for clarification from the doctor in terms of your anticipated return to work date following the guideline of "3 weeks". Please advise at your earliest so I can update the new anticipated return to work date on your case.

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



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, July 16, 2024 7:05 AM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: ACTION REQUIRED - Return to Work - Harout Gulessarian - HRC0301037

Hi Helen,

Per your request, provided below is an updated healthcare note. I don't have uploading access again, so please ensure this is uploaded to my file.

If possible, will you send me an update once you actually upload the file to my case? I'm doing everything I can to stay in full compliance with the procedures, rules, and policies set forth by the university. Thank you for attending to these matters.

Despite this, on July 23, 2024, you erroneously stated that I had not submitted the required documentation for my healthcare leave extension. You subsequently requested an updated letter by July 24, 2024 (see below).



Nguyen, Helen A.

RE: ACTION REQUIRED - Lack of Documentation - Harout Gulessarian - HRC0301037

To: Harout Gulessarian

July 23, 2024 at 2:49 PM



Hi Harout,

The last medical note we received from you covered you through [7/15/24].

As of 07-23-2024, I have not received an updated returned to work date from your Doctor's Note.

We must receive an updated work status note by 7/24/24. The doctor's note must include a Return to Work date.

Your Leave of Absence is considered unauthorized until we confirm receipt of an updated work status note by 7/24/24.

Please upload this documentation by completing the task assigned to you in Employee Experience Center: [HERE](#)

You can also see the task under Employee Experience Center > My To-dos

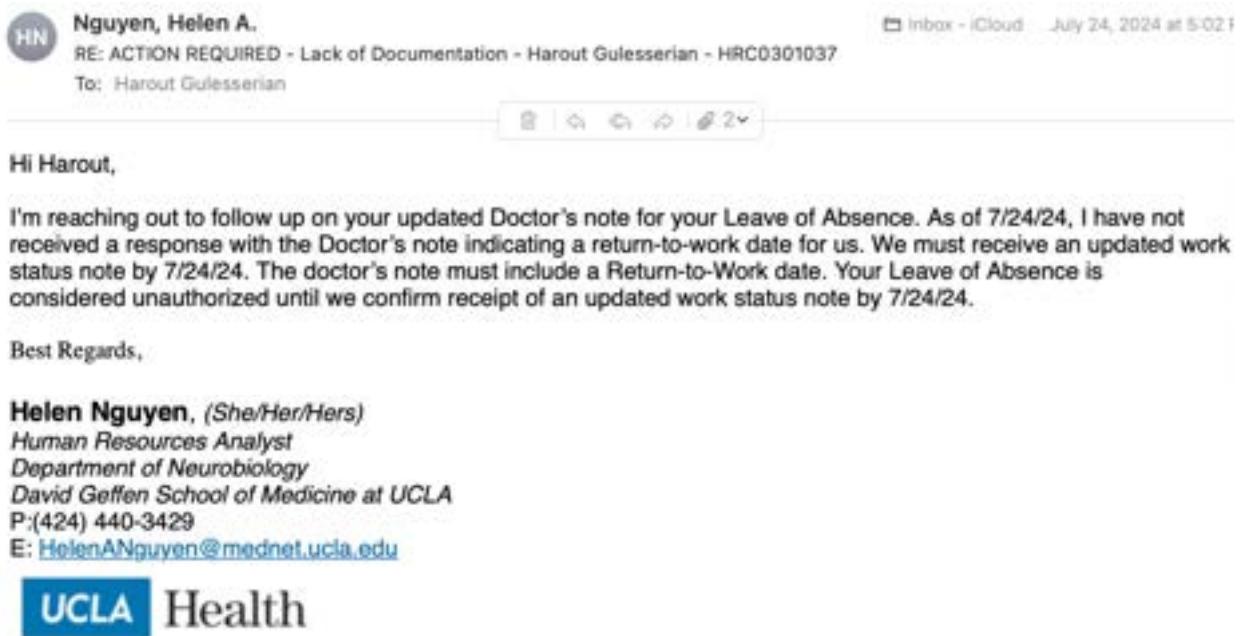
Best Regards,

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



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

The following day again you reached out asking for an updated doctors note (see below).



Hi Harout,

I'm reaching out to follow up on your updated Doctor's note for your Leave of Absence. As of 7/24/24, I have not received a response with the Doctor's note indicating a return-to-work date for us. We must receive an updated work status note by 7/24/24. The doctor's note must include a Return-to-Work date. Your Leave of Absence is considered unauthorized until we confirm receipt of an updated work status note by 7/24/24.

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

UCLA Health

I respectfully responded back (See below) stating my compliance with all the requirements required by me and despite my efforts to constantly remain in compliance with the Universities rules, polices, and regulations I have not had access to my portal for uploading healthcare documents since someone from UCLA removed my document uploading privileges. However, the above email suggests that I should have been able to upload these documents to the Employee Experience Center portal the entire time during my FMLA leave. Despite you being fully aware of this issue, the issue was never addressed in any of your communications.



Harout Gulessarian

Re: ACTION REQUIRED - Lack of Documentation - Harout Gulessarian - HRC0301037
To: Nguyen, Helen A. Bcc: chr@chr.ucla.edu, LOA Team

Sent - iCloud July 24, 2024 at 5:05 PM

[Details](#)

Hi Helen,

This email serves as notice that there is a deliberate or negligent misrepresentation of facts within UCLA's system that aims to violate my FMLA rights.

I have complied with all necessary FMLA Healthcare Certification requirements and have provided the required documentation. Despite the evidence of timely delivery of Healthcare Certification by myself to UCLA representatives, representatives from UCLA are making statements that are completely inconsistent with the truth. If my access to upload documents were reinstated as your email suggests, these documents would already be in the system and would not be used against me. They now have been sent via certified mail.

To address your email:

* I submitted my documents for the extension, which you confirmed receiving and uploading on 7/16/2024. Since I have been stripped of my access to upload these documents (well over a month and half now and to which you are/were fully aware of), you are responsible for uploading them to my portal. If there was any negligence in uploading the document, it is not my fault and should not be used against me.

* The extension note indicated a three-week period rather than a specific date, yet you now claim you never received the initial extension note. The last medical note you received covered me through 07/15/24 plus an additional three weeks, as stated in the doctor's note. As of 07/23/2024, you claim not to have received an updated return-to-work date from my doctor. However, I have provided all necessary documentation as required. You then requested an updated note with specific return date at my earliest convenience. See your response below.

On 07/16/2024, in email you stated: "Thank you for providing the doctor's note. I have uploaded this to your case. I would like to ask for clarification from the doctor in terms of your anticipated to return to work date following the guideline of "3 weeks". Please advise at your earliest so I can update the new anticipated return to work date on your case."

This miscommunication must be rectified immediately to ensure my rights under FMLA are upheld. All of my healthcare documents were sent to you via email or uploaded to the portal by myself initially, and now also sent to you via certified mail. Please acknowledge receipt of my documents and confirm my extended leave status as previously indicated by email.

Now, if my FMLA is past the 12 week point do I need to fill out any other documentation to keep myself in full compliance with the university's rules and policies? Please kindly let me know so I can continue complying with the rules and policies of the university, thanks.

Kind regards,
Harout Gulessarian

Consequently, I sent all relevant healthcare documentation via certified mail to 10833 Le Conte Ave, Box 951763, UCLA Department of Neurobiology, 73-235 CHS, specifically addressed to you.

This mail was received by UCLA on July 30, 2024, as confirmed by the certified receipt stamped and received by UCLA. The documents included all of my healthcare/HIPPA protected documents.

9464 E752 M72 2714 2679 4

U.S. Postal Service® CERTIFIED MAIL® RECEIPT	
Delivery Date _____	
Customer Name (or Business) Telephone No. 44-25	1-1-2012 100-12
Customer Address 44-25 Telephone No. 44-25 Name _____ Signature _____ Date 01-01 Postage _____	1-1-2012 100-12
Address to which Mail was sent: 900 2nd St. Ste. 2000, San Jose, CA 95113 Telephone No. 408-277-1234	
Customer Name Telephone No. 44-25 Signature _____ Date 01-01 Total \$1.00	\$1.00
Amount Paid: \$1.00	\$1.00
Customer Name Signature _____ Address & Telephone No. 44-25 Telephone No. 44-25 Signature _____ Date 01-01 Amount Paid \$1.00 Amount Received \$1.00 Signature _____ Date 01-01	\$1.00





Now, to resolve any further concerns and ensure compliance, I have also resent the same documents to the same address via certified mail. And, because you never granted me access to the employee experience portal to upload these documents, I am also providing for your immediate reference an attached copy below of the updated Doctor's Note.



July 10th, 2024

To Whom It May Concern,

Mr Harout Gulessarian is our patient, and has been under our care at EB Psychotherapy since April 2023. Mr Gulessarian is presently actively engaged in treatment to deal with his mental health symptoms. Due to the nature and intensity of his symptoms and the continued functional impairment imposed on him by his mental health diagnosis, Mr Gulessarian has been unable to attend his usual work schedule for a period of 8 weeks, specifically until August 1st, we are now continuing his treatment on his treatment with the goal of restoring his overall mental health.

For anything further, please contact us at info@ebpsychotherapy.com or at 424-268-1777.

Sincerely,

Dr. Kiana Bagourian (PhD)
Clinical Psychologist,
Psychotherapist

EB Psychotherapy
Clinical Director

Please confirm receipt of these documents and update the status of my FMLA leave accordingly. Prompt resolution of this matter is essential to avoid any further discrepancies.

Thank you for your immediate attention to this issue.

Best regards, Harout Gulesserian

On Aug 2, 2024, at 12:29, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

This is a gentle reminder that I have not received an updated Doctor's Note indicating your Return-to-Work date since 7/15/24. Your FMLA leave is currently unapproved. Based on the tentative Doctor's Note I have noting "3 weeks" based on 7/15/24, which lines up to Monday, August 5, 2024. Please remember you need a Return-to-Work Doctor's Note clearance to return to work. If you are extending your leave of absence, please have a detailed Doctor's Note with a set future date (specific date) as well as an updated Doctor's note to cover your unapproved leave onwards from 07/15/24.

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 <image001.png>

Healthcare documentation was delivered to UCLA on the 24th of July via Certified mail due to the inconsistencies within the Neurobiology Department and the constant misrepresentation of facts.

 Nguyen, Helen A.
Leave of Absence Return to Work Notice Reminder
To: Harout Gulessserian

August 2, 2024 at 12:29 PM

Siri found new contact info: Helen A. Nguyen helenanguyen@mednet.ucla.edu [add...](#) 

Hi Harout,

This is a gentle reminder that I have not received an updated Doctor's Note indicating your Return-to-Work date since 7/15/24. Your FMLA leave is currently unapproved. Base on the tentative Doctor's Note I have noting "3 weeks" based on 7/15/24, which lines up to Monday, August 5, 2024. Please remember you need a Return-to-Work Doctor's Note clearance to return to work. If you are extending your leave of absence, please have a detailed Doctor's Note with a set future date (specific date) as well as an updated Doctor's note to cover your unapproved leave onwards from 07/15/24.

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



HR Rep Helen the day before my return around 11:46am asks me to get another document in order to be able to return to work. Basically not giving me enough time to acquire the document from the healthcare provider, knowing I need to return to work on the 6th. The document was acquired on the 8th of August. The delay is now being used against me because HR rep Helen Nguyen did not give me enough time to acquire the document.

Found in inbox - iCloud Mailbox

HN Nguyen, Helen A. RE: Leave of Absence Return to Work Notice Reminder To: Harout Gulessserian

Siri found new contact info: Helen A. Nguyen HelenANguyen@mednet.ucla.edu

Hi Harout,

I have received your updated Doctor's note with a clear specific anticipated to return to work as of 8/6/24. I have updated the information in both your LOA case as well as UC Path. As a reminder, in order to return to work, you will need to complete the "Return to Work" certification document as well as providing a doctor's note clearing you to return to work. I have attached the Return-to-Work certification document for you. Once I have received and reviewed your documentations, I will be able to process your return to work in a timely manner.

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

UCLA Health

From: Harout Gulessserian <hkg90@icloud.com>
Sent: Saturday, August 3, 2024 5:00 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: Leave of Absence Return to Work Notice Reminder

The continuous inconsistencies with Mark Lucas. Mixing up dates then using it against me later stating that I was to return on the 12th of august not the 13th?

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

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

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

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

Best,
Mark Lucas
Chief Administrative Officer
Department of Neurobiology

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



Harout Gulessserian

Re: Leave of Absence Return to Work Notice Reminder

To: Nguyen, Helen A., Bcc: LOA Team, chr@chr.ucla.edu, UCLAHealth-HR@mednet.ucla.edu

August 5, 2024 at 8:56 PM

[Details](#)

[Email icons]

11+

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 5th, 2024.

To Whom It May Concern,

Mr Harout Gulessserian is our patient, and has been under our care at EB PSYCHOTHERAPY since 4/24/2024. I am writing to inform you that Mr Gulessserian has made significant progress and is now ready

HG**Harout Guesserian**

Re: Leave of Absence Return to Work Notice Reminder

To: Nguyen, Helen A., Cc: UCLAHealth-HR@mednet.ucla.edu, Bcc: LOA Team & 2 more

August 9, 2024 at 11:04 AM

[Details](#)

Hi Helen,

Thank you for the update. I have obtained the required certification from my healthcare provider (see attached below). I appreciate your assistance in processing the paid leave for this week, and noting the details in my LOA case that the Neurobiology departments CAD extended my leave due to a lack of assignments being available to me in the lab, not from my end.

Additionally, I would like to mention that both of the supervisors were well aware of my return during the first week of August. So there should be no confusion on that front (See attached #2 & #3 below).

1) Healthcare certification

Enclosure Envelope ID: 303746291-B72B-412B-B9CF-11D19E888832

**RETURN TO WORK CERTIFICATION
For Family and Medical Leave (FML)**

SECTION I – To be completed by THE EMPLOYER

EMPLOYEE'S NAME (LAST, FIRST, MIDDLE INITIALS)
Guesserian, Harout K.

EMPLOYEE'S DEPARTMENT
NEUROBIOLOGY

DEPARTMENT CONTACT
Helen Nguyen

DEPARTMENT CONTACT'S EMAIL ADDRESS
10833 Le Conte Ave, Los Angeles, CA 90095

PHONE 424-440-3429 310-825-2224 310-825-2224 Helen.A.Nguyen@mednet.ucla.edu

SECTION II – To be completed by HEALTH CARE PROVIDER

NAME OF HEALTH CARE PROVIDER
Elena Bogomolni, Ph.D.

ADDRESS
12215 Seminole St, Ste 310A, Culver City, CA 90230

PLACE APPROXIMATE STREET NUMBER
Bogomolni

PLEASE COMPLETE THE FOLLOWING AND RETURN THE FORM TO THE EMPLOYEE
OR TO THE DEPARTMENT CONTACT LISTED ABOVE PRIOR TO THE RETURN TO WORK DATE

Important: Please limit your answers below to the serious health condition for which the Employee has been on leave.

THE GENETIC INFORMATION NONDISCRIMINATION ACT OF 2008 (GINA): The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assisted reproductive services.

1. Is the employee now able to perform those essential functions of his or her job that she could not previously perform because of the serious health condition for which the employee has been on leave?

No.
 Yes.
 Yes, with restrictions.

2. Employee released to return to work effective 8/8/2024 (Indicate date)

3. If the Employee is released to work but is restricted in his or her ability to perform the essential functions of his or her job as a result of the serious health condition for which the employee has been on leave, please describe those restrictions:

 Nguyen, Helen A. August 12, 2024 at 1:37 PM
First Day Back - Reminder - ACTION REQUIRED - Harout Gulessarian - HRC0301037
To: Harout Gulessarian, Cc: Novitch, Bennett, Lucas, Mark Details
Siri found new contact info: Helen A. Nguyen HelenANguyen@mednet.ucla.edu add... 

Hi Harout,

According to our records, you are scheduled to return to work from your leave of absence today, 08-12-2024.

Please advise us if you are back at work today by completing the task assigned to you in Employee Experience Center: [HERE](#)

You can also see the task under Employee Experience Center > My To-dos

Your manager, Harout Gulessarian, may also reach out to me to confirm.

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on [myUCLAHealth](#) by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with [UCLA Occupational Health Services](#) by calling 310-825-6771. You can also book an appointment using your [myUCLAHealth](#) portal.

For information on requesting an exemption, please visit <https://www.uclahealth.org/hr/covidvacexception>

If you have any questions about this, please call me at (310) 794-0301 or email me at HelenANguyen@mednet.ucla.edu

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

HG Harout Gulessserian August 12, 2024 at 4:22 PM
Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessserian - HRC0301037
To: Nguyen, Helen A., Cc: Health Employee UCLA, UCLAHealth-HR@mednet.ucla.edu, LOA Team [Details](#)

Siri found new contact info Helen A. Nguyen HelenANguyen@mednet.ucla.edu

[add...](#)

Dear Helen,

Cc'd in this email: UCLA Health Employee Relations, UCLA LOAteam, and UCLA-Health HR.

I hope this email finds you well. I am writing to address my return to work date issue, as outlined in the email I received from Mark Lucas on [08/05/2024 5:33pm].

Per my original physician's note, my return date was set for **August 6, 2024** (You have this document in your possession so does Mark Lucas). However, Mark Lucas communicated to me that, due to Professor Novitch's absence, my return date would be extended to **August 13, 2024** (See attached below). Following this clear instruction from Mark Lucas, I prepared to return on **August 13th** as directed even though I was ready to return on the **August 6th** originally.

It has now come to my attention that there is a claim that the expected return date was actually intended to be **August 12th**. There is no way I could have known that '**August 13th**' actually meant **August 12th**. I followed the instructions provided in Mark Lucas's email in good faith, and it is unreasonable to expect me to have somehow interpreted the date differently.

I would appreciate it if this matter could be resolved promptly and with the understanding that I adhered to the instructions given to me by Mark Lucas.

Best regards,
Harout Gulessserian

Attached: Email from Mark Lucas to Harout Gulessserian on 8/5/2024

17:40



Messages

Inbox



Mark Lucas

17:33

 HG**Harout Gulessserian**

Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessserian - HRC0301037
To: Nguyen, Helen A.; Cc: UCLA Health Employee Relations, LOA Team

August 13, 2024 at 4:20 PM

[Details](#)

Hi Helen,

I wanted to update you on my situation today. I spent the day sitting in the lobby of CHS and the biomedical library at CHS because I was instructed not to go up to the lab unless I had an assignment in a previous correspondence. I reached out to Ben earlier for direction, and he responded around 2:30 PM, informing me of his absence from the lab, but was willing to meet with me over zoom sometime in the next day to discuss my return, schedule, plans, and expectations.

Ben also mentioned that both you, and Mark were aware of his situation. However, this information was never communicated to me, so I've been here on the first floor of CHS all day waiting for a response.

I also wanted to note that I reported back to work today, but was unable to update the Employee Experience Center task because my login was, and continues to be locked. Furthermore, can you kindly fill out my timesheet as well? hopefully reflecting the hours of last week, yesterday, and today.

Thank you for your all of your time and assistance; they are deeply appreciated!

Best regards,
Harout Gulessserian

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

 HN**Nguyen, Helen A.**

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

August 14, 2024 at 8:30 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



From: Harout Gulessserian <hkg90@icloud.com>
Sent: Tuesday, August 13, 2024 4:20 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Cc: UCLA Health Employee Relations <UCLAHealthEmployeeRelations@mednet.ucla.edu>; LOA Team <LOATeam@mednet.ucla.edu>
Subject: Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessserian - HRC0301037

[See More from Harout Gulessserian](#)

 HG

Harout Gulessserian

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

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

HG

Harout Gulessarian

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

[See More from Harout Gulessarian](#)



Harout Gulessserian
Harout Gulessserian
To: Vera Moubayed

Sent - iCloud August 15, 2024 at 2:12 PM



Dear Vera,

I wanted to reach out to you directly as I believe your role as the Employee Relations Manager could be instrumental in addressing the ongoing issues within the department. I've BCC'd you on a previous email I sent to Helen outlining some of these concerns.

To provide some context, I was placed on Administrative Leave without receiving any notice. My return from FMLA was scheduled for August 6, but the department extended this leave, initially calling it an FMLA extension. However, just yesterday, I was informed that this is actually an Administrative Leave, again without any formal notice or explanation. This lack of communication and clarity is deeply concerning and seems to violate standard procedures.

I reserve all objections, all rights, make no waivers or admissions.

There have also been additional issues related to the denial of flexible hours, which was a necessary accommodation for my healthcare needs, as well as incidents of hostility and a lack of transparency within the department.

I believe these matters are serious and require immediate attention to ensure a compliant and respectful work environment. I would greatly appreciate your involvement in resolving these issues.

Thank you for your time and understanding.

Best regards,
Harout Gulessserian

07:38

5G

< Sent

Return to Work



schedule will now be respected as you indicated.

2 Remote Work:

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

3 Research Focus:

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

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

This is precisely why we sign the patent acknowledgment agreement. Nowhere in that



07:38

5G ✓

< Sent

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Harout Gulessarian

To: Helen Bcc: Vera >

8/19/24



Re: Return to Work

Dear Helen,

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

1 Working hours Schedule:

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

2 Remote Work:

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

3 Research Focus:

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



07:38

5G ✓

< Sent

Return to Work



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

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

I trust that these clarifications can be addressed promptly.

Sincerely,
Harout Gulesserian

On Aug 16, 2024, at 08:25, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

August 16, 2024

Harout Gulesserian

Dear Harout,

This letter is to memorialize our conversation this morning regarding your return to work in the lab of Ben Novitch in the Department of Neurobiology. As discussed, you will be returning to onsite work on Monday, August 19, 2024. This will be transition in Dr. Novitch's office in autumn 1st floor.



07:39

5G ✓

Inbox

3 Messages



Helen A. Nguyen

To: Harout Cc: Bennett >

8/16/24



Return to Work

August 15, 2024

Harout Gulessarian

Dear Harout,

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

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

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

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

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

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

Best wishes,

Ben Novitch, Ph.D.

Helen A. Nguyen, MBA



HG

From: Subject: Date: To: Cc:

Harout Gulessrian HKG90@icloud.com
Re: Harout Gulessrian Workplace Accommodations
August 21, 2024 at 9:16 PM
Frohrrip, Shelly sfrohrrip@irm.ucla.edu
Eli Hamblet ehamblet@jafarilawgroup.com, Saul Acherman sacherman@jafarilawgroup.com, Law Clerk 1 lawclerk-1@jafarilawgroup.com

Good evening,

Thank you for reaching out. I am sorry for my delayed response as things have been tough, and I'm not doing too well.

I am writing to seek your assistance with an ongoing situation in my department. I am currently facing retaliation for following policy, reporting policy violations, and addressing a hostile work environment related to my request for doctor-recommended reasonable accommodations. Despite informing Department HR of these issues, they have not responded to my concerns.

Upon returning from FMLA leave on August 6th, I was placed on administrative leave without prior notice. Additionally, I have experienced intimidation and hostility from the department, with more emphasis being placed on understanding my diagnosis rather than addressing my reasonable accommodations. My diagnosis has been shared and discussed within the department, which I believe is unnecessary and inappropriate when my concern is obtaining the accommodations I need.

Here is a quick overview of some of the major events that have occurred to me without limitations:

- 9/11/23: I Made a novel discovery and created a protocol in the Novitch Lab at UCLA

. 9/29/2023 Informed supervisor of my discovery

- 9/29 - present: Numerous attempts by lab members to make me waive my inventor/creator rights by misleading comments to share with others, attempts to steal my work, and threats some even in writing, also including misleading emails with respect to reporting potentially patentable IP to the university. This has created a hostile work environment for me and there seems to be at minimum attempts of misappropriation of university assets along with violations of various university policies.

1/12/2024 Harout Reported discovery to Vice Chancellor Amir Naiberg and UCLA CIPO at TDG in fear of misappropriation occurring in the lab.

~ 1/31/2024 I tended to about 3-4 visits with UCLA confidential counseling regarding the ongoing situation in the lab, and how my well being was declining due to the hostile work environment.

- Then on 2/6/24: I Received a message regarding the theft of IP I created in the Novitch lab from Ben's grad student. This message was delivered to me via the platform UCLA Slack.

- 2/23/24: Got yelled at by Ben for reporting a potentially patentable creation to UCLA TDG along with Ben cursing at me/grinding his teeth at me with fuming anger. During this meeting I also Reported the IP theft message to Ben, and asked for him to follow UCLA best practices/ policy with respect to IP protection and reporting to TDG as required by policy.

- 2/23 - 4/24: Hostile work environment intensified with documented evidence.

4/19 Ben misleads Mark Lucas about my whereabouts even though I had reached out to Ben and told him

4/19 Ben misleads Mark Lucas about my whereabouts even though I had reached out to Ben and told him I'm tending to healthcare related matters. Mark then claims that Ben mislead him while emailing Harout about his possible healthcare options.

- 4/24/24: Yelled at by Ben and Samantha Butler for reporting potential misappropriation concerns to the university. This event took place on the first floor of CHS around 4:15pm in front of public bystanders. "Why are you even here?", "You will be fired", "you are a liar" Samantha told Harout opening her eyes wide causing Harout to have a panic attack (Samantha Butler is Bennett Novitch's wife who is also a PI in the same department as Ben but not Harout's supervisor.) Then Ben ended their hostility towards me with "go home". I reported this event to Department CAO Mark Lucas twice, and HR rep Helen once. No reports were made.

- 4/24/24: Harout informs Mark Lucas (Neurobiology Department CAO) about the need to be on FMLA after the incident with Ben and Samantha. Although Mark Lucas claimed to be the FMLA initiator Mark did not initiate Harout's request for FMLA leave for mental health. Furthermore, Mark Lucas provided Harout with a false email to HR to report the incident. Harout reported the hostile event that occurred on the first floor of CHS in public view to Mark twice (Mark is a departmental CAO in neurobiology). Mark disregards the reports and begins to retaliate against Harout.

- 4/30/24: I Harout had to file my own FMLA per the guidance of campus HR due to Mark providing incorrect information to Harout. Had campus HR not initiated FMLA I was likely going to be fired for not showing up to work because Mark had claimed my FMLA was unapproved and my absence was unexcused in writing multiple times, Mark was more concerned about my healthcare plans as he asked me what are my plans when I had told him clearly I needed to be on FMLA (all while Mark stated clearly he is the FMLA initiator yet did not initiate the FMLA).

- 5/7/24: Exactly 14 days after pleading to Mark Lucas to initiate FMLA on 4/24/24 for Harout, the Department of Neurobiology randomly opened a second FMLA ticket under my name and proceeded to use healthcare documentation uploading dates against me, alleging I hadn't uploaded healthcare documents. All while I had proof of uploading documents sent to various HR departments at the university including without limitations; LOA team, employee relations, campus HR etc. all with picture proof of every upload.

- 5/15/24: Mark Lucas made false statements about healthcare documentation not being uploaded. Then all of a sudden, my privilege of uploading healthcare documents was taken away. I made numerous complaints to HR rep Helen that I did not have access to upload documents anymore to which I had to start sending certified mail to ensure compliance with the university rules because Helen never addressed this issue.

6/2024 Then, Helen from Neurobiology HR starts to ask me Harout to prematurely fill out return to work documents 6 weeks in advance from FMLA even though the doctors recommendation was to return on 07/15/2024 to which was later extended to 08/06/2024. Furthermore Helen insisted that I fill out the designation document that was already filled out by Helen herself on numerous occasions.

- 8/6/24: I was supposed to return from FMLA, Mark Lucas extended my FMLA leave to August 13th. Then on 8/14/2024 the department HR told me randomly it's an administrative leave from 8/6-8/19 with no explanation as to why I'm being put on administrative leave.
- 8/19/24: I was to meet with Ben and HR rep Helen. HR rep Helen did not show up even though she had confirmed she would be present at the meeting. During this meeting Ben got angry again and told me to go Home, though he was a bit calmer afterwards. I returned to work but was restricted from working on go Home, though he was a bit calmer afterwards. I returned to work but was restricted from working on what I invented/discovered in the lab.

I would greatly appreciate your advice on how to proceed. Additionally, I would like to request an in-person meeting with you to discuss these matters confidentially with all documentary evidence ready. My supervisor has insisted on attending any meetings with me, but I believe it is crucial to have this conversation privately with you and another HR supervisor from the Wilshire main office if possible, please. This meeting would be held without Bennett Novitch, without Mark Lucas without Samantha Butler and without Helen Nguyen so I can speak freely and be heard.

Thank you for your time and assistance. I look forward to your response.

Best regards Harout Gulessarian

On Aug 19, 2024, at 16:53, Frohrip, Shelly <sfrohrip@irm.ucla.edu> wrote:

Hi Harout,

Thank you for your email. With your request for a stress-free work environment, I would like to discuss this with you further to understand more about the situations you have noted have occurred and discuss possible accommodations that will help accommodate you in the workplace. Would you have some time between 11:30-2:00 tomorrow for a call?

Thank you, Shelly

Shelly Frohrip

Employee Disability Management Services-Program Manager

Email: sfrohrip@irm.ucla.edu

Phone: 424-259-5242

10920 Wilshire Blvd., suite 620

Los Angeles, CA 90024

<image001.png>

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Monday, August 19, 2024 12:56 PM
To: Frohrip, Shelly <sfrohrip@irm.ucla.edu>
Subject: Harout Gulessarian Workplace Accommodations

Greetings to whom it may concern,

My name is Harout Gulessarian, UID 505876880 an SRA in Neurobiology Novitch lab. Please find below a response to a voicemail left on my phone.

I hope this message finds you well. I am writing to formally request workplace accommodations that will support my ability to perform my job effectively and

accommodations that will support my ability to perform my job effectively and maintain my well-being. Based on recommendations from my healthcare provider, I believe the following accommodations are essential:

1) Stress-Free Work Environment: A stress-free work environment will enable me to focus more effectively on my tasks, maintain a high level of productivity, and contribute positively to the team. By minimizing stressors, such as avoiding situations where I am yelled at by my supervisor or any other UCLA employee, asked to break policy, or subjected to inappropriate comments or actions related to intellectual property (IP) theft, I will be able to manage my workload more efficiently, make clear and thoughtful decisions, and engage more fully in collaborative efforts. This adjustment will help me maintain consistent performance and ensure that I can continue to meet the expectations of my role without compromising my well-being.

1. 2) Flexible Working Hours: My healthcare provider has also requested flexible working hours to help minimize interactions with individuals who have caused significant stress in the workplace to me. Adjusting my schedule to (7:00am-3:30pm) will likely minimize these interactions, which would allow me to focus on my assigned tasks effectively.

Thank you for your attention to this matter. I am confident that these accommodations will enable me to continue contributing effectively to the university. Please let me know the next steps in the process, and if any additional information is needed.

Kind regards, Harout Gulessarian

 **Frohrip, Shelly**
RE: Harout Gulessarian Workplace Accommodations
To: Harout Gulessarian, Cc: Eli Hamblet, Saul Acherman, Law Clerk 1 August 23, 2024 at 11:25 AM

[Details](#)



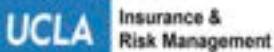
Hi Harout,

Thank you for your email. I'm sorry to hear of your situation within your department. The Employee Disability Management Services office does not conduct investigations. I am referring you to the UCLA Discrimination Prevention Office: <https://adminvc.ucla.edu/equity/reporting/DPO>. 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 [DPO Complaint Form](#) via the electronic form.

I can meet with you in person at the Wilshire Center to continue discussion of your accommodation requests and next steps. I have received your return-to-work certification form indicating you can return to work as of 8/8/24 with the following restrictions: flexible work hours, stress free environment for 2 months. It is my understanding you and your supervisor have agreed on a work schedule of 7:00 a.m.-3:30 p.m. to accommodate you. With your request for a stress-free work environment, I would like to discuss this with you further to understand more and discuss possible accommodations that will help accommodate you in the workplace. Would Tuesday, 8/27 work for you to meet at Wilshire Center or if you would like to discuss this via Zoom I can provide additional availability.

Thank you,
Shelly

Shelly Frohrip
Employee Disability Management Services-Program Manager
Email: sfrohri@rm.ucla.edu
Phone: 424-259-5242
10920 Wilshire Blvd., suite 620
Los Angeles, CA 90024



[See More from Harout Gulessarian](#)

UCLA TDG

From: Harout Gulessarian HKG90@icloud.com
Subject: Patenting rights
Date: January 12, 2024 at 1:50 PM
To: amir.naiberg@research.ucla.edu

HG

Hi Amir,

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 . 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

From: Naiberg, Amir amir.naiberg@tdg.ucla.edu
Subject: RE: Patenting rights
Date: January 12, 2024 at 10:27 PM
To: Harout Gulesserian hkg90@icloud.com

AN

Harout,

You can find instructions on disclosing the invention in this link: <https://tdg.ucla.edu/ucla-researchers-innovators/submit-invention#:~:text=The%20ideal%20time%20to%20disclose,patenting%20and%20commercial%20partnering%20strategy>.

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) 794-0015
Email amir.naiberg@tdg.ucla.edu

tdg.ucla.edu
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-----Original Message-----

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Friday, January 12, 2024 11:51 PM
To: Naiberg, Amir <amir.naiberg@tdg.ucla.edu>
Subject: Patenting rights

Hi Amir,

My name is Harout Gulesserian. 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 hgulesserian@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

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: Patenting rights
Date: January 14, 2024 at 6:57 PM
To: Naiberg, Amir amir.naiberg@tdg.ucla.edu

HG

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

On Jan 12, 2024, at 10:27 PM, "Naiberg, Amir" <amir.naiberg@tdg.ucla.edu> wrote:

Harout,

You can find instructions on disclosing the invention in this link: <https://tdg.ucla.edu/ucla-researchers-innovators/submit-invention#:~:text=The%20ideal%20time%20to%20disclose,patenting%20and%20commercial%20partnering%20strategy>.

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) 794-0015
Email amir.naiberg@tdg.ucla.edu

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-----Original Message-----

From: Harout Gulessserian <hka90@icloud.com>

From: Naiberg, Amir amir.naiberg@tdg.ucla.edu 
Subject: RE: Patenting rights
Date: January 16, 2024 at 10:30 AM
To: Harout Gulessarian hkg90@icloud.com, Arora, Charanjit charanjit.arora@tdg.ucla.edu

AN

Charan, see below. Your guidance is appreciated.

Thank you,

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



tdg.ucla.edu

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From: Harout Gulessarian <hkg90@icloud.com>
Sent: Sunday, January 14, 2024 6:58 PM
To: Naiberg, Amir <amir.naiberg@tdg.ucla.edu>
Subject: Re: Patenting rights

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

From: Harout Gulessarian HKG90@icloud.com 
Subject: Re: Patenting rights
Date: January 19, 2024 at 12:35 AM
To: charanjit.arora@tdg.ucla.edu

HG

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 ao

#3 Cryo mold organoid aligning tray

Sincerely,

Harout

On Jan 16, 2024, at 10:30 AM, "Naiberg, Amir" <amir.naiberg@tdg.ucla.edu> wrote:

Charan, see below. Your guidance is appreciated.

Thank you,

Amir Naiberg

Associate Vice Chancellor, CEO & President

UCLA Technology Development Group

10889 Wilshire Blvd. Suite 920
Los Angeles, CA 90095

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Patenting rights
Date: January 21, 2024 at 7:03 PM
To: charanjit.arora@tdg.ucla.edu

HG

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

On Jan 19, 2024, at 12:35 AM, Harout Gulessarian <hkg90@icloud.com> wrote:

Good evening, Charan,

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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.

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#2 Usage of BRAF inhibitor SB590885 during ao
#3 Cryo mold organoid aligning tray

Sincerely,

Harout

From: Arora, Charanjit charanjit.arora@tdg.ucla.edu 
Subject: RE: Patenting rights
Date: January 22, 2024 at 10:55 AM
To: Harout Gulesserian hkg90@icloud.com

CA

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, 1-1:30pm, 2-4pm
Jan 24 12-2pm, 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 920
Los Angeles CA 90095-7191
Phone: (310) 794-0220
Email: charanjit.arora@tdg.ucla.edu
(Pronouns: He/Him)



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From: Harout Gulesserian <hkg90@icloud.com>
Sent: Sunday, January 21, 2024 7:03 PM
To: Arora, Charanjit <charanjit.arora@tdg.ucla.edu>
Subject: Re: Patenting rights

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: IP rights
Date: January 22, 2024 at 3:48 PM
To: Arora, Charanjit charanjit.arora@tdg.ucla.edu

HG

Good afternoon Charan,

Thank you for your prompt response. Let me thank you in advance for all of your time and assistance. It is deeply appreciated.

I'm available for the January 24th 2-3pm slot. Please confirm if that timeframe remains available.

I look forward to your guidance and assistance.

Harout

On Jan 22, 2024, at 10:55 AM, Arora, Charanjit <charanjit.arora@tdg.ucla.edu> wrote:

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UCLA Technology Development Group
10889 Wilshire Blvd. Suite 920
Los Angeles CA 90095-7191
Phone: (310) 794-0220
Email: charanjit.arora@tdg.ucla.edu
(Pronouns: He/Him)

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[<image005.png>](#)

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From: Arora, Charanjit charanjit.arora@tdg.ucla.edu
Subject: RE: IP rights
Date: January 23, 2024 at 12:26 PM
To: Harout Gulessarian hkg90@icloud.com

CA

Thanks Harout. I shared an invite for a call at 2:30pm tomorrow. I look forward to speaking with you then.

Best,
Charan

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Monday, January 22, 2024 3:48 PM
To: Arora, Charanjit <charanjit.arora@tdg.ucla.edu>
Subject: Re: IP rights

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Best regards,
Charan

Charan Arora, J.D., Ph.D.
Chief Intellectual Property Officer
UCLA Technology Development Group
10889 Wilshire Blvd Suite 920

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: IP rights
Date: January 23, 2024 at 4:08 PM
To: Arora, Charanjit charanjit.arora@tdg.ucla.edu

HG

Hello Charan,

Thanks for the link. I am looking forward to our talk as well.

See you then.

Harout

On Jan 23, 2024, at 12:26 PM, Arora, Charanjit <charanjit.arora@tdg.ucla.edu> wrote:

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Best,
Charan

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Sent: Monday, January 22, 2024 3:48 PM
To: Arora, Charanjit <charanjit.arora@tdg.ucla.edu>
Subject: Re: IP rights

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Jan 24 12-2pm, 2-3pm

...

From: Arora, Charanjit charanjit.arora@tdg.ucla.edu 
Subject: RE: Patenting rights
Date: January 24, 2024 at 3:10 PM
To: Harout Gulesserian hkg90@icloud.com
Cc: TDG Innovation innovation@tdg.ucla.edu

CA

Hi Harout,
Thank you for the call.

As next step, we await a full disclosure of the protocol and device via an invention disclosure form that is attached to this email.

Please note that discussing the protocol outside of the lab may hinder IP protection and commercialization of your idea. Discussing internally with your PI or lab members is considered confidential for IP purposes.

Please let me know immediately if you plan to share the protocol with outside parties (including outside of the lab but within UCLA) so that my office can take appropriate steps to protect the IP.

Best regards,
Charan

Charan Arora, J.D., Ph.D.
Chief Intellectual Property Officer
UCLA Technology Development Group
10889 Wilshire Blvd. Suite 920
Los Angeles CA 90095-7191
Phone: (310) 794-0220
Email: charanjit.arora@tdg.ucla.edu
(Pronouns: He/Him)



Technology
Development Group

tdg.ucla.edu

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

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Patenting rights
Date: January 24, 2024 at 10:14 PM
To: Charanjit Arora charanjit.arora@tdg.ucla.edu

HG

Hello Charan,

It was a great pleasure to meet you, and thank you for taking the time out of your schedule to discuss the IP I created.

Per your recommendation, I will be filling out the invention disclosure forms to disclose the full quantum of the invention(s) in addition to what I already provided.

Also, I wanted to thank you for clarifying the regulations of disclosing my protocol to others; whether it be a lab member, PI, or an external source from UCLA. Much appreciated!

Given that this protocol will likely be used across several labs at UCLA, and other institutions involved in the consortium. I believe it is safe to say that my protocol will be disclosed to other labs, and your team will likely need to further protect the IP.

Thanks again,
Harout

On Jan 24, 2024, at 4:24 PM, Harout Gulessarian <hkg90@icloud.com> wrote:

Keep for records.

Harout

Begin forwarded message:

From: "Arora, Charanji" <charanjit.arora@tdg.ucla.edu>
Date: January 24, 2024 at 3:10:49 PM PST
To: Harout Gulessarian <hkg90@icloud.com>
Cc: TDG Innovation <innovation@tdg.ucla.edu>
Subject: RE: Patenting rights

Hi Harout,
Thank you for the call.

As next step, we await a full disclosure of the protocol and device via an invention disclosure form that is attached to this email.

Please note that discussing the protocol outside of the lab may hinder IP protection and commercialization of your idea. Discussing internally with your PI or lab members is considered confidential for IP purposes.

Please let me know immediately if you plan to share the protocol with outside parties (including outside of the lab but within UCLA) so that my office can take appropriate steps to protect the IP.

Best regards,
Charan

Charan Arora, J.D., Ph.D.
Chief Intellectual Property Officer
UCLA Technology Development Group
10889 Wilshire Blvd. Suite 920
Los Angeles CA 90095-7191
Phone: (310) 794-0220
Email: charanjit.arora@tdg.ucla.edu

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Patenting rights
Date: January 30, 2024 at 9:19 AM
To: Arora, Charanjit charanjit.arora@tdg.ucla.edu

HG

Good morning Charan,

Hope all is going well on your end!

I just wanted to keep you in the loop as to where we stand with the disclosure form.

I updated the protocol and most of the results I have thus far to a document attached below. I will be disclosing all of this information to my lab for the first time today, and am hopeful that in the near future my PI and I will submit the disclosure form formally once all the writing and information needed are out of the way.

I just wanted to thank you again for all the guidance and help you have provided, I really appreciate it!

Harout



ACOP_manuscri
pt_1.pdf
Downloading...

On Jan 24, 2024, at 3:10 PM, "Arora, Charanjit" <charanjit.arora@tdg.ucla.edu> wrote:

Hi Harout,

Thank you for the call.

As next step, we await a full disclosure of the protocol and device via an invention disclosure form that is attached to this email.

Please note that discussing the protocol outside of the lab may hinder IP protection and commercialization of your idea. Discussing internally with your PI or lab members is considered confidential for IP purposes.

Please let me know immediately if you plan to share the protocol with outside parties (including outside of the lab but within UCLA) so that my office can take appropriate steps to protect the IP.

Best regards,

Charan

Charan Arora, J.D., Ph.D.

Chief Intellectual Property Officer

UCLA Technology Development Group

10889 Wilshire Blvd. Suite 920

Los Angeles CA 90095-7191

Phone: (310) 794-0220

Email: charanjit.arora@tdg.ucla.edu

(Pronouns: He/Him)

From: Arora, Charanjit charanjit.arora@tdg.ucla.edu
Subject: RE: Patenting rights
Date: January 30, 2024 at 10:36 AM
To: Harout Gulessarian hkg90@icloud.com

CA

Thank you for the update, Harout. Hope the group discussion goes well.

Best,
Charan

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, January 30, 2024 9:19 AM
To: Arora, Charanjit <charanjit.arora@tdg.ucla.edu>
Subject: Re: Patenting rights

Good morning Charan,

Attachment available until February 29, 2024.

Hope all is going well on your end!

I just wanted to keep you in the loop as to where we stand with the disclosure form.

I updated the protocol and most of the results I have thus far to a document attached below. I will be disclosing all of this information to my lab for the first time today, and am hopeful that in the near future my PI and I will submit the disclosure form formally once all the writing and information needed are out of the way.

I just wanted to thank you again for all the guidance and help you have provided, I really appreciate it!

Harout

[Download from iCloud](#)

ACOP_manuscript_1.pdf
43.6 MB

On Jan 24, 2024, at 3:10 PM, "Arora, Charanjit" <charanjit.arora@tdg.ucla.edu> wrote:

Hi Harout,
Thank you for the call.

As next step, we await a full disclosure of the protocol and device via an invention disclosure form that is attached to this email.

Please note that discussing the protocol outside of the lab may hinder IP protection and commercialization of your idea. Discussing internally with your PI or lab members is considered confidential for IP purposes.

Please let me know immediately if you plan to share the protocol with outside

From: Harout Gulessarian HKG90@icloud.com 
Subject: Re: Patenting rights
Date: February 16, 2024 at 10:57 AM
To: Arora, Charanjit charanjit.arora@tdg.ucla.edu

HG

Dear Charan,

Attached below, and incorporated by reference, you will find a draft manuscript of my original Intellectual Property discoveries, inventions, and creations (which I submitted to your office on 1/23/2024 along with a follow up PDF on 1/30/2024).

Presently, I essentially added the value of invention sections and other requested information regarding my accidental discovery of the breakthrough novel cerebral organoid protocol as the entire submission is now particularly underscored more fully in both form and substance from my previous submissions to TDG. I await further guidance and review as to both form and substance along with your/TDG's guidance as to the next steps necessary so as to further the IP drafting and prosecution process. Regarding the assignment of a BDO, does that happen with you directly?

Lastly, please take notice that there is much interest from both UCLA labs and non-UCLA labs for me to disclose the confidential breakthroughs/creations (attached below) despite the fact that the IP petitions remain not filed with the governmental authorities just yet.

As an aside, and in the interest of expediting disclosure of my novel creations/breakthroughs, the next issue is whether TDG provides any written materials so as I may circulate to the other UCLA and non-UCLA lab members (from a layperson perspective: a hypothetical example of something akin to UCLA Non-Disclosure agreement, or any other legal documents that allow for both the UCLA IP interest and my discovery/creation rights to be legally preserved, protected, and prosecuted yet, at the same time to be shared and disclosed for further academic and/or commercial use to respective UCLA labs and other respective non-UCLA labs).

Thank you in advance for your time and assistance; they are deeply appreciated and I await your future instructions and guidance on the matters.

Kind regards,
Harout

On Jan 30, 2024, at 10:36 AM, "Arora, Charanxit" <charanjit.arora@tdg.ucla.edu> wrote:

Thank you for the update, Harout. Hope the group discussion goes well.

Best,
Charan

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, January 30, 2024 9:19 AM
To: Arora, Charanxit <charanjit.arora@tdg.ucla.edu>
Subject: Re: Patenting rights

Good morning Charan,

Attachment available until February 29, 2024.

Hope all is going well on your end!

I just wanted to keep you in the loop as to where we stand with the disclosure form.

I updated the protocol and most of the results I have thus far to a document attached below. I will be disclosing all of this information to my lab for the first time today, and am hopeful that in the near future my PI and I will submit the disclosure form formally once all

From: Arora, Charanjit charanjit.arora@tdg.ucla.edu 
Subject: FW: Patenting rights
Date: February 20, 2024 at 10:01 AM
To: Harout Gulesserian hkg90@icloud.com
Cc: TDG Innovation innovation@tdg.ucla.edu

CA

Hi Harout,

Thank you for sharing the draft manuscript, this is very helpful! Can you please update me on the submission of an updated invention disclosure? You may recall that the wrong documents were used for the initial disclosure to on Jan 19.

Please fill out the document that is embedded in the attached email. We will then process the document and will reach out to discuss next steps.

Best,
Charan

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Friday, February 16, 2024 10:58 AM
To: Arora, Charanjit <charanjit.arora@tdg.ucla.edu>
Subject: Re: Patenting rights

Dear Charan,

Attached below, and incorporated by reference, you will find a draft manuscript of my original Intellectual Property discoveries, inventions, and creations (which I submitted to your office on 1/23/2024 along with a follow up PDF on 1/30/2024).

Presently, I essentially added the value of invention sections and other requested information regarding my accidental discovery of the breakthrough novel cerebral organoid protocol as the entire submission is now particularly underscored more fully in both form and substance from my previous submissions to TDG. I await further guidance and review as to both form and substance along with your/TDG's guidance as to the next steps necessary so as to further the IP drafting and prosecution process. Regarding the assignment of a BDO, does that happen with you directly?

Lastly, please take notice that there is much interest from both UCLA labs and non-UCLA labs for me to disclose the confidential breakthroughs/creations (attached below) despite the fact that the IP petitions remain not filed with the governmental authorities just yet.

As an aside, and in the interest of expediting disclosure of my novel creations/breakthroughs, the next issue is whether TDG provides any written materials so as I may circulate to the other UCLA and non-UCLA lab members (from a layperson perspective: a hypothetical example of something akin to UCLA Non-Disclosure agreement, or any other legal documents that allow for both the UCLA IP interest and my discovery/creation rights to be legally preserved, protected, and prosecuted yet, at the same time to be shared and disclosed for further academic and/or commercial use to respective UCLA labs and other respective non-UCLA labs).

Thank you in advance for your time and assistance; they are deeply appreciated and I await your future instructions and guidance on the matters.

From: Harout Gulessarian HKG90@icloud.com 
Subject: Re: Patenting rights
Date: February 27, 2024 at 4:56 PM
To: Arora, Charanjit charanjit.arora@tdg.ucla.edu

HG

Dear Charan,

Per your request, attached below is essentially all the same substantive information found in the earlier draft. Procedurally, I noticed sections 2 –4 of this form request very specific and detailed information such as all funding sources, grants, etc.

Furthermore, I added the PI of the lab where I work under the "inventor" section; this is essentially because of his role as Principal Investigator and grant and funding ascertainer. That being said, as a Principal Investigator I believe Dr. Novitch is best suited for directly identifying any and all sources of grants, funds, etc. as noted more fully in the sections above. Basically, I am neither in possession of, nor am I the usual custodian for this information, otherwise I would have added that to the form, as well.

Because of this, I notified Dr. Novitch that TDG will require funding information and the like because the invention disclosure form requires this. Also, I noted to Dr. Novitch that TDG will likely reach out to Dr. Novitch to likely: #1) ascertain and #2) verify all funding sources, and any other relevant information that is customary for Principal Investigators to provide to TDG during this kind of IP drafting and prosecuting process by UCLA.

That being said, I could be wrong, but it seemed to me as if the PI himself was not thrilled that I reached out to Vice chancellor Naiberg, and how I was guided to your office. It was apparent that my discovery was going to be disclosed with other labs especially across UCLA i.e., the consortium group as we had previously discussed, despite the fact that Vice chancellor Naiberg essentially indicated that going through your office and TDG arguably incorporates the full quantum of UCLA best practices; thus, helping to ensure the IP is properly drafted, prosecuted, and protected so as to minimize potential and foreseeable issues of misappropriation and other pitfalls.

If you or TDG do reach out to Dr. Novitch, can it be in a new email trend? as I would like to keep our discussions confidential for now. I also kindly ask you send Dr. Novitch a blank invention disclosure form to fill out without identifying my disclosure(s) to you for IP protection purposes.

Again, I thank you in advance for all your time, efforts, and assistance, I am deeply appreciative.

Harout

On Feb 20, 2024, at 10:01 AM, "Arora, Charanxit" <charanjit.arora@tdg.ucla.edu> wrote:

Hi Harout,

Thank you for sharing the draft manuscript, this is very helpful! Can you please update me on the submission of an updated invention disclosure? You may recall that the wrong documents were used for the initial disclosure to on Jan 19.

Please fill out the document that is embedded in the attached email. We will then process the document and will reach out to discuss next steps.

Best,

Charan

From: Harout Gulessarian HKG90@icloud.com
Subject: Re: Patenting rights
Date: April 7, 2024 at 8:17 PM
To: Arora, Charanjit charanjit.arora@tdg.ucla.edu

HG

Good evening Charan,

Hope all is going well on your end!

I have some good news. The principal investigator of the lab finally agreed to release the MTA and sponsor information per your request. I believe one of your ideas was to advance a barebones provisional/pre-patent application, with the notion of time stamping before the UPSPTO to try and secure first inventor to file status.

Do you mind if I cc you in a future email with the Principal Investigator of the lab where you would lay out the foundation needed from our end (kind of like a checklist) so as the PI and myself can supply all the data required to draft and prosecute the barebones pre-patent application. Moreover, we are wondering what are the additional items/steps so as to expedite this because there is great demand among our lab and the UCLA academic community to gather as much data as possible on this before we file the final permanent non-provisional application with USPTO; this would include, but not be limited to the use of the newly discovered protocol along with the use of the SB590885 molecule during neural induction so other labs across UCLA may in effect do a division of labor/fastest rate possible data gathering process for purposes of the final patent application and likely at least 2 academic papers post USPTO filing.

Please let me know if my rudimentary understanding is in error with any of the above matters. If so, then would you be so generous to help clarify and provide insight. I look forward to your response. As always, thank you in advance for your time, effort, and assistance; all deeply appreciated!

Harout

On Feb 28, 2024, at 3:03 PM, Arora, Charanxit <charanjit.arora@tdg.ucla.edu> wrote:

Hello Harout,

The sponsor and MTA information are critical for processing the invention report as there could be unhelpful terms in the agreements for IP protection purposes. So, yes, we will need Dr. Novitch's input.

Regarding your request to reach out to Dr. Novitch separately, in general we are unable to process an invention report without a PIs full approval and insight—and this requires that all communications pertaining to an invention are shared, as necessary. In other words, we are unable to put up a firewall between you and Dr. Novitch and hope you can work with your PI to submit a complete invention report with sponsor and MTA sections addressed. Otherwise, we will not be able to move forward to discuss patentability or commercialization of the invention.

Best,
Charan

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, February 27, 2024 4:57 PM
To: Arora, Charanxit <charanjit.arora@tdg.ucla.edu>
Subject: Re: Patenting rights

Dear Charan,

Per your request, attached below is essentially all the same substantive information found in the earlier draft. Procedurally, I noticed sections 2 –4 of this form request very specific and detailed information such as all funding sources, grants, etc.

07:44



Harout Gulessserian

338 posts



Posts

Replies

Highlights

Articles

Media

Likes

wasted time, Believing to stop
it, and to

0:07

From Spellbinding Odyssey

216

7.1K

32K

5.4M



Harout Gulessserian @HaroutGule... · 12/8/23

On sept/11/23 I made a scientific discovery using a molecule to make cerebral organoids from stemcells. This molecule has never been used before in making brain organoids. How do I protect my discovery/ intellectual property from being taken by others in the lab or community?

1



142



Harout Gulessserian @HaroutGule... · 12/8/23

@elonmusk please comment 🙏

0



135



You reposted

Proof of Confidential Counselling

Searching "Index" Found 8 Results

Kim, Caleb - Index - ID: 109214
(Confidential) Follow-up w/ Liana - d
Join Zoom Meeting: https://ucla.zoom.us/j/93210390653?pwd=ZXdzKlxWThGUDEpb3RjREJnN2YzUT09

Kim, Caleb - Index - ID: 109214
UCLA Staff & Faculty Counseling...
Hello, The UCLA Staff & Faculty
Counseling Center is requesting you...

Kim, Caleb - Index - ID: 109214
(Confidential) Follow-up w/ Liana - d
Join Zoom Meeting: https://ucla.zoom.us/j/93210390653?pwd=ZXdzKlxWThGUDEpb3RjREJnN2YzUT09
Meeting ID: 932 1039 0653
Passcode: 509324

Kim, Caleb - Index - ID: 109214
(Confidential) Appointment w/...
Join Zoom Meeting: https://ucla.zoom.us/j/97888122779?pwd=

Kim, Caleb - Index - ID: 109214
(Confidential) Follow-up w/ Liana - d
Join Zoom Meeting: https://ucla.zoom.us/j/93210390653?pwd=ZXdzKlxWThGUDEpb3RjREJnN2YzUT09

El: Now - Cloud March 8, 2024 at 3:00 PM

Bit found new contact info: Caleb Kim ckim@chr.ucla.edu

Join Zoom Meeting: <https://ucla.zoom.us/j/93210390653?pwd=ZXdzKlxWThGUDEpb3RjREJnN2YzUT09>
Meeting ID: 932 1039 0653
Passcode: 509324

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Caleb Kim
Office Coordinator
UCLA Staff & Faculty Counseling Center
310-794-0245 | M-F 8am-5pm Pacific Time
10320 Wilshire Blvd., Suite 380
Los Angeles, CA 90024
www.chr.ucla.edu/employee-counseling

Mail Attachment

From: Woods-Patin, Brenda J. bwoods@conet.ucla.edu
Subject: RE: General inquiry
Date: April 2, 2024 at 12:47 PM
To: Harout Gulesserian hkg90@icloud.com

BW

Harout,

Thank you for your email. Please call 310/825-7627 now **or** send me a telephone number and a time for me to call you.

Respectfully,

Brenda

Brenda Woods-Patin

Office of Ombuds Services

Please remember that e-mail is not appropriate for confidential communications. Due to the confidential, neutral, informal, and independent function of the Office of Ombuds Services, communication with the office does not constitute notice to the University.

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Monday, April 1, 2024 4:55 PM
To: Woods-Patin, Brenda J. <bwoods@conet.ucla.edu>
Subject: Re: General inquiry

Hello Brenda,

Thank you for reaching out on behalf of Thomas Griffin and Ariella Morrison regarding assistance in resolving the issues raised in our prior correspondence. Regretfully, the hostile workspace/retaliation/discrimination issues, which I request(ed) help for, sadly remain in effect so I am wondering when it would be a good time for me to call to schedule a time to speak with an Ombudsperson(s) because I really need some help with these things. My availability to speak with the office remains at your disposal. Please let me know when to call the office as I have many concerns and need some assistance. Thank you in advance for all your time, efforts, and assistance; all are deeply appreciated.

Harout

On Feb 26, 2024, at 1:28 PM, "Woods-Patin, Brenda J." <bwoods@conet.ucla.edu> wrote:

Thank you for your email. I am reaching out on behalf of Thomas Griffin and Ariella Morrison. The Office of Ombuds Services is a resource for those assistance in resolving conflicts, disputes, or complaints on an informal basis to all

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: First Day Back - Reminder - ACTION REQUIRED – Harout Gulessserian - HRC0301037

Date: August15,2024at2:08PM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu

Bcc: Vera Moubayed vmoubayed@mednet.ucla.edu

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 Gulessarian

On Aug 14, 2024, at 12:29, Harout Gulessarian <hkg90@icloud.com> wrote:

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

On Aug 14, 2024, at 08:30, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

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

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, August 13, 2024 4:20 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Cc: UCLA Health Employee Relations
<UCLAHealthEmployeeRelations@mednet.ucla.edu>; LOA Team
<LOATeam@mednet.ucla.edu>
Subject: Re: First Day Back - Reminder - ACTION REQUIRED – Harout Gulessarian - HRC0301037

Hi Helen,

I wanted to update you on my situation today. I spent the day sitting in the lobby of CHS and the biomedical library at CHS because I was instructed not to go up to the lab unless I had an assignment in a previous correspondence. I reached out to Ben earlier for direction, and he responded around 2:30 PM, informing me of his absence from the lab, but was willing to meet with me over zoom sometime in the next day to discuss my return, schedule, plans, and expectations.

Ben also mentioned that both you, and Mark were aware of his situation. However, this information was never communicated to me, so I've been here on the first floor of CHS all day waiting for a response.

I also wanted to note that I reported back to work today, but was unable to update the Employee Experience Center task because my login was, and continues to be locked. Furthermore, can you kindly fill out my timesheet as well? hopefully reflecting the hours of last week, yesterday, and today.

Thank you for your all of your time and assistance; they are deeply appreciated!

Thank you for your all of your time and assistance; they are deeply appreciated!

Best regards, Harout Gulessrian

On Aug 12, 2024, at 16:59, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

Thank you for reaching out to me to clarify your return. As part of your Return-to-Work process, please reach out to Dr. Novitch to schedule a Return-to-Work meeting for Tuesday August 13, 2024 in the morning. Thank you for your patience as we are processing your return.

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 <

From: Harout Gulessrian <hkg90@icloud.com>
Sent: Monday, August 12, 2024 4:22 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Cc: UCLA Health Employee Relations <UCLAHealthEmployeeRelations@mednet.ucla.edu>; UCLA Health HR <UCLAHealth-HR@mednet.ucla.edu>; LOA Team <LOATeam@mednet.ucla.edu>
Subject: Re: First Day Back - Reminder - ACTION REQUIRED – Harout Gulessrian - HRC0301037

Dear Helen,

Cc'd in this email: UCLA Health Employee Relations, UCLA LOAteam, and UCLA-Health HR.

I hope this email finds you well. I am writing to address my return to work date issue, as outlined in the email I received from Mark Lucas on [08/05/2024 5:33pm].

Per my original physician's note, my return date was set for **August 6, 2024** (You have this document in your possession so does Mark Lucas). However, Mark Lucas communicated to me that, due to Professor Novitch's absence, my return date would be extended to August 13,

Novitch's absence, my return date would be extended to August 13, 2024 (See attached below). Following this clear instruction from Mark Lucas, I prepared to return on **August 13th** as directed even though I was ready to return on the **August 6th** originally.

It has now come to my attention that there is a claim that the expected return date was actually intended to be August 12th. There is no way I could have known that "**August 13th**" actually meant **August 12th**. I followed the instructions provided in Mark Lucas's email in good faith, and it is unreasonable to expect me to have somehow interpreted the date differently.

I would appreciate it if this matter could be resolved promptly and with the understanding that I adhered to the instructions given to me by Mark Lucas.

Best regards, Harout Gulessrian

Attached: Email from Mark Lucas to Harout Gulessrian on 8/5/2024

<image002.png>

On Aug 12, 2024, at 13:37, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

According to our records, you are scheduled to return to work from your leave of absence today, 08-12-2024.

Please advise us if you are back at work today by completing the task assigned to you in Employee Experience Center: [HERE](#)

You can also see the task under Employee Experience Center > My To-dos

Your manager, Harout Gulessarian, may also reach out to me to confirm.

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

IMPORTANT:

All UCLA Health Workforce members must provide verification of their COVID vaccine or request an exception on myUCLAHealth by September 1, 2021.

If you are not yet vaccinated, UCLA Health employees can book an appointment with UCLA Occupational Health Services by calling 310-825-6771. You can also book an appointment using your myUCLAHealth portal.

For information on requesting an exemption, please visit
<https://www.uclahealth.org/hr/covidvacexception>

If you have any questions about this, please call me at (310) 794-0301 or email me at HelenANguyen@mednet.ucla.edu

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 <image001.png>

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Lucas, Mark

Return to lab

To: hkg90@icloud.com

Inbox - iCloud August 6, 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 13th.

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

Best,

Mark Lucas

Chief Administrative Officer

Department of Neurobiology

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HN Found in Home - iCloud Mailbox

Nguyen, Helen A.

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

To: Harout Gulessarian, Cc: Novitch, Bennett, Lucas, Mark

August 12, 2024 at 1:31 PM

Details

Siri found new contact info: Helen A...Nguyen.HelenA@mednet.ucla.edu

[add...](#)

Hi Harout,

According to our records, you are scheduled to return to work from your leave of absence today, 08-12-2024.

Please advise us if you are back at work today by completing the task assigned to you in Employee Experience Center: [HERE](#)

You can also see the task under Employee Experience Center > My To-dos

Your manager, Harout Gulessarian, may also reach out to me to confirm.

It is very important that we receive confirmation of your return to work in order to reactivate your AD Login and timesheet access.

IMPORTANT:

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If you are not yet vaccinated, UCLA Health employees can book an appointment with [UCLA Occupational Health Services](#) by calling 310-825-6771. You can also book an appointment using your [myUCLAHealth](#) portal.

For information on requesting an exemption, please visit <https://www.uclahealth.org/hr/covidvacexception>

If you have any questions about this, please call me at (310) 794-0301 or email me at HelenA@mednet.ucla.edu.

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: HelenA@mednet.ucla.edu

UCLA Health

HN Found in Sent - iCloud Mailbox

Harout Gulessarian

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

To: Nguyen, Helen A., Cc: Health Employee Ucla, UCLAHealth-HR@mednet.ucla.edu, LOA Team

August 12, 2024 at 4:22 PM

Details

Dear Helen,

Cc'd in this email: UCLA Health Employee Relations, UCLA LOATeam, and UCLA-Health HR.

I hope this email finds you well. I am writing to address my return to work date issue, as outlined in the email I received from Mark Lucas on [08/05/2024 5:33pm].

Per my original physician's note, my return date was set for **August 6, 2024** (you have this document in your possession so does Mark Lucas). However, Mark Lucas communicated to me that, due to Professor Novitch's absence, my return date would be extended to **August 13, 2024** (See attached below). Following this clear instruction from Mark Lucas, I prepared to return on **August 13th** as directed even though I was ready to return on the **August 6th** originally.

It has now come to my attention that there is a claim that the expected return date was actually intended to be **August 12th**. There is no way I could have known that "August 13th" actually meant **August 12th**. I followed the instructions provided in Mark Lucas's email in good faith, and it is unreasonable to expect me to have somehow interpreted the date differently.

I would appreciate it if this matter could be resolved promptly and with the understanding that I adhered to the instructions given to me by Mark Lucas.

Best regards,
Harout Gulessarian

 **Harout Gulessarian**

Re: First Day Back - Reminder - ACTION REQUIRED - Harout Gulessarian - HRC0301037
To: Nguyen, Helen A.; Cc: UCLA Health Employee Relations; LDA Team

Siri found new contact info: Helen A. Nguyen HelenANguyen@mednet.ucla.edu

Hi Helen,

I wanted to update you on my situation today. I spent the day sitting in the lobby of CHS and the biomedical library at CHS because I was instructed not to go up to the lab unless I had an assignment in a previous correspondence. I reached out to Ben earlier for direction, and he responded around 2:30 PM, informing me of his absence from the lab, but was willing to meet with me over zoom sometime in the next day to discuss my return, schedule, plans, and expectations.

Ben also mentioned that both you, and Mark were aware of his situation. However, this information was never communicated to me, so I've been here on the first floor of CHS all day waiting for a response.

I also wanted to note that I reported back to work today, but was unable to update the Employee Experience Center task because my login was, and continues to be locked. Furthermore, can you kindly fill out my timesheet as well? hopefully reflecting the hours of last week, yesterday, and today.

Thank you for your all of your time and assistance; they are deeply appreciated!

Best regards,
Harout Gulessarian

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

 Found in inbox - iCloud Mailbox

Nguyen, Helen A.

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

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, (Sha/Hen/Hers)
Human Resources Analyst
Department of Neurobiology
David Geffen School of Medicine at UCLA
P:(424) 440-3429
E: HelenANguyen@mednet.ucla.edu

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: First Day Back - Reminder - ACTION REQUIRED – Harout Gulessserian - HRC0301037
Date: August 15, 2024 at 2:08 PM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu
Bcc: Vera Moubayed vmoubayed@mednet.ucla.edu

HG

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.



Nguyen, Helen A.

Return to Work

To: Harout Gulessarian Cc: Bennett Novitch (bnovitch@ucla.edu) <bnovitch@ucla.edu>

Inbox - iCloud August 16, 2024 at 8:25 AM

Details

Siri found new contact info: Helen A. Nguyen helenanguyen@mednet.ucla.edu

add...

August 16, 2024

Harout Gulessarian

Dear Harout,

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

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

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

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

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

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

Best wishes,

Ben Novitch, Ph.D.

Helen A. Nguyen, MBA

Best Regards,

Helen Nguyen, (She/Her/Hers)
Human Resources Analyst
Department of Neurobiology
David Geffen School of Medicine at UCLA
P-1044 440-3429
E: Helen.Anguyen@mednet.ucla.edu

UCLA Health

 Harout Gulessarian
Re: Return to Work
To: Nguyen, Helen A.; Bazz, Inra Mousavai

Sent - iCloud - August 16, 2023 at 12:58 PM

Details

Dear Helen,

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

1 Working hours Schedule:

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

2 Remote Work:

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

3 Research Focus:

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

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

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

I trust that these clarifications can be addressed promptly.

Sincerely,
Harout Gulessarian

Lucas, Mark
RE: FMLA/Healthcare Matters
Re: Harout Gulesserian

Move to...
Info - iCloud April 26, 2024 at 2:42 PM

Hi, Harout. Thank you for your e-mail and the background. I want to focus this e-mail to help with the Leave questions. We can discuss the other item you cite separately.

You receive vacation and sick accruals each pay period. For vacation, the policy is that you need to request it in advance and approval is at the discretion of your supervisor based on institutional needs. Dr. Novitsch told me that you asked for 3 weeks off (vacation) and he asked to meet with you to review how items in the lab would be handled during your absence. He said that you did not respond and just took off on Friday. He assumed you were out on the 3 week (unapproved) vacation until he saw you yesterday afternoon in CHS. If you'd like to use vacation, I'd recommend simply requesting and making sure that you liaise with your supervisor to make sure that they are aware of what is pending and how to traffic during your absence.

For sick leave, it obviously would not require pre-approval. You cannot control illness. You do need to let your supervisor know if you're out sick for a day. They cannot deny this. If you need to be out longer than 2 consecutive days, DGSCM policy requires a doctor's note to use the paid sick time. If you are out longer, there is not an issue with this, but we are required to offer you FMLA. FMLA = the Family Medical Leave Act, which in short states that you cannot lose your job or benefits while on leave. It says nothing about pay. We would ask that you speak with the department HR rep (Helen Nguyen, or me if preferred) if you do plan to be out for an unplanned illness or extended length of time. There is a small bit of paperwork and the need for a doctor's note. This is designed to protect you during your leave while recovering from your illness. For reference material, please see: <https://uonet.universityofcalifornia.edu/wp-content/uploads/foms/pdf/family-medical-leave.pdf>.

It may be easiest at this juncture to contact Helen (helennguyen@mednet.ucla.edu) and discuss what you want to do and she can initiate the process/paperwork.

Please let me know if this helps. Thanks.

From: Harout Gulesserian <tkg90@icloud.com>
Sent: Thursday, April 26, 2024 5:21 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Subject: FMLA/Healthcare Matters

Hello Mark.

I may be in error, but from what I can understand, it appears that using my vacation time for my Healthcare matters remains not approved. That being said, I want to thank you in advance for assistance regarding the immediate processing of my FMLA Healthcare matters which I requested with immediate effect last night as an alternative option from my prior requested vacation time regarding my Healthcare matters.

Given the FMLA process is virtually foreign to me at this juncture I appreciate any and all assistance towards helping me identify my FMLA/Healthcare leave options so as to further advance my existing Healthcare needs. If you can kindly forward to me the proper UCLA link(s), contact person info, and/or any other necessary details guiding me in the right direction to insure I am properly and thoroughly using any and all relevant applicable benefits, Healthcare or otherwise qualifiable.

Next, I notice you mention that I didn't show up to work on Friday, but I submit that given Samantha Butlers outrageous conduct towards me (as I noted to you in my prior email which I incorporate by reference here), I believe Samantha's conduct was intended to cause me emotional distress by somehow knowing that I was



Harout Gulesserian

Harout Gulesserian sick time off
To: helennguyen@mednet.ucla.edu

April 26, 2024 at 1:40 PM

Good afternoon Helen,

Per Mark Lucas:

"There is a small bit of paperwork and the need for a doctor's note. This is designed to protect you during your leave while recovering from your illness. For reference material, please see: <https://lucel.universityofcalifornia.edu/hz-content/uploads/forms/pdf/family-medical-leave.pdf>.

It may be easiest at this juncture to contact Helen (helennguyen@mednet.ucla.edu) and discuss what you want to do and she can initiate the process/paperwork."

I notified Mark Lucas via email (effective 4/24/2024) that I was taking sick time off from work, and asked to get the paperwork completed. Mark basically said to reach out to you (as mentioned above) for the completion.

Please let me know any and all necessary information and actions that I must resolve to complete all of the requisite tasks to have this completed.

Harout Gulesserian



Harout Gulesserian

Re: Harout Gulesserian sick time off
To: helennguyen@mednet.ucla.edu

April 27, 2024 at 12:58 PM

Hi Helen,

I am following up on my previous request (4/26/2024) for FMLA sick time leave documents, and/or the protocol for completion of FMLA leave.

Please reach out asap as time is of the essence, thank you.

Harout.

[See More from Harout Gulesserian](#)

ML

Lucas, Mark

Re: Meeting

To: Harout Gulessarian; Cc: BENNETT NOVITCH, Gulessarian, Harout K.

Inbox > iCloud April 25, 2024 at 7:40 AM

Details



Hi, Harout. I'm the person who needs to help process the leave. This is what I am referring to. Ben did mention that you wanted to take vacation (3 weeks) and then said you didn't show up to work on Friday. Approval of vacation is at the discretion of your supervisor (based on institutional needs). However, you can certainly take a medical leave (under FMLA) at any time and this is what I was hoping to discuss/facilitate. Thanks.

On Apr 25, 2024, at 1:03 AM, Harout Gulessarian <hkg90@icloud.com> wrote:

Hi Ben,

Currently I have reached out to UCLA admin regarding times and schedules affecting my healthcare matters. As soon as UCLA admin responds to me, and I have a better understanding of timelines and availabilities per UCLA admin, then I will subsequently reach out to you with less speculative and hopefully more accurate information per your request.

Thanks,

Harout

On Apr 24, 2024, at 9:24 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Hi Harout,

What are your plans for the remainder of this week- will you be in either tomorrow or Friday? If you are, I would like to arrange times for us to talk, and for you to speak with Mark Lucas, either in person or over zoom.

Please let me know what is possible.

Thanks,

Ben

 Harout Gulessarian
Update: Healthcare matters
To: Mark Lucas, Cc: BENNETT NOVITCH

April 26, 2024 at 3:04 PM

[Details](#)

Hello Mark and Ben,

Good day. I am currently tending to important healthcare matters. Mark mentioned that I contact Helen Nguyen to complete the paperwork for sick time/illness matters:

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

Unless I am mistaken, it appears once the healthcare/ sick-time paperwork is completed it is likely Helen will forward all necessary documents to all necessary UCLA departments.

Once again, at the earliest time after I resolve my healthcare matters, I will respond and return to any and all laboratory matters/items.

Thanks,
Harout

 Lucas, Mark
RE: Update: Healthcare matters
To: Harout Gulessarian, Cc: BENNETT NOVITCH

April 26, 2024 at 2:13 PM

[Details](#)

Hi, Harout. Can you please share your plans? I'm unclear what you're proposing. Thanks.

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Friday, April 26, 2024 2:05 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Cc: BENNETT NOVITCH <bnovitch@g.ucla.edu>
Subject: Update: Healthcare matters

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

6

From: Harout Gulessrian HKG90@icloud.com **Subject:** FMLA/Healthcare Matters

Date: April25,2024at5:20PM
To: Mark Lucas MLucas@mednet.ucla.edu

Hello Mark.

I may be in error, but from what I can understand, it appears that using my vacation time for my Healthcare matters remains not approved. That being said, I want to thank you in advance for assistance regarding the immediate processing of my FMLA Healthcare matters which I requested with immediate effect last night as an alternative option from my prior requested vacation time regarding my Healthcare matters.

Given the FMLA process is virtually foreign to me at this juncture I appreciate any and all assistance towards helping me identify my FMLA/Healthcare leave options so as to further advance my existing Healthcare needs. If you can kindly forward to me the proper UCLA link(s), contact person info, and/or any other necessary details guiding me in the right direction to insure I am properly and thoroughly using any and all relevant applicable benefits, Healthcare or otherwise qualifiable.

Next, I notice you mention that I didn't show up to work on Friday, but I submit that given Samantha Butlers outrageous conduct towards me (as I noted to you in my prior email which I incorporate by reference here), I believe Samantha's conduct was intended to cause me emotional distress by somehow knowing that I was out on Healthcare matters Friday, which I believe exemplified a reckless disregard for my privacy, healthcare and employment rights among others; given Samantha Butler is not my supervisor and I do not work in her lab, it is axiomatic that I now tend to believe that any information indicating I did not go to work on Friday could very well have been presented to you with retaliatory and discriminatory animus intended to be intentionally misleading, deceitful, and defamatory/slanderous, among other things, as such I am attaching and incorporating herein the relevant emails, in part, below.

In an abundance of caution, I would like to inform you that I in-fact had noticed Ben that I was going to be out Friday due to Medical/Healthcare issues. In fact, not only did I notice Ben of this, I submit that Ben responded to my notice saying (I quote in relevant part): "Hi Harout, I really appreciate your sending me this message and letting me know what you are up to..."

Specifically, Ben was responding to my Healthcare/FMLA message to him where I specifically emailed Ben and said the following (I quote, in relevant part): "Hello Ben, hope all is well. I have a few healthcare matters today that I am tending to. At the earliest time after my healthcare matters, I will respond to any and all laboratory items and matters".

Consistent with my Medical/Healthcare issues that I was tending to Friday I was out due to my instant Healthcare matters until April 24, 2024. Given some of the outrageous statements made to me by Samantha Butler in Ben Novitch's presence yesterday, in relevant part that I was going to get fired or written up for "walking off the job" due to my Healthcare matters is not only a substantial factor in furthering outrageous retaliatory and harassing conduct in the presence of my supervisor Ben, but I submit it was intended to inflict injury to me as I submit Samantha engaged in this reckless conduct with the realization that injury will result to me from these statements, and this is why I don't mean to digress from the FMLA Healthcare issues that you are helping me with, but I believe the email correspondence between Ben and I is the best evidence of the fact that Ben (and somehow Samantha Butler) knew that I

was tending to my Healthcare matters on Friday and it's important for you to have that information to prevent any misleading statements regarding Friday given it was put in issue by Ben to you in your capacity as the Neurobiology CAO.

I noticed directly UCLA/BEN NOVITCH (since at least last year) that I was, and remain exposed to what I submitted/submit remains unlawful, discriminatory, harassing, retaliatory and otherwise harmful conduct in the lab, and I believe the discriminatory animus is fostering retaliatory conduct by Ben and

conduct in the lab, and I believe the discriminatory animus is fostering retaliatory conduct by Ben and others in lab against me for very important complaints, such as, without limitations, discrimination based on ethnic/looks/speech, retaliation for whistle blowing regarding written intent of misappropriation of UCLA intellectual property, UCLA Trade Secrets, possibly patentable and otherwise, draftable and prosecutable UCLA intellectual property which I discovered by accident during my work in the lab on September 11 2023; now given the extreme and outrageous statements and conduct of Samantha Butler with my Supervisor Ben Novitch by her side yesterday, and given the above issues, I now have some basis to believe, that I can most certainly add retaliation to me for all the items I prior noticed Ben/UCLA for, without limitations, but as it seemingly appears to the extent there maybe any misleading statements regarding my Healthcare matters on Friday, I very respectfully submit there is active retaliation by Samantha Butler and Ben Novitch for me tending to my Healthcare matters, among the many other reasons that I have already prior noticed UCLA and Ben Novitch of in writing.

In fact, in an abundance of caution, to show that there may very well be misleading and deceitful statements posed to you regarding "me not showing up to work on Friday," I am attaching screen shots of the relevant email exchange that conclusively establishes that Ben in fact knew that I was tending to healthcare matters and that I was going to in fact tend to laboratory issues post my healthcare matters (Which is exactly what I attempted to do). Once I was back to work on 04/24/2024, as is the same day that Samantha Butler seemingly assaulted, defamed, slandered, and otherwise threatened and harmed me because at the time and now I believe(d) that there remains an anticipation of harm towards me as I have a right to come to work without being put in fear of personal harm to me. This is not the first time that I am subjected to these kind of hostile actions by Ben and it appears that also Samantha Butler is on the same page and I am just respectfully requesting that my right to come to work and do my job without me being put in fear of personal harm to myself by Ben Novitch and now Samantha Butler and all lab member(s), as something like this occurred back in February 2024, but that was by Ben Novitch only and not Samantha.

That being said, I returned to work on 24 April 2024, and I was in fact attempting to do my job, and I was in fact doing my job until ~4:10pm (embarrassingly there were witnesses) where I was harassed, slandered, and defamed by Samantha Butler in front of UCLA Bystanders on the first floor with Ben Novitch my supervisor by Samantha's side, and again Ben failed to take any reasonable actions to curb such harmful words and conduct directly at me by another UCLA employee (Samantha Butler).

Again, sorry for digressing as I am certain you understand, but it's hard enough dealing with the heavy Healthcare issues I face, thus if you can kindly guide me and help insure, I complete all the requisite steps for FMLA/Healthcare leave, so I can move forward with my Healthcare matters and try to recover from my pending Healthcare issues, then deeply appreciative I remain to you for reaching out to help me.

In the event it is necessary, I do have documentary evidence of my Healthcare issues, but of course I certainly make no waivers as I reserve all rights and remedies as I attempt to deal with my Healthcare road towards recovery.



From: [Harout Gulessarian](#) >
To: [BENNETT NOVITCH](#) >
April 19, 2024 at 12:00 PM

Re: Time off request

Hello Ben,

Hope all is well. I have a few healthcare matters today that I am tending to. At the earliest time after my healthcare matters, I will respond to any and all laboratory items and matters.

Thanks,
Harout

On Apr 18, 2024, at 9:32 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

Hi Harout,

I am supportive of your taking a vacation in the

very near future. However, the timing and length of your request are unusual both in the very short notice that you're giving and the prolonged length of time away. As such, I cannot approve it straight away, and will need to consult with Mark



New Message

8:01



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< Inbox

4 Messages

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BN

From: BENNETT NOVITCH ✉
To: Harout Gulesserian
April 19, 2024 at 12:42 PM

Re: Time off request

Hi Harout,

Hi Marou,

I really appreciate your sending me this message and letting me know what you are up to. Will you be coming in at all today and/or early next week? Is it really important that we discuss some preparation steps before you leave for a vacation.

With that in mind, I have started a conversation with Erick, and he showed me all of the culture that you have going, and gave me some insights into the workflow of the experiments. I nevertheless have many questions, and feel that we need to collectively discuss the timelines for each of the experiments that are ongoing, particularly what the end points are for sample collection and, subsequently, analysis. I got the sense that Erick is versed in feeding the cultures, but doesn't know where the goalposts are. My sense is also that he doesn't have much capacity



New Message

Thanks,
Harout Gulessrian

From: "Lucas, Mark" <MLucas@mednet.ucla.edu>
Date: April 25, 2024 at 7:40:14 AM PDT
To: Harout Gulessrian <hkg90@icloud.com>
Cc: BENNETT NOVITCH <bnovitch@g.ucla.edu>, "Gulessrian, Harout K." <HGulessrian@mednet.ucla.edu> **Subject: Re: Meeting**

Hi, Harout. I'm the person who needs to help process the leave. This is what I am referring to. Ben did mention that you wanted to take vacation (3 weeks) and then said you didn't show up to work on Friday. Approval of vacation is at the discretion of your supervisor (based on institutional needs). However, you can certainly take a medical leave (under FMLA) at any time and this is what I was hoping to discuss/facilitate. Thanks.

On Apr 25, 2024, at 1:03 AM, Harout Gulessrian <hkg90@icloud.com> wrote:

Hi Ben,

Currently I have reached out to UCLA admin regarding times and schedules affecting my healthcare matters. As soon as UCLA admin responds to me, and I have a better understanding of timelines and availabilities per UCLA admin, then I will subsequently reach out to you with less speculative and hopefully more accurate information per your request.

Thanks, Harout

On Apr 24, 2024, at 9:24 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote: Hi Harout,

What are your plans for the remainder of this week- will you be in either tomorrow or Friday? If you are, I would like to arrange times for us to talk, and for you to speak with Mark Lucas, either in person or over zoom.

Please let me know what is possible. Thanks,
Ben



From: **Subject:** Date: To:

Bcc:

Harout Gulessserian HKG90@icloud.com
Harout Gulessserian Case # HRC0301037
May 23, 2024 at 4:55 PM
UCLAHealth-HR@mednet.ucla.edu, LOATeam@mednet.ucla.edu, uclahealthemployeerelations@mednet.ucla.edu, dpo@equity.ucla.edu

Harout Gulessserian hkg90@icloud.com

PLEASE BE PUT ON NOTICE THAT I AM BEING HARMED because someone within UCLA's system is either intentionally or at best negligently misrepresenting facts with the intent to violate my FMLA rights. Below is evidence that I have complied with all necessary FMLA Healthcare Certification, and despite the below attached evidence completed and timely attempts to deliver and ultimate delivery of Healthcare Certification by Harout Gulessserian, some representatives from UCLA are making complete inconsistent and opposite statements than other representatives of UCLA.

As what appears to be a pattern of adverse employment action and a trend to violate my FMLA leave rights the following statements are being repeatedly represented to me (Harout Gulessserian) as facts that are true, but as the evidence below conclusively establishes these representations are in fact not true.

Moreover, after one look at the UCLA System (see the evidence below) it becomes obvious that there is no way anyone can have an honest belief that all required Healthcare Certifications were not timely delivered (or attempted to deliver because UCLA intentionally not taking my delivered Healthcare Certification does not mean that I have not complied with things from my end, so it is obvious that the representations that both required Healthcare Certifications were in fact delivered from me Harout Gulessserian to UCLA timely and that in fact UCLA has the respective Healthcare Certifications in the UCLA system is patently 100% true.

Once I (Harout) delivered my respective Healthcare Certifications to UCLA I Harout reasonably relied on UCLA staff's representation that my Healthcare Certifications are in the UCLA system and received by UCLA, denying this truth, by locking me out of my UCLA health Benefits while I am on FMLA leave I am most vulnerable and most harmed; If you read the instructions to me from UCLA LOA Team and my assigned Leave Analyst and all the other evidence, it is obvious that I Harout relied on these representations and that this in fact is a substantial factor in causing retaliatory and FMLA violation harms to me (Harout) while I remain on FMLA leave. Again please look at the attached evidence and please begin an investigation as to who has locked me out of my UCLA access so as for me not to be able to access UCLA Health needs while I am on FMLA leave.

False statement #1:

"Dear Harout,

On 05-07-2024 you were sent an email asking you to provide information related to your request for Family and Medical Leave (FL) for Own illness or injury (non-work related). You were asked to complete and return the following form(s) within 15 calendar days :

- Certification of Healthcare Provider

As of this date, we have not received the completed form and you have not advised us of any reasons for this delay.."

The evidence below shows that UCLA received and has in its system the " Certification of Healthcare Provider."

False Statement #2

"Dear Harout,

Your request for use of FMLA has not been approved as yet. We wanted to remind you that you were provided with 15 days (through May 15, 2024) to submit medical certification. Your absence from work is currently unauthorized and unexcused. Can you please contact us to provide and/or reply to the LOAN system e-mail that was sent on April 30, 2024 from UCLA Health? Thanking you in advance."

The evidence below shows that in fact the "certification" was in fact uploaded using the docusign and is in the UCLA system at the time the above false statement was sent to me (Harout Gulessarian)

This harm is violative of my FMLA rights, among many others.

Please investigate why the above false statements, and why I am locked out of the UCLA Health System, while at the same time UCLA expects me to do things in side the very system UCLA has locked me out of yet UCLA is set to blame me for not being able to access a system which UCLA locked me out of in the first place.

Next, I am writing in response to the message I received yesterday from the department, which stated a failure in providing the LOA/HR office the "Certification of Healthcare Provider" per the FMLA request. The email mentioned, "As of this date, we have not received the completed form, and you have not advised us of any reasons for this delay." This issue was previously addressed with other UCLA supervisors, who seem to be punishing me for being absent under FMLA leave by pretending not to see the uploaded Healthcare Certificates. This is an effort to claim non-compliance on my part when, in fact, I have provided evidence (see below) that all required Healthcare Certifications were delivered to UCLA in a timely manner. See evidence of the delivered and uploaded healthcare documentation. It appears that there is some interference with my FMLA rights, as despite having already delivered the requisite Healthcare Certification, it seems that someone or some group at UCLA is expecting the impossible task of me uploading documents through UCLA's portal system, which I assert are already in the UCLA system.

Meanwhile, all my access has been stripped away while I remain out on FMLA leave. Until another explanation arises, it appears someone at UCLA has locked me out of my UCLA

accounts. I submit this was likely done to violate my FMLA rights by making it appear that UCLA's system does not recognize my requests and especially precludes me from delivering Healthcare Documentation, which has already been delivered, while at the same time trying to fault me for it as if it is my delay or error. In this case, it is not, because I submit I am locked out by someone's intentional request to lock me out.

I request an investigation be made into who cut my access to upload health documents onto my UCLA account while I am on FMLA leave. PLEASE PROVIDE AN INVESTIGATION AND EXPLANATION: WHO LOCKED ME OUT & WHY AM I BEING TOLD THAT I FAILED TO DELIVER HEALTHCARE CERTIFICATION WHERE IN FACT I ALREADY HAVE DONE SO AS IS PROVABLE BY THE EVIDENCE. Unfortunately, it seems a false narrative is being painted. Please see all of the screenshots below as I have provided all the necessary healthcare documentation during my unfortunate FMLA leave.

I also submit that I reached out to five different individuals/offices, all cc'd in the same email providing my documentation for extension of the FMLA (see below), along with reaching out to C. Smith because V. Manlutac was out of office. I've made numerous attempts to comply with the rules and policies set forth by the university. My Healthcare Certification extension note was in fact submitted to UCLA online, and to C. Smith last Friday and even before that I had attempted to reach out to my Leave Analyst (Valentino) to specifically deliver my Healthcare

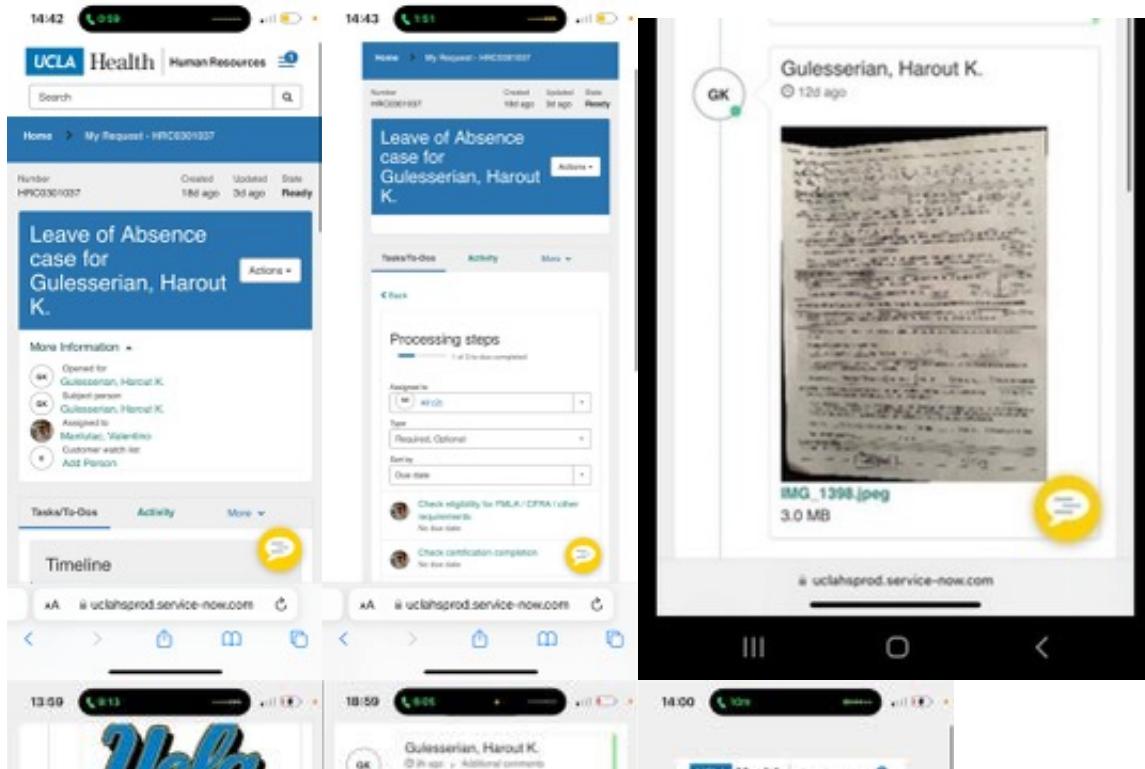
attempted to reach out to my Leave Analyst (Valentino) to specifically deliver my Healthcare Extension note to UCLA in a timely manner.

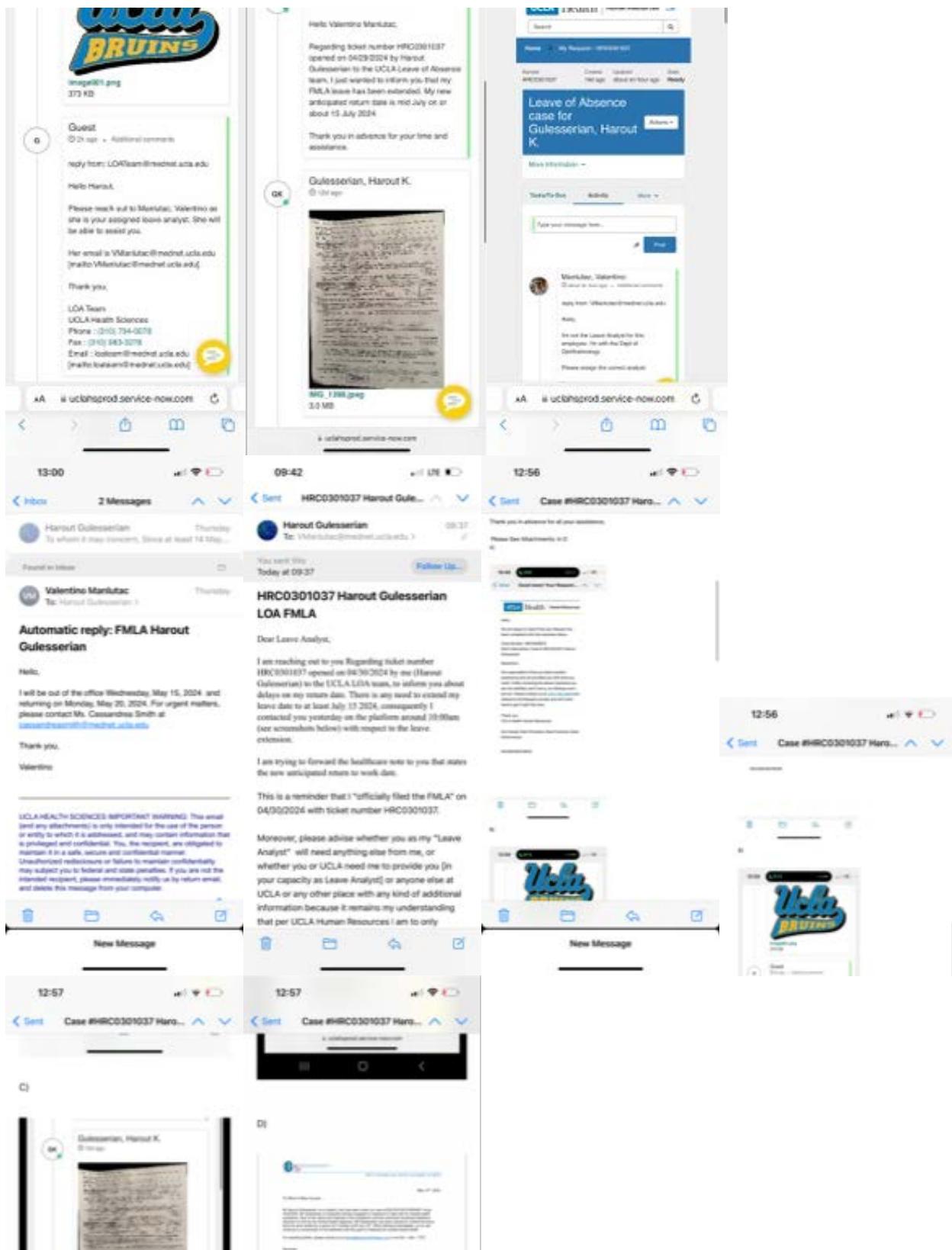
PLEASE ALSO GIVE NOTICE TO ME WHEN MY ACCESS TO UCLA SYSTEMS WILL BE RESTORED/RETURNED AS IT IS IMPOSSIBLE FOR ME TO COMPLY WITH ANY DEMANDS TO UPLOAD MATERIALS IN THE UCLA SYSTEM FROM THE ONE HAND WHILE BEING LOCKED OUT OF THE VERY SAME SYSTEM UCLA EXPECTS ME TO USE TO SATISFY UCLA DEMANDS.

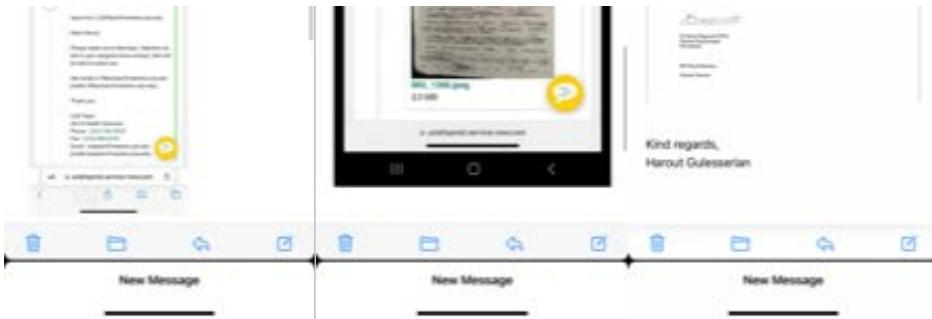
Therefore, as I noted to UCLA Supervisors not long ago, I am at a complete loss and at the complete mercy of UCLA Health HR & LOA Team & my assigned Leave Analyst(s). This type of occurrence does not happen without a mistake somewhere solely in UCLA's systems control. Most importantly, I can assert that I did not contribute to the cause of such mistakes, especially, but not limited to, being locked out of the UCLA system when I need it most for my benefits and other information, which is absolutely vital while I remain on FMLA leave. I submit the gamesmanship is violative of my FMLA rights.

Therefore, I very respectfully reserve all rights and make no waivers. Thank you in advance for all your hard work and assistance. I deeply appreciate this and am certain you understand how difficult it is not to be able to access my UCLA Health and deal with these issues while being out on FMLA leave.

Sincerely,
Harout Gulessarian

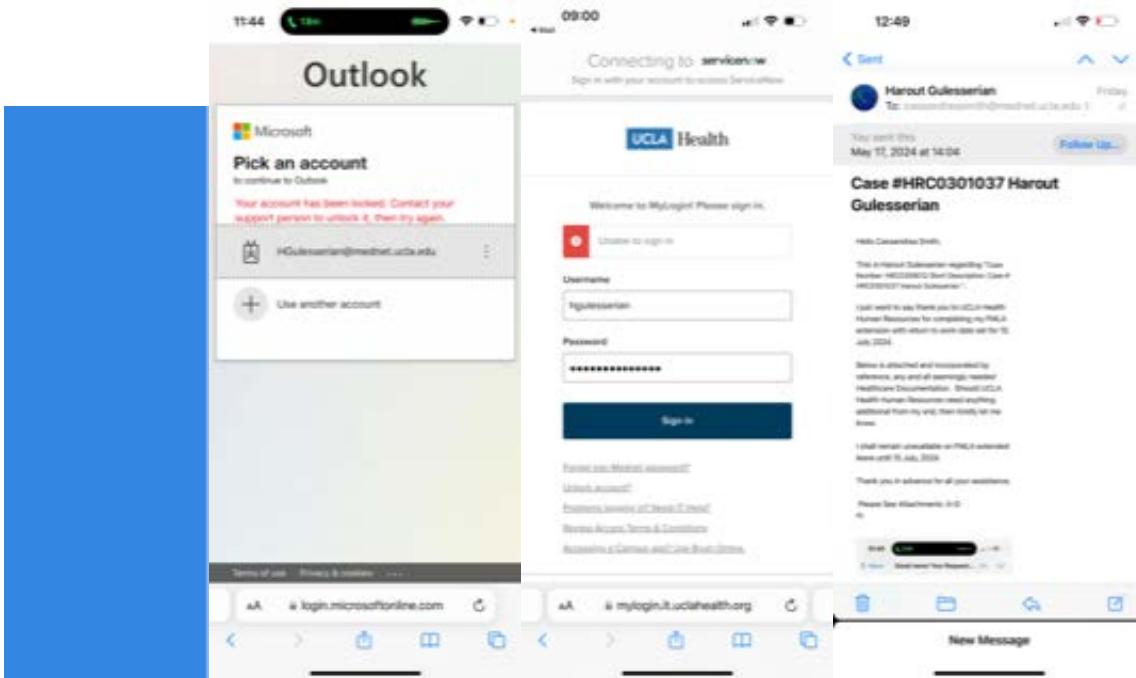






"You can upload your documents to your case by completing the task assigned to you in Employee Experience Center: HRC0304603"

"You can also see the task under Employee Experience Center > My To-dos"





Nguyen, Helen A.

RE: HRC0301037 LOA - Harout Gulesserian
To: Harout Gulesserian

May 29, 2024 at 4:01 PM

Hi Harout,

I am following up with you on your Leave request. As of today's date, I have not received your completed designation form for your leave of absence. Please note that I will need your documents to process your leave, please return the documents by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

Best Regards,

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



Harout Gulesserian

Re: HRC0301037 LOA - Harout Gulesserian
To: Nguyen, Helen A.

May 31, 2024 at 12:41 AM

Hello Helen,

On 05/28/2024 I received confirmation from Employee Relations Management that my FML was appropriately processed by you as the new leave analyst and all should be in order at this time.

Regarding the document there appear to some issues:

First, it appears my Healthcare Providers indicated that they need to see the attached "job description". The form states "A job description listing the essential functions of your position is attached to the Return to Work Certification" but the Healthcare Providers indicated that in fact no job description listing essential functions is on the document. Can you kindly attach the job description for the Healthcare Providers purposes and extend the 5/31/24 date due to the Healthcare providers earliest availability.

Second, the part of the document stating: "Document For block leaves: Start date: Anticipated End Date: Return to Work Date." The dates there appear inconsistent from the part of the document that references an FML end date of "May 15, 2024." Instead, UCLA Health HR and LOA and Employee relations have received the updated note stating a return date of July 15 2024.

Finally, the portion of the document indicates the following: "Once we obtain the information from you as specified above, we will inform you, within 5 business days, whether your leave will be designated as FML and count towards your FML leave entitlement. Meanwhile, WE HAVE PROVISIONALLY DESIGNATED YOUR LEAVE AS FML. If you have any questions, please do not hesitate to contact." I would like to call your attention to two matters. Firstly, the Healthcare Certification regarding the extension of the initial approved FML was both timely forwarded to my assigned leave analyst on the LOA system Valentino and his Co Leave Analyst Cassandra and appears approved based on correspondence of UCLA Employee Relations Management; moreover, more importantly the Healthcare Certification was further evidenced and uploaded in the UCLA LOA system on 05/03/2024 and it appears the matters of extension (uploaded 5/14/2024) approval are already approved by UCLA.

Thank you,
Harout Gulesserian

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



Nguyen, Helen A.

RE: HRC0301037 LOA - Harout Gulessarian
To: Harout Gulessarian

May 31, 2024 at 12:47 PM

Hi Harout,

See attached your job description to provide to your Healthcare Provider. Your request to extend the designation document have been extended to June 7, 2024. The dates for the document stating two different dates are correct. The first date reflects the updated leave of absence you have notified us in your anticipated return date of 7/15/24. The second date reflects when you initially notified the University on 4/30/24 of your leave before the extension. I have noted in your case that you have notified us of your leave being extended as of May 16, 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



From: Harout Gulessarian <chk90@icloud.com>
Sent: Friday, May 31, 2024 12:42 AM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulessarian

[See More from Harout Gulessarian](#)



SRA I Novitch
0622.JD.pdf

HG

Harout Gulessserian

Re: HRC0301037 LOA - Harout Gulessserian

To: Nguyen, Helen A., UCLAHealth-HR@mednet.ucla.edu,

Sent - iCloud June 6, 2024 at 5:57 PM

[Details](#)

Dear Helen,

As per my rights as an employee at UCLA, I would like to request in the entirety my complete employment file. Please provide any and all records from the start of my first interaction with UCLA, without limits including my internship in September 2021 up to the current date of this instant email; moreover, without limitations, insure to include any and all FMLA materials existing or otherwise filed under my name. Thank you in advance for your assistance; your time and efforts are deeply appreciated.

Also, please identify whether these files will be mailed electronically or physically, as I prefer both electronically and a physical set to be mailed to me within the next 5 working days, to the extent possible.

Furthermore, I would like to bring to your attention some matters of concern regarding my employment status and information forwarded to me thus far.

Firstly, regarding the document titled "SRA I Novitch 06/22" the "job description" materials furnished for my Healthcare Provider appears to be outdated; in fact, the document is referencing the year 2011 and the identifying name of another individual, not merely myself.

I kindly request an updated more accurate version, if available.

Additionally, I am confused by the completion of the designation form, as it is the first two pages of the document you recently sent me.

These pages request a healthcare provider certification, but it must be pointed out that I have prior duly provided this material to UCLA and UCLA seemingly approved this via the employee task portal, among other places.

That being said, I must highlight that I no longer have access to this necessary UCLA portal, despite UCLA's expectation for me to upload healthcare-related documents so as to comply with university policies. By design, this is seemingly placing me in an impossible position.

Furthermore, there appears written confirmation from the UCLA Health Employee Relations Department that the tasks requested and required of me by you are already completed.

Moreover, as a member of a collective bargaining unit through my union, please edify me; the issue is whether, I am entitled to utilize my accrued vacation and sick hours for FMLA purposes, as stipulated in my contract. I am in a hardship due to my FMLA, and given my Leave and Care issues, I find it perplexing as to why I am only seemingly now being offered this service, if at all, nearly a month into my FMLA leave, despite the fact it I seemingly remain eligible to use these hours for up to 8 weeks. Basically, I have not received any payment nor received guidance from UCLA on how to proceed to obtain payment during this challenging Healthcare leave period. Furthermore, I am looking forward to undertake additional efforts to comply with UCLA's demands for document uploading from me, but first please understand that I am removed from that system.

In conclusion, I kindly request your prompt attention to these matters and clarification on the process moving forward. Additionally, I would appreciate if you could specify whether the requested files will be provided electronically or physically, along with an estimated time frame pursuant to my sincere and needed request.

Thanks,
Harout Gulessserian



Nguyen, Helen A.

RE: HRC0301037 LOA - Harout Gulessarian
To: Harout Gulessarian

June 13, 2024 at 4:15 PM

Hi Harout,

As requested, attached is the electronic personnel file. As per your leave of absence, your leave is currently being worked on until I have received your paperwork. If you have submitted paperwork that is not already in your case files, please send them my way, so I can upload them to your case. As of today's date, you have not returned the designation document with the additional extension as requested. To stay in compliant as we work on your LOA case, please complete the designation document at your earliest. In the designation document, the document states you have available usage to use vacation and sick leave hours for your FMLA. In order to use your hours, you will need to communicate that you would like to use them to me. Please return the designation document for us to move to the next step.

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



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Thursday, June 6, 2024 5:57 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>; UCLA Health HR <UCLAHealth-HR@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulessarian

[See More from Harout Gulessarian](#)



Personnel
File_Gu...out.pdf

 Harout Gulessarian
Re: HRC0301037 LOA - Harout Gulessarian
To: Nguyen, Helen A.; Bcc: chr@chr.ucla.edu; Victoria Castaneda

June 11, 2024 at 4:56 PM

[Details](#)

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Dear Helen,

Thank you for your message. I would like to address a few points regarding my leave of absence documentation:

1. **Designation Document:** It's important to note that the designation document was signed by yourself, Helen, not by me. Additionally, there is nowhere for me to sign a document, nor was there a request or need for me to do so. I confirm that I agree with using my vacation and sick hours for FMLA, as indicated by your signature. Please ensure that my pay is retroactively adjusted to reflect this usage, and I receive the appropriate back pay.
2. **Document Submission:** Once again, it is imperative that UCLA receives NOTICE that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this remains a long standing event, and given UCLA is in the exclusive control of UCLA's electronic servers and thus the portals I submit, yet again, that all necessary paperwork has already been submitted and should be in my case files.
3. **Delay in Service:** It has been well over a month since I initiated this process, and I find it concerning that this service is only being offered now. I expect this matter to be expedited, investigated, and corrected.
4. **Access to the Portal:** Given that all necessary documents have been provided in a timely manner by me, Harout Gulessarian, I once again ask to regain access to upload information to the portal. It's not fair to expect document uploading when UCLA stripped away access, which is an impossible task to ask of an employee.
5. **Access to FMLA Paperwork:** Notice that I again am requesting any and all FMLA documents or electronic files of any kind, whether completed or not, to be presented to me in one file that is current up to the time of this email. I believe these are my rights and should not be denied, as such I am making a 2nd notice regarding my request.
6. **NOTICE** Regarding many and numerous prior requested by me, Harout Gulessarian, (06/06/24), but yet to be delivered to me; Harout Gulessarian, include, but are not limited to the following: all FMLA documents whether completed or not, complete employee file with the patent acknowledgment agreement including all pages not just the first page. Also, please update my email address to the correct email address: HGulessarian@mednet.ucla.edu

Once again, please ensure that my leave of absence is processed promptly, that I receive the back pay for up to 8 weeks of FMLA leave, and that the patent acknowledgment form has the second page attached to my employee files, updated and resent to me. I reserve all rights, make zero waivers, zero admissions, and I sincerely thank you for your time and assistance.

Thanks,
Harout Gulessarian

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

≡ Found in Inbox - iCloud Mailbox

 Nguyen, Helen A.
RE: HRC0301037 LOA - Harout Gulessarian
Tel: Harout Gulessarian

June 11, 2024 at 10:23 AM

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Hi Harout,

As of your leave from 4/24/24, you have 266.22 hours of vacation and sick leave accruals combined. You are covered to be paid from 4/24/24 to 6/7/24 with a total leave usage of 264.00 hours. Please confirm if you would like to use your leave balances to cover these dates mentioned (4/24/24 to 6/7/24). Thereafter, you will have extinguished your accrued leave. You will need to either apply for disability for the remainder of your leave or take the remaining time without pay. Can you please advise?

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



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, June 11, 2024 4:56 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulessarian

[See More from Harout Gulessarian](#)



From: Harout Gulessserian HKG90@icloud.com **Subject:** Re:HRC0301037LOA-HaroutGulessserian

Date: June 20, 2024 at 6:18 AM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu

Bcc: Victoria Castaneda vcastaneda@chr.ucla.edu, chr@chr.ucla.edu Dear Helen,

Thank you for your message. As my previous email had mentioned, yes, please use 264 of my vacation/sick hours accrued for FMLA back pay from the dates you mentioned. If this resource is exhausted, please continue the remaining of my leave as unpaid unless there are other options of remuneration. Additionally, please take all actions necessary and further advise me on whether I need to take any other steps to ensure my healthcare plans remain in effect during this time while I am actively using the healthcare plans on FMLA leave.

Next, while you addressed item #3 from my previous email, it seems your email does not address the remaining concerns which I raised and requested specific items and clarification on. This is the third time I am requesting any and all of my documents including FMLA complete/incomplete documents. Please see my prior email dated [06/11/24], which I am reattaching for easier clarification:

1 [“Dear Helen,

1 Thank you for your message. I would like to address a few points regarding my leave of absence documentation:

1 1. Designation Document: It's important to note that the designation document was signed by yourself, Helen, not by me. Additionally, there is nowhere for me to sign a document, nor was there a request or need for me to do so. I confirm that I agree with using my vacation and sick hours for FMLA, as indicated by your signature. Please ensure that my pay is retroactively adjusted to reflect this usage, and I receive the appropriate back pay.

1 2. Document Submission: Once again, it is imperative that UCLA receives NOTICE that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this remains a long standing event, and given UCLA is in the exclusive control of UCLA's electronic servers and thus the portals I submit, yet again, that all necessary paperwork has already been submitted and should be in my case files.

1 3. Delay in Service: It has been well over a month since I initiated this process, and I find it concerning that this service is only being offered now. I expect this matter to be expedited, investigated, and corrected.

1 4. Access to the Portal: Given that all necessary documents have been provided in a timely manner by me, Harout Gulessserian, I once again ask to regain access to upload information to the portal. It's not fair to expect document uploading when UCLA stripped away access, which is an impossible task to ask of an employee.

1 5. Access to FMLA Paperwork: Notice that I again am requesting any and all all FMLA documents or electronic files of any kind, whether completed or not, to be presented to me in one file that is current up

to the time of this email. I believe these are my rights and should not be denied, as such I am making a 2nd notice regarding my request.

1 6. NOTICE Regarding many and numerous prior requested by me; Harout Gulessarian,

1 6. NOTICE Regarding many and numerous prior requested by me; Harout Gulessarian, (06/06/24), but yet to be delivered to me; Harout Gulessarian, include, but are not limited to the following: all FMLA documents whether completed or not, complete employee file with the patent acknowledgment agreement including all pages not just the first page. Also, please update my email address to the correct email address: HGulessarian@mednet.UCLA.edu

1 Once again, please ensure that my leave of absence is processed promptly, that I receive the back pay for up to 8 weeks of FMLA leave, and that the patent acknowledgment form has the second page attached to my employee files, updated and resent to me; I reserve all rights, make zero waivers, zero admissions, and I sincerely thank you for your time and assistance.

1 Thanks, Harout Gulessarian ”].

It is imperative that I receive my entire employee HR file along with any related or actual FMLA documents. Please provide my complete employment file with the proper paperwork incorporated and updated, including a corrected email address, the patent acknowledgment form with all pages included, and all FMLA documentation whether incomplete or complete (including all ticket numbers opened under my name).

Now that the Designation Document is “complete,” can you please explain what was expected of me for the designation document to be complete?

Regarding document submission, it is imperative that UCLA receives notice again that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this long-standing issue and UCLA’s exclusive control of its electronic servers and portals, I assert that all necessary paperwork has already been submitted and should be in my case files.

Regarding access to the portal, since all necessary documents have been provided in a timely manner by me, Harout Gulessarian, I once again request to regain access to upload information to the portal. It is unreasonable to expect document uploading when UCLA has stripped away my access, making it an impossible task to ask of an employee.

Regarding access to FMLA paperwork, I am again requesting any and all FMLA documents or electronic files of any kind, whether completed or not, to be presented to me in one file that is current up to the time of this email. These are my rights and should not be denied. This is my third notice regarding this matter.

Notice regarding many and numerous prior requests by me, Harout Gulessarian (06/06/24, and 6/11/24), which have yet to be delivered to me, includes but is not limited to: all FMLA documents whether completed or not, a complete employee file with the patent acknowledgment agreement including all pages (not just the first page), and updating my email address to the correct one:
HGulessarian@mednet.UCLA.edu.

Once again, please ensure that my leave of absence is processed promptly, that I receive the back pay for the dates you mentioned for FMLA leave, and that the patent acknowledgment form has the second page attached to my employee files, along with an updated email address and resent to me at the earliest time possible.

I am grateful for your attention to these matters. Please note that I remain on FMLA leave and have been locked out of the UCLA healthcare portal, which I consider an act of retaliation. If the investigation

locked out of the UCLA healthcare portal, which I consider an act of retaliation. If the investigation requires any further assistance, please contact me via my personal email (hkg90@icloud.com), personal phone to leave a voicemail (818-621-8721), or by letter to my physical address (6403 Valmont st Tujunga ca 91042), as I do not have access to my UCLA work email, or access to further upload healthcare documents.

I reserve all rights, make zero waivers, zero admissions, and I sincerely thank you for your time and assistance.

Thanks,
Harout Gulessrian

On Jun 13, 2024, at 10:22, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

As of your leave from 4/24/24, you have 266.22 hours of vacation and sick leave accruals combined. You are covered to be paid from 4/24/24 to 6/7/24 with a total leave usage of 264.00 hours. Please confirm if you would like to use your leave balances to cover these dates mentioned (4/24/24 to 6/7/24). Thereafter, you will have extinguished your accrued leave. You will need to either apply for disability for the remainder of your leave or take the remaining time without pay. Can you please advise?

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

From: Harout Gulessrian <hkg90@icloud.com>
Sent: Tuesday, June 11, 2024 4:56 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> **Subject:** Re: HRC0301037
LOA - Harout Gulessrian

Dear Helen,

Thank you for your message. I would like to address a few points regarding my leave of absence documentation:

1. ***Designation Document***: It's important to note that the designation document was signed by yourself, Helen, not by me. Additionally, there is nowhere for me to sign a document, nor was there a request or need for me to do so. I confirm

to sign a document, nor was there a request or need for me to do so. I confirm that I agree with using my vacation and sick hours for FMLA, as indicated by your signature. Please ensure that my pay is retroactively adjusted to reflect this usage, and I receive the appropriate back pay.

2. ***Document Submission***: Once again, it is imperative that UCLA receives NOTICE that I do not have access to upload documents myself because UCLA has stripped me of my access. Given this remains a long standing event, and given UCLA is in the exclusive control of UCLA's electronic servers and thus the portals I submit, yet again, that all necessary paperwork has already been submitted and should be in my case files.

3. ***Delay in Service***: It has been well over a month since I initiated this process, and I find it concerning that this service is only being offered now. I expect this matter to be expedited, investigated, and corrected.

4. ***Access to the Portal***: Given that all necessary documents have been provided in a timely manner by me, Harout Gulessarian, I once again ask to regain access to upload information to the portal. It's not fair to expect document uploading when UCLA stripped away access, which is an impossible task to ask of an employee.

5. ***Access to FMLA Paperwork***: Notice that I again am requesting any and all all FMLA documents or electronic files of any kind, whether completed or not,

to be presented to me in one file that is current up to the time of this email. I believe these are my rights and should not be denied, as such I am making a 2nd notice regarding my request.

6. ***NOTICE*** Regarding many and numerous prior requested by me; Harout Gulessarian, (06/06/24), but yet to be delivered to me; Harout Gulessarian, include, but are not limited to the following: all FMLA documents whether completed or not, complete employee file with the patent acknowledgment agreement including all pages not just the first page. Also, please update my email address to the correct email address: HGulessarian@mednet.UCLA.edu

Once again, please ensure that my leave of absence is processed promptly, that I receive the back pay for up to 8 weeks of FMLA leave, and that the patent acknowledgment form has the second page attached to my employee files, updated and resent to me; I reserve all rights, make zero waivers, zero admissions, and I sincerely thank you for your time and assistance.

Thanks,

Thanks,
Harout Gulessrian

On Jun 10, 2024, at 16:13, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

As requested, attached is the electronic personnel file. As per your leave of absence, your leave is currently being worked on until I have received your paperwork. If you have submitted paperwork that is not already in your case files, please send them my way, so I can upload them to your case. As of today's date, you have not returned the designation document with the additional extension as requested. To stay in compliant as we work on your LOA case, please complete the designation document at your earliest. In the designation document, the document states you have available usage to use vacation and sick leave hours for your FMLA. In order to use your hours, you will need to communicate that you would like to use them to me. Please return the designation document for us to move to the next step.

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

From: Harout Gulessrian <hkg90@icloud.com>
Sent: Thursday, June 6, 2024 5:57 PM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>; UCLA Health HR <UCLAHealth-HR@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulessrian

Dear Helen,

As per my rights as an employee at UCLA, I would like to request in the entirety my complete employment file. Please provide any and all records from the start of my first interaction with UCLA, without limits including my internship in September 2021 up to the current date of this instant email; moreover, without limitations, insure to include any and all FMLA materials existing or otherwise filed under my name. Thank you in advance for your assistance; your time and efforts are deeply appreciated.

Also, please identify whether these files will be mailed electronically or physically, as I prefer both electronically and a physical set to be mailed to me within the next 5 working days, to the extent possible.

Furthermore, I would like to bring to your attention some matters of concern regarding my employment status and information forwarded to me thus far.

Firstly, regarding the document titled "SRA I Novitch 06/22" the "job description" materials furnished for my Healthcare Provider appears to be outdated; in fact, the document is referencing the year 2011 and the identifying name of another individual, not merely myself.

I kindly request an updated more accurate version, if available.

Additionally, I am confused by the completion of the designation form, as it is the first two pages of the document you recently sent me.

These pages request a healthcare provider certification, but it must be pointed out that I have prior duly provided this material to UCLA and UCLA seemingly approved this via the employee task portal, among other places.

That being said, I must highlight that I no longer have access to this necessary UCLA portal, despite UCLA's expectation for me to upload healthcare-related documents so as to comply with university policies. By design, this is seemingly placing me in an impossible position.

Furthermore, there appears written confirmation from the UCLA Health Employee Relations Department that the tasks requested and required of me by you are already completed.

Moreover, as a member of a collective bargaining unit through my union, please edify me; the issue is whether, I am entitled to utilize my accrued vacation and sick hours for FMLA purposes, as stipulated in my contract. I am in a hardship due to my FMLA, and given my Leave and Care issues, I find it perplexing as to why I am only seemingly now being offered this service, if at all, nearly a month into my FMLA leave, despite the fact it I seemingly remain eligible to use these hours for up to 8 weeks. Basically, I have not

received any payment nor received guidance from UCLA on how to proceed to obtain payment during this challenging Healthcare leave period. Furthermore, I am looking forward to undertake additional efforts to comply with UCLA's demands for document uploading from me, but first please understand that I am removed from that system.

In conclusion, I kindly request your prompt attention to these matters and clarification on the process moving forward. Additionally, I would appreciate if you could specify whether the requested files will be provided electronically or physically, along with an estimated time frame pursuant to my sincere and needed request.

needed request. Thanks,

Harout Gulessarian

On May 31, 2024, at 12:47, Nguyen, Helen A.

<image001.png>

<HelenANguyen@mednet.ucla.edu> wrote: Hi Harout,

See attached your job description to provide to your Healthcare Provider. Your request to extend the designation document have been extended to June 7, 2024. The dates for the document stating two different dates are correct. The first date reflects the updated leave of absence you have notified us in your anticipated return date of 7/15/24. The second date reflects when you initially notified the University on 4/30/24 of your leave before the extension. I have noted in your case that you have notified us of your leave being extended as of May 16, 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

From: Harout Gulessarian <hkg90@icloud.com>

Sent: Friday, May 31, 2024 12:42 AM

To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> **Subject:** Re: HRC0301037
LOA - Harout Gulessarian

Hello Helen,

On 05/28/2024 I received confirmation from Employee Relations Management that my FML was appropriately processed by you as the new leave analyst and all should be in order at this time.

Regarding the document there appear to some issues:

First, it appears my Healthcare Providers indicated that they need to see the attached "job description", The form states "A

need to see the attached "job description", The form states "A job description listing the essential functions of your position is attached to the Return to Work Certification" but the Healthcare Providers indicated that in fact no job description listing essential functions is on the document. Can you kindly attach the job description for the Healthcare Providers purposes and extend the 5/31/24 date due to the Healthcare providers earliest availability.

Second, the part of the document stating: "Document For block leaves: Start date: Anticipated End Date: Return to Work Date:" The dates there appear inconsistent from the part of the document that references an FML end date of "May 15, 2024." Instead, UCLA Health HR and LOA and Employee relations have received the updated note stating a return date of July 15 2024.

Finally, the portion of the document indicates the following: "Once we obtain the information from you as specified above, we will inform you, within 5 business days, whether your leave will be designated as FML and count towards your FML leave entitlement. Meanwhile, WE HAVE PROVISIONALLY DESIGNATED YOUR LEAVE AS FML. If you have any questions, please do not hesitate to contact:" I would like to call your attention to two matters. Firstly, the Healthcare Certification regarding the extension of the initial approved FML was both timely forwarded to my assigned leave analyst on the LOA system Valentino and his Co Leave Analyst Cassandra and appears approved based on correspondence of UCLA Employee Relations Management; moreover, more importantly the Healthcare Certification was further evidenced and uploaded in the UCLA LOA system on 05/03/2024 and it appears the matters of extension (uploaded 5/14/2024) approval are already approved by UCLA.

Thank you,
Harout Gulessarian

On May 29, 2024, at 16:51, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

I am following up with you on your Leave request. As of today's date, I have not received your completed designation form for your leave of absence. Please note that I will need your

absence. Please note that I will need your documents to process your leave, please return the documents by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

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 <image001.png>

From: Nguyen, Helen A.
Sent: Friday, May 24, 2024 2:03 PM
To: Harout Gulessarian <hkg90@icloud.com> **Subject:** HRC0301037 LOA - Harout Gulessarian

Hi Harout,

My name is Helen and I'm the HR Analyst for Neurobiology. I am your official Leave Analyst while you are taking time off. I am following up on your LOA case #HRC0301037. You filed for leave of absence from April 24, 2024 to May 15, 2024 (now extended to July 15, 2024). I have attached the Leave form that you will need to fill out and return back to me by May 31, 2024. If you have any questions, please don't hesitate to reach back out to me.

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 <image001.png>

UCLA HEALTH SCIENCES IMPORTANT WARNING: This email (and any attachments) is only intended for the use of the person or entity to which it is addressed, and may

the person or entity to which it is addressed, and may contain information that is privileged and confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Unauthorized redisclosure or failure to maintain confidentiality may subject you to federal and state

penalties. If you are not the intended recipient, please immediately notify us by return email, and delete this message from your computer.

<Lacking Documentation for Leave - LOA_Gulesserian, Harout.pdf>
<Designation_Document_for_Own_Illnes.pdf>

 Nguyen, Helen A. June 20, 2024 at 9:16 AM
RE: HRC0301037 LOA - Harout Gulesserian
To: Harout Gulesserian

Hi Harout,

Per your confirmation, I have processed your FMLA leave paid to you from 4/24/24 to 6/7/24 with a total of 264.00 hours of vacation and sick leave with a remainder of 2.22 hours in your leave balance. I have attached the following files as you have requested. Please see attached:

- State Oath and Patent Acknowledgement Form page 2
- LOA Files

If you would like assistance to upload your files to your cases, please reach out to the LOA Team at: loateam@mednet.ucla.edu.

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

UCLA Health

From: Harout Gulesserian <chkg90@icloud.com>
Sent: Thursday, June 20, 2024 8:18 AM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: HRC0301037 LOA - Harout Gulesserian

[See More from Harout Gulesserian](#)

 
[Designation.pdf](#) [Designation_Documen...es.pdf](#)

HN Nguyen, Helen A.
Leave of Absence Return to Work Notice Reminder
Get new messages in all accounts

Siri found new contact info: Helen A. Nguyen helenanguyen@mednet.ucla.edu add...
Hi Harout,

This is a gentle reminder that I have not received an updated Doctor's Note indicating your Return-to-Work date since 7/15/24. Your FMLA leave is currently unapproved. Base on the tentative Doctor's Note I have noting "3 weeks" based on 7/15/24, which lines up to Monday, August 5, 2024. Please remember you need a Return-to-Work Doctor's Note clearance to return to work. If you are extending your leave of absence, please have a detailed Doctor's Note with a set future date (specific date) as well as an updated Doctor's note to cover your unapproved leave onwards from 07/15/24.

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

UCLA Health

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

From: Harout Gulessserian HKG90@icloud.com
Subject: Re: Leave of Absence Return to Work Notice Reminder

Date: August3,2024at4:59PM
To: Nguyen, Helen A. HelenANguyen@mednet.ucla.edu

Bcc: chr@chr.ucla.edu, LOA Team LOAteam@mednet.ucla.edu

Dear Helen,

I am writing to address the recent issues regarding my FMLA leave and the necessary documentation.

On July 16, 2024, I provided an updated Doctor's Note (see below).

HG

Harout Gulessserian

Re: ACTION REQUIRED - Return to Work - Harout Gulessserian - HRC0301037
To: Nguyen, Helen A., Bcc: chr@chr.ucla.edu

Sent - iCloud July 16, 2024 at 7:04 AM

[Details](#)

Hi Helen,

Per your request, provided below is an updated healthcare note. I don't have uploading access again, so please ensure this is uploaded to my file.

If possible, will you send me an update once you actually upload the file to my case? I'm doing everything I can to stay in full compliance with the procedures, rules, and policies set forth by the university. Thank you for your patience.



EB PSYCHOTHERAPY

2001 N. Normandie Ave, Ste 206, Los Angeles, CA 90004

July 16th, 2024.

To Whom It May Concern:

Mr. Harout Gulessserian is our patient, and has been under our care at EB PSYCHOTHERAPY since 4/14/2024. Mr. Gulessserian is presently actively engaged in treatment to deal with his mental health symptoms. Due to the nature and intensity of his symptoms and the continued functional limitations imposed on him by his mental health diagnosis, Mr. Gulessserian has been advised to extend his leave from his work duties for a period of 3 weeks, so he can continue to concentrate on his treatment with the goal of restoring his overall mental health.

For anything further, please contact us at Elene@ebpsychotherapy.com or at 424 - 248 - 7727.

Sincerely,



Dr. Elena Segnani (PhD)
Clinical Psychologist
PSY2054

EB Psychotherapy
Clinical Director

Kind regards,
Harout

To which you responded back confirming receipt of the note:

HN Nguyen, Helen A.
RE: ACTION REQUIRED - Return to Work - Harout Gulessarian - HRC0301037
To: Harout Gulessarian

Siri found new contact info Helen A. Nguyen HelenANguyen@mednet.ucla.edu

Hi Harout,

Thank you for providing the doctor's note. I have uploaded this to your case. I would like to ask for clarification from the doctor in terms of your anticipated return to work date following the guideline of "3 weeks". Please advise at your earliest so I can update the new anticipated return to work date on your case.

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*



From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, July 16, 2024 7:05 AM
To: Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu>
Subject: Re: ACTION REQUIRED - Return to Work - Harout Gulessarian - HRC0301037

Hi Helen,

Per your request, provided below is an updated healthcare note. I don't have uploading access again, so please ensure this is uploaded to my file.

If possible, will you send me an update once you actually upload the file to my case? I'm doing everything I can to stay in full compliance with the procedures, rules, and policies set forth by the university. Thank you for attending to these matters.

Despite this, on July 23, 2024, you erroneously stated that I had not submitted the required documentation for my healthcare leave extension. You subsequently requested an updated letter by July 24, 2024 (see below).



Nguyen, Helen A.

July 23, 2024 at 2:49 PM

RE: ACTION REQUIRED - Lack of Documentation - Harout Gulessarian - HRC0301037
To: Harout Gulessarian



Hi Harout,

The last medical note we received from you covered you through [7/15/24].

As of 07-23-2024, I have not received an updated returned to work date from your Doctor's Note.

We must receive an updated work status note by 7/24/24. The doctor's note must include a Return to Work date.

Your Leave of Absence is considered unauthorized until we confirm receipt of an updated work status note by 7/24/24.

Please upload this documentation by completing the task assigned to you in Employee Experience Center: [HERE](#)

You can also see the task under Employee Experience Center > My To-dos

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



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

The following day again you reached out asking for an updated doctors note (see below).

Nguyen, Helen A.
RE: ACTION REQUIRED - Lack of Documentation - Harout Gulessarian - HRC0301037
To: Harout Gulessarian

Inbox - iCloud July 24, 2024 at 5:02 AM



Hi Harout,

I'm reaching out to follow up on your updated Doctor's note for your Leave of Absence. As of 7/24/24, I have not received a response with the Doctor's note indicating a return-to-work date for us. We must receive an updated work status note by 7/24/24. The doctor's note must include a Return-to-Work date. Your Leave of Absence is considered unauthorized until we confirm receipt of an updated work status note by 7/24/24.

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



I respectfully responded back (See below) stating my compliance with all the requirements required by me and despite my efforts to constantly remain in compliance with the Universities rules, polices, and regulations I have not had access to my portal for uploading healthcare documents since someone from UCLA removed my document uploading privileges. However, the above email suggests that I should have been able to upload these documents to the Employee Experience Center portal the entire time during my FMLA leave. Despite you being fully aware of this issue, the issue was never addressed in any of your communications.

Sent - iCloud July 24, 2024 at 5:05 PM
Harout Gulessarian
Re: ACTION REQUIRED - Lack of Documentation - Harout Gulessarian - HRC0301037
To: Nguyen, Helen A., Bcc: chr@chr.ucla.edu, LOA Team
[Details](#)

Hi Helen,

This email serves as notice that there is a deliberate or negligent misrepresentation of facts within UCLA's system that aims to violate my FMLA rights.

I have complied with all necessary FMLA Healthcare Certification requirements and have provided the required documentation. Despite the evidence of timely delivery of Healthcare Certification by myself to UCLA representatives, representatives from UCLA are making statements that are completely inconsistent with the truth. If my access to upload documents were reinstated as your email suggests, these documents would already be in the system and would not be used against me. They now have been sent via certified mail.

To address your email:

* I submitted my documents for the extension, which you confirmed receiving and uploading on 7/16/2024. Since I have been stripped of my access to upload these documents (well over a month and half now and to which you are/were fully aware of), you are responsible for uploading them to my portal. If there was any negligence in uploading the document, it is not my fault and should not be used against me.

* The extension note indicated a three-week period rather than a specific date, yet you now claim you never received the initial extension note. The last medical note you received covered me through 07/15/24 plus an additional three weeks, as stated in the doctor's note. As of 07/23/2024, you claim not to have received an updated return-to-work date from my doctor. However, I have provided all necessary documentation as required. You then requested an updated note with specific return date at my earliest convenience. See your response below.

On 07/16/2024, in email you stated: "Thank you for providing the doctor's note. I have uploaded this to your case. I would like to ask for clarification from the doctor in terms of your anticipated to return to work date following the guideline of '3 weeks'. Please advise at your earliest so I can update the new anticipated return to work date on your case."

This miscommunication must be rectified immediately to ensure my rights under FMLA are upheld. All of my healthcare documents were sent to you via email or uploaded to the portal by myself initially, and now also sent to you via certified mail. Please acknowledge receipt of my documents and confirm my extended leave status as previously indicated by email.

Now, if my FMLA is past the 12 week point do I need to fill out any other documentation to keep myself in full compliance with the universities rules and policies? Please kindly let me know so I can continue complying with the rules and policies of the university, thanks.

Kind regards,
Harout Gulessarian

Consequently, I sent all relevant healthcare documentation via certified mail to 10833 Le Conte Ave, Box 951763, UCLA Department of Neurobiology, 73-235 CHS, specifically addressed to you.

This mail was received by UCLA on July 30, 2024, as confirmed by the certified receipt stamped and received by UCLA. The documents included all of my healthcare/HIPPA protected documents.

A U.S. Postal Service Certified Mail Receipt. The top section is titled "U.S. Postal Service CERTIFIED MAIL RECEIPT" with "Delivery Mail Only". Below is a table for "Local Recipients (Up To \$100)". The recipient is listed as "Mr. & Mrs. J. S. BROWN" with address "123 Main St., Box 4567, Anytown, PA 19801". The amount "\$10.00" is circled in red. A large red circle with "PAID" is stamped across the middle. The bottom section shows "Delivery Total" as "\$10.00" and "Delivery Details" for "Delivery Date" (10/10/2004), "Delivery Time" (10:00 AM), "Delivery Method" (Delivery by Air Mail), and "Delivery Route" (PA 4000 0000 0000 0000). There is also a handwritten note "PAID" next to the delivery route.





Now, to resolve any further concerns and ensure compliance, I have also resent the same documents to the same address via certified mail. And, because you never granted me access to the employee experience portal to upload these documents, I am also providing for your immediate reference an attached copy below of the updated Doctor's Note.



July 10th, 2024

To Whom It May Concern,

Mr Harout Gulessarian is our patient, and has been under our care at EB Psychotherapy since April 2023. Mr Gulessarian is presently actively engaged in treatment to deal with his mental health symptoms. Due to the nature and intensity of his symptoms and the continued functional impairment imposed on him by his mental health diagnosis, Mr Gulessarian has been unable to attend his leave from work due to a period of 8 weeks, specifically until August 1st, as he continues to concentrate on his treatment with the goal of restoring his overall mental health.

For anything further, please contact us at info@ebpsychotherapy.com or at 424-268-1777.

Sincerely,

Dr. Kiana Bagourian (PhD)
Clinical Psychologist,
Psychotherapist

EB Psychotherapy
Clinical Director

Please confirm receipt of these documents and update the status of my FMLA leave accordingly. Prompt resolution of this matter is essential to avoid any further discrepancies.

Thank you for your immediate attention to this issue.

Best regards, Harout Gulesserian

On Aug 2, 2024, at 12:29, Nguyen, Helen A. <HelenANguyen@mednet.ucla.edu> wrote:

Hi Harout,

This is a gentle reminder that I have not received an updated Doctor's Note indicating your Return-to-Work date since 7/15/24. Your FMLA leave is currently unapproved. Based on the tentative Doctor's Note I have noting "3 weeks" based on 7/15/24, which lines up to Monday, August 5, 2024. Please remember you need a Return-to-Work Doctor's Note clearance to return to work. If you are extending your leave of absence, please have a detailed Doctor's Note with a set future date (specific date) as well as an updated Doctor's note to cover your unapproved leave onwards from 07/15/24.

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 <image001.png>



The screenshot shows an iPhone Mail inbox with one unread email from "Nguyen, Helen A." titled "RE: Leave of Absence Return to Work Notice Reminder". The email was sent on August 5, 2024, at 11:48 AM. The message body contains a Siri notification about finding new contact info for Helen A. Nguyen. The signature at the bottom of the email includes the UCLA Health logo.

Hi Harout,

I have received your updated Doctor's note with a clear specific anticipated to return to work as of 8/6/24. I have updated the information in both your LOA case as well as UC Path. As a reminder, in order to return to work, you will need to complete the "Return to Work" certification document as well as providing a doctor's note clearing you to return to work. I have attached the Return-to-Work certification document for you. Once I have received and reviewed your documentations, I will be able to process your return to work in a timely manner.

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



PAY ADVICE STATEMENT																																																																																											
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Bennett Asks Gulessserian if he is sure that he used the novel molecule, also states “quite a bit to be examined if we did want to tout this as a new agent to promote organoid formation”



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.



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!

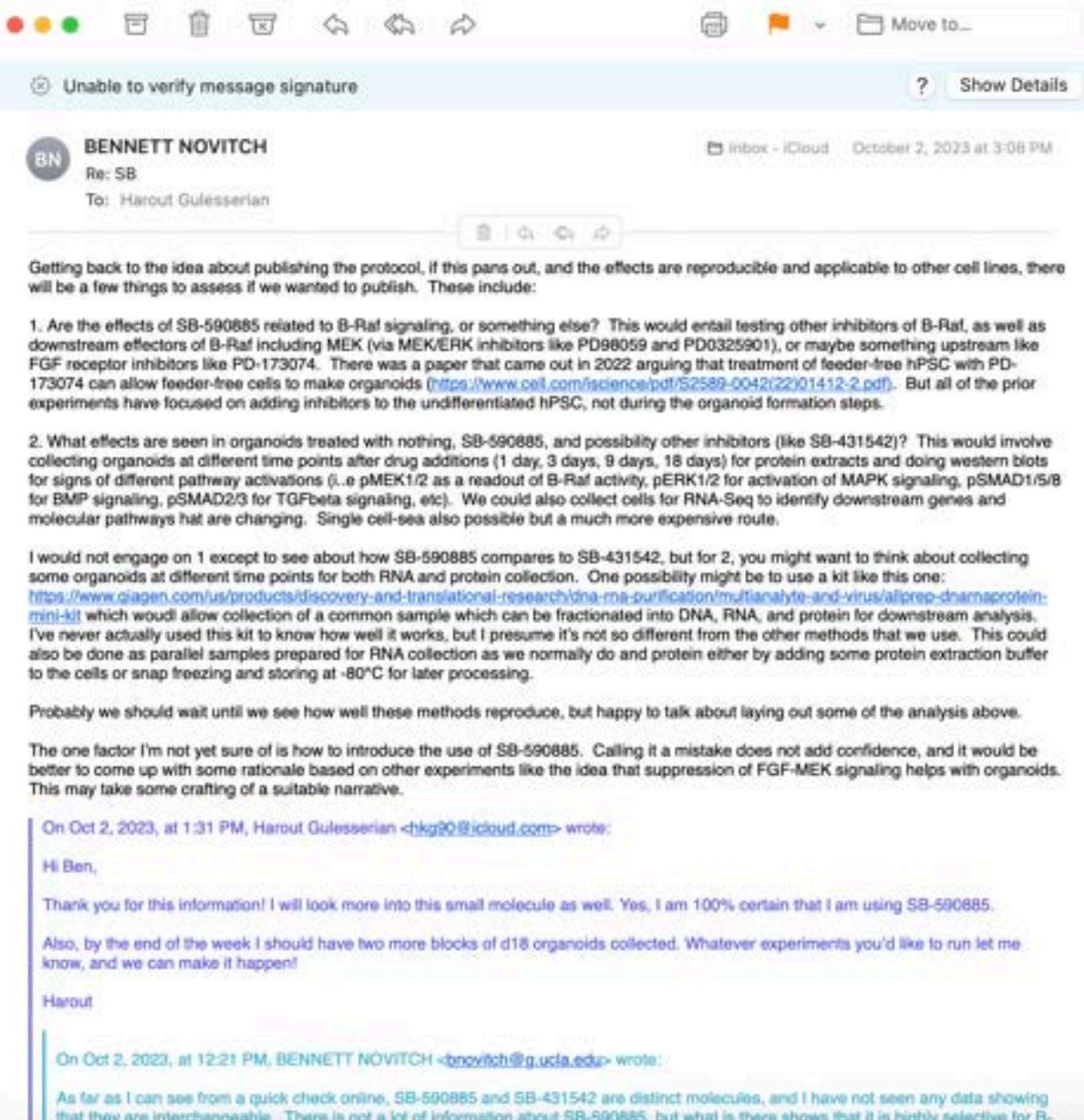
Harout

On Oct 2, 2023, at 12:21 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote:

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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.



Mark Lucas making False statements about Gulessarian's healthcare documentation.

ML Lucas, Mark
Leave
To: Harout Gulessarian

Move to... Edit - Cloud May 15, 2024 at 10:42 AM

Dear Harout,

Your request for use of FMLA has not been approved as yet. We wanted to remind you that you were provided with 15 days (through May 15, 2024) to submit medical certification. Your absence from work is currently unauthorized and unexcused. Can you please contact us to provide and/or reply to the LOAN system e-mail that was sent on April 30, 2024 from UCLA Health? Thanking you in advance.

Best,
Mark

UCLA HEALTH SCIENCES IMPORTANT WARNING: This email (and any attachments) is only intended for the use of the person or entity to which it is addressed, and may contain information that is privileged and confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Unauthorized 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.

HD Harout Gulessarian
Re: Leave
To: Lucas, Mark

Move to... Edit - Cloud May 16, 2024 at 8:06 AM

Dear Mark,

Thank you for your very kind concerns while I remain on FMLA leave; all your kindness is deeply appreciated.

That being said, I must reserve all rights given my understanding, and directly per "UCLAHealthHR" & "LOA team," along with my "Leave Analyst" at my initial FMLA request was in fact arguably approved.

Moreover, there's consistent reinforcement per "UCLA Health" that LOA team in fact received my requisite Healthcare Documentation more than ten [10] days ago and nothing inconsistent was noted in my direction the entire time by: "UCLAHealthHR," & "LOA team," or "UCLA Health" for that matter.

That being said, there's an objection in order, as I am at a loss when you state that my absence from work is currently unauthorized and unexcused.

In fact, in reality I timely complied and continue to comply with all instructions per "UCLAHealthHR" & "LOA team" and anything else from the person who LOA Team indicated in writing to me in/was my assigned "Leave Analyst," during all relevant time periods in your email dated 05/14/2024.

Moreover, many attempts were, and are currently being made, timely reaching out and attempting to deliver any and all required Healthcare Documentation for past or present instant extended FMLA leave matters directly to whoever the LOA team specifically indicates to me in my assigned "Leave Analyst."

Also, regarding the "LOAN system" there appears there is nothing required for "LOAN system" under the instructions of "LOA Team" or any instruction from "UCLAHealth," or for that matter from the person "LOA Team" assigned to be my "Leave Analyst."

Therefore, I am at complete and utter loss as to what exactly is going on, but please be assured that from my end there remains dedicated and good faith attempts to comply with all requirements as indicated to me from "UCLAHealthHR" & "LOA team" or the person who LOA Team indicates to me in/was my Leave Analyst.

Seemingly, once the person that LOA Team indicated was my designated Leave Analyst (and whoever that may end up being going forward) as to my new FMLA extension date going forward, I believe that once LOA Team and my appointed Leave Analyst work things out as between themselves, then they will likely inform your side and they will likely inform my side of any updates or supplemental requirements, or any other matters, as well.

Moreover what is even more bizarre is that if my absence from work was not approved, not authorized, or unexcused, then "UCLAHealthHR" & "LOA team" and the person they assigned to be my "Leave Analyst" had so many and numerous opportunities to inform me that my absence from work was not approved, not authorized, or unexcused or at least make objective express demands of my side to inform me if my absence was not approved, not authorized, unexcused or to ask me to provide any other necessary supplemental documentation with a hypothetical declared written and expected return date/dates as designated expressly per the directions of my assigned Leave Analyst, but instead NOTHING of the sort CAME to my side, neither from the "Leave Analyst" nor from "LOA Team" nor from "UCLA Health HR."

Moreover, in the event there were any issues as you indicate, then my assigned "Leave Analyst" could have granted me a reasonable amount of additional time if I hypothetically was unable to obtain Healthcare Certification in spite of (let's say my diligent, good faith efforts). But no such dialogue or inquiry was ever made.

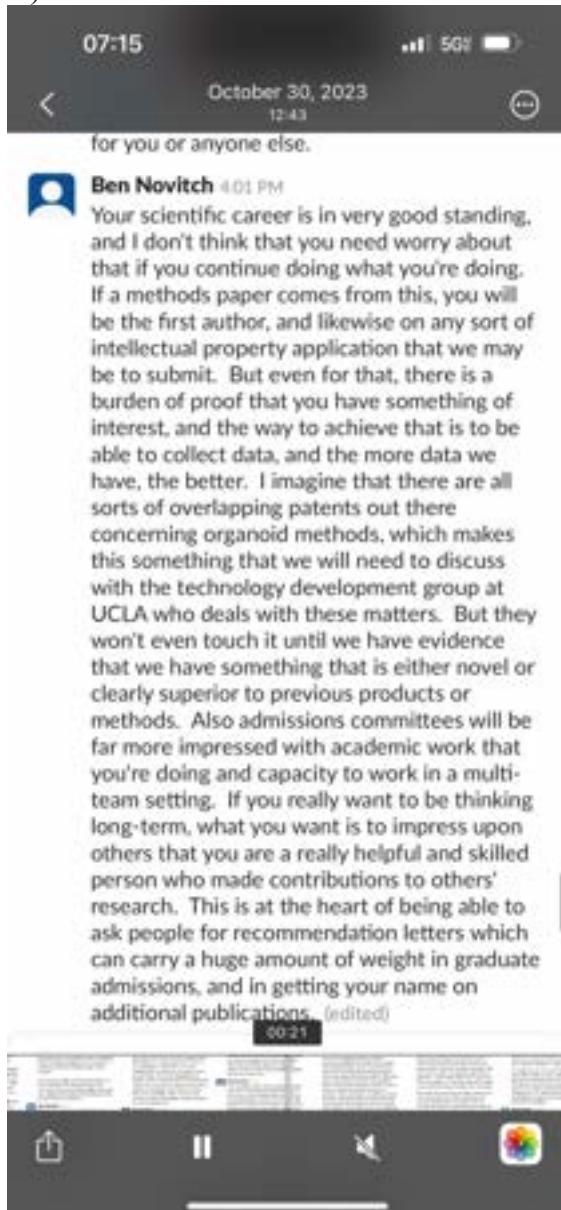
Therefore, I am at a complete loss and at the complete mercy of UCLA Health HR & LOA Team & my assigned Leave Analyst(s) because this is the type of thing that does not happen less a mistake somewhere solely in LOA Teams control and most importantly I can submit that I did not contribute to the cause of such mistakes.

Thank you for all your very kind concerns while I shall remain unavailable until at least 15 July, 2024 due to my FMLA Leave extension.

Thanks, Harout.

Novitch to Gulessarian: Share the protocol with his consortium coworkers in order for Gulessarian to get letters of Recommendation of course prior to TDG safeguarding the IP
(A). Novitch in this message indicates UCLA owns everything we do that both of us would get a cut out of the patent should it commercialize and months later claims that he does not have to report through TDG but via NIH the tax peoples money as Novitch called it (C).
Novitch also made misleading statements about royalties as here (A) he states both of us will be getting royalties and later submits that only PI's get a cut (B).

A)



07:15

5G

October 30, 2023

12:43



team setting. If you really want to be thinking long-term, what you want is to impress upon others that you are a really helpful and skilled person who made contributions to others' research. This is at the heart of being able to ask people for recommendation letters which can carry a huge amount of weight in graduate admissions, and in getting your name on additional publications. (edited)

Regarding the new urgency with the CIRM line, this is about trying to push the project past one of the first milestones which is in cell line selection. The group wants to choose a cell line that we like and commit to it so that we're not talking about it going into the new year. Aparna's lab has previously used the CIRM line that you have (though we need to confirm which one you have), and found that it was good in their hands for making organoids. We just want to make sure that we agree that it's good too. The second CIRM line to be test is more as a backup, in case we were to find that one of these two lines is better than the other.

If it works for you to do the initial making and have others help out with maintenance or processing thereafter, that's fine with me. Though we need to ensure that you're able to pass on the magic to others too. I'm most wanting it for our lab first, but the proof of a good protocol comes from others being able to replicate the findings.



Harout K G 7:17 PM

I greatly appreciate 00:26 - feedback recording



07:16

5G

October 30, 2023

12:43



your guidance throughout the entirety of this process! More to come!!!! :)



Ben Novitch 3:55 PM

Hi Harout, sending around a "legal" document can become thorny, so I'm not keen on going that route, as I fear it might spiral into having it reviewed by legal professionals, etc which I don't have the time or money to engage with. We do have to accept some level of trust in our colleagues in the lab and our local collaborators that they are not going to end run anything. And not do disappoint you further, UCLA ultimately owns everything that comes from our research though we can get a cut should anything come from any of this. More than anything, I don't want to have concerns about these things impede progress for you or anyone else.



Ben Novitch 4:01 PM

Your scientific career is in very good standing, and I don't think that you need worry about that if you continue doing what you're doing. If a methods paper comes from this, you will be the first author, and likewise on any sort of intellectual property application that we may be to submit. But even for that, there is a burden of proof that you have something of interest, and the way to achieve that is to be able to collect data, and the more data we have, the better. I imagine that there are all sorts of overlapping patents out there concerning organoid methods, which makes

00:00



B) From: Harout Gulessarian hkg90@icloud.com **Subject:** Re: Request to meet

Date: January 22, 2024 at 8:53 AM
To: BENNETT NOVITCH bnovitch@g.ucla.edu

Hello Ben,

I am sorry to hear you are under I wish you a speedy recovery and hope to see you in lab very soon. Unfortunately, I am also feeling a bit under myself and would not mind if we meet later in the week. I may also need to step away from lab today after making Eric's organoids to take care of myself.

I am extremely grateful to you for making sure I get my credit for discovering the usage of the molecule & creating the protocol; perhaps you can now understand how much more meaningful that was when you said that, especially given the ongoing anxiety from being marginalized, as members of the lab are continuously non-inclusive making sure that I am denied meaningful opportunities on projects such as the HIV research. Therefore, I am grateful for your reassurance that there will be no missappropriation of my creations, especially from people who have maintained a pattern and practice of marginalization and non-inclusiveness at me.

Regarding any information, including the formula, or method of my technique, I believe that the protocol I created, even now as it stands, with nothing more added to the formula/recipe, derives at least some independent economic value [whether actual or potential] from not being generally known to other persons who can obtain economic value from its disclosure [whether now or at a later time].

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.

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.

Certainly I can appreciate your past efforts with TDG regarding +4G, but given TDG handles matters on a case by case system and given laws, rules, and policies are frequently amended and get updated regularly, perhaps I can propose that maybe TDG is best suited to insure we are moving forward with UCLA best practices whatever those may be.

I think that we should further discuss the HIV project in person, along with focusing on reconciliation and somehow becoming more inclusive & cohesive as a group. I believe it's important for all of us in lab to feel inclusive, and welcomed at the end of the day.

I 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.

Hope you feel better soon, Harout

On Jan 20, 2024, at 3:04 PM, BENNETT NOVITCH <bnovitch@g.ucla.edu> wrote: Hi Harout,

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.

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 invention report. You should be aware that the bar for UCLA supporting such efforts is higher than you might think. I 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 organoid and stem cell differentiation methods, so there is a lot of navigation that would be required in demonstrating how this finding is distinct from others. **You also need to know that any "inventions" that we make at 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.

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 mechanisms 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.

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 not 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.

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 Adrian, and I hope 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 bringing things to completion. I am going to call for a group meeting with Oliver's lab in the next week or two so that we can have a catch-up and go over the assignments again.

Returning to the start of my response, I have time open on Monday from 8:30-10, and 2-3:30. We were slated 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

On Jan 20, 2024, at 6:43 AM, Harout Gulessarian <hkg90@icloud.com> wrote: Hi Ben,

Thank you for verbally memorializing to Cendi and others in lab on Wednesday that only you and I will be credited with my discovery of using SB590885 for cerebral organoid formation, along with the unique cerebral organoid protocol I created.

Moreover, thank you for reassuring me that the RNAseq will be initiated with timelines to be announced at our next meeting.

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 old, I have been marginalized, and am not sure why I am being excluded. I have repeatedly offered to do anything necessary to further the research.

With respect to my discovery/protocol: Granted that I am willing, ready, and able to draft, compose, and disseminate published material for the group and any others who plan to be incorporated in advancing my discovery. I think before doing so we should further focus as to the requirements of UCLA Technology Development Group emphasizes to "refrain from publishing your work before you have an opportunity to discuss it with someone from TDG".

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.

I look forward to discussing these matters with you in person. As far as availability for a meeting, I will be in lab today, Sunday, and Monday. Whatever time works best for you to meet also works best for me.

I look forward to hearing from you. Harout

C)

④ Unable to verify message signature

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Show Details

BENNETT NOVITCH

Re: Delays

To: Hansut Guleeserian; Cc: Mark Lucas

April 15, 2014 at 8:58 AM

Details

Siri found new contact info: Bennett Novitch bennitch@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 21. 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
1650 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: bennitch@ucla.edu
Web: <http://novitchlab.com>

See More from Hansut Guleeserian