

***Supplemental Submission of Evidence & Evidentiary
Exhibit(s) # 1 to 37 – Whistleblower Retaliation
Complaint***

Evidence & Evidentiary exhibits below is relevant for motive, intent, knowledge, patterns of human behavior and without limitations, as to specifically (identity) - - identifying and connecting particular consortium members, in a role as potential additional Respondents for the investigation beyond merely Bennett Novitch as the sole Respondent responsible for this misconduct.

Incorporated by reference, as if fully set forth herein, are all materials that have been delivered to UCLA, including but not limited to those sent by certified mail, email correspondence, and any supplemental submissions previously acknowledged or referenced in related communications or responses related to the common scheme without limitations for knowledge, intent, motive, and pattern of human behavior among other evidentiary and factual reasons without limits.

I, Harout Gulessarian, make no waivers or admissions and expressly reserve all rights, without limitation, to amend, revoke, modify, or supplement any and all provisions of this complaint, particularly as additional evidence is discovered or becomes available.

Harout K. Gulessarian

Date of original Submission: May 5th, 2025

Supplemented May 23, 2025

Submitted by:

Harout K. Gulessarian

Date of Submission: May 23, 2025

Transmitted via email and certified mail

This complaint is based on, but not limited to, the following causes of action and protected classes without limitations:

1. Whistleblower
2. Whistleblower Retaliation
3. Discrimination on the Basis of without limitations:
 - o Race
 - o Ancestry
 - o National Origin
 - o Physical Disability
 - o Mental Disability
 - o Genetic information
 - o Medical or Healthcare-Related Conditions
 - o FMLA (Family and Medical Leave Act) Rights
 - o FMLA Retaliation
 - o Whistleblower
 - o Reasonable Healthcare Accommodations
 - o Reasonable Healthcare Accommodation Retaliation
 - o Wage and hour retaliation and discrimination
- + the discrimination, harassment, and retaliation thereof
4. The Exercise of Rights Under Federal and State Laws without limits
5. Any Other Protected Class or Claim as Stated in the Complaints or Relevant Legal Framework without limits

The complainant, Gulessarian, makes no admissions and expressly reserves all rights. This document does not constitute a waiver of any claims, causes of action, or legal theories. The complainant reserves the right to amend, supplement, modify, clarify, or withdraw any part of this filing as more evidence or circumstances arise.

Evidence & Evidentiary Exhibit 1 – Intentional lockout design outlined below, due to timesheet being “Read Only” while none of the hours are filled in prior to the timesheet due date

 **Harout Gulessarian** To: Shelly Frohrip >

Re: Shelly/Harout

Dear Shelly,

I hope you're well. I am writing to inform you that I have submitted my application for the lateral transfer for the interim period, with the understanding that I would be transferred to another lab if the current lab I am being transferred to (Dr. Paul Micevych's lab) shuts down due to retirement.

However, I would like to request an **immediate transfer** into the new lab, as Dr. Novitch has escalated matters to the point I feel physically threatened, and as is understandable I am not doing well in the current situation. Given the circumstances, it has become increasingly difficult for me to remain in the current environment, and I believe that moving to the new lab as soon as possible is the best course of action for my safety.

Additionally, I would like to clarify that my request for this transfer should not be interpreted as a waiver of any claims I have made or any ongoing concerns I have raised with the university. This transfer is being requested for my immediate health and safety, and I do not relinquish any rights or claims that I have brought forward whether to the university at large or elsewhere.

I greatly appreciate your support in expediting this process. Please let me know if there are any further steps I need to take or information I need to provide.

Thank you for your understanding and assistance, I remain very appreciative.

Kind regards,

Harout Gulessarian

On Jan 31, 2025, at 11:50 AM, Frohrip, Shelly <sfrohrip@irm.ucla.edu> wrote:

Hi Harout,

Thank you for this additional information. I'm inquiring with the department and will let you know as soon as I have more information.

 Catherine M Weston 2/4/25
To: Harout, hgulessarian@mednet.ucla.edu >

reply needed - meeting with Paul Micevych

Hi Harout

I was asked to set a meeting with you and Dr. Micevych. He is available on Thursday, February 13 at 1:30. Can you meet then?

Catherine Weston
Assistant to the Chair (Paul Micevych, PhD) P:
[\(310\) 206-3944](tel:(310)206-3944)
David Geffen School of Medicine at UCLA E:
cweston@mednet.ucla.edu
Department of Neurobiology
10833 Le Conte Ave, 73-214 CHS
Los Angeles, CA 90095-1763

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 redistribution or failure to maintain confidentiality

 **Harout Gulessarian** To: Shelly Frohrip >

Hi Shelly,

Just to keep you in the loop, I have heard back from the department after our conversation. Although, Dr. M is not available until next week which means I have to go through this unpleasant situation for another 10 days.

 **Shelly Frohrip** 2/4/25
To: Harout Gulessarian >

Hi Harout,

I will consult with the department to see if there is an interim measure we can put in place until 2/13.

Thanks,
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

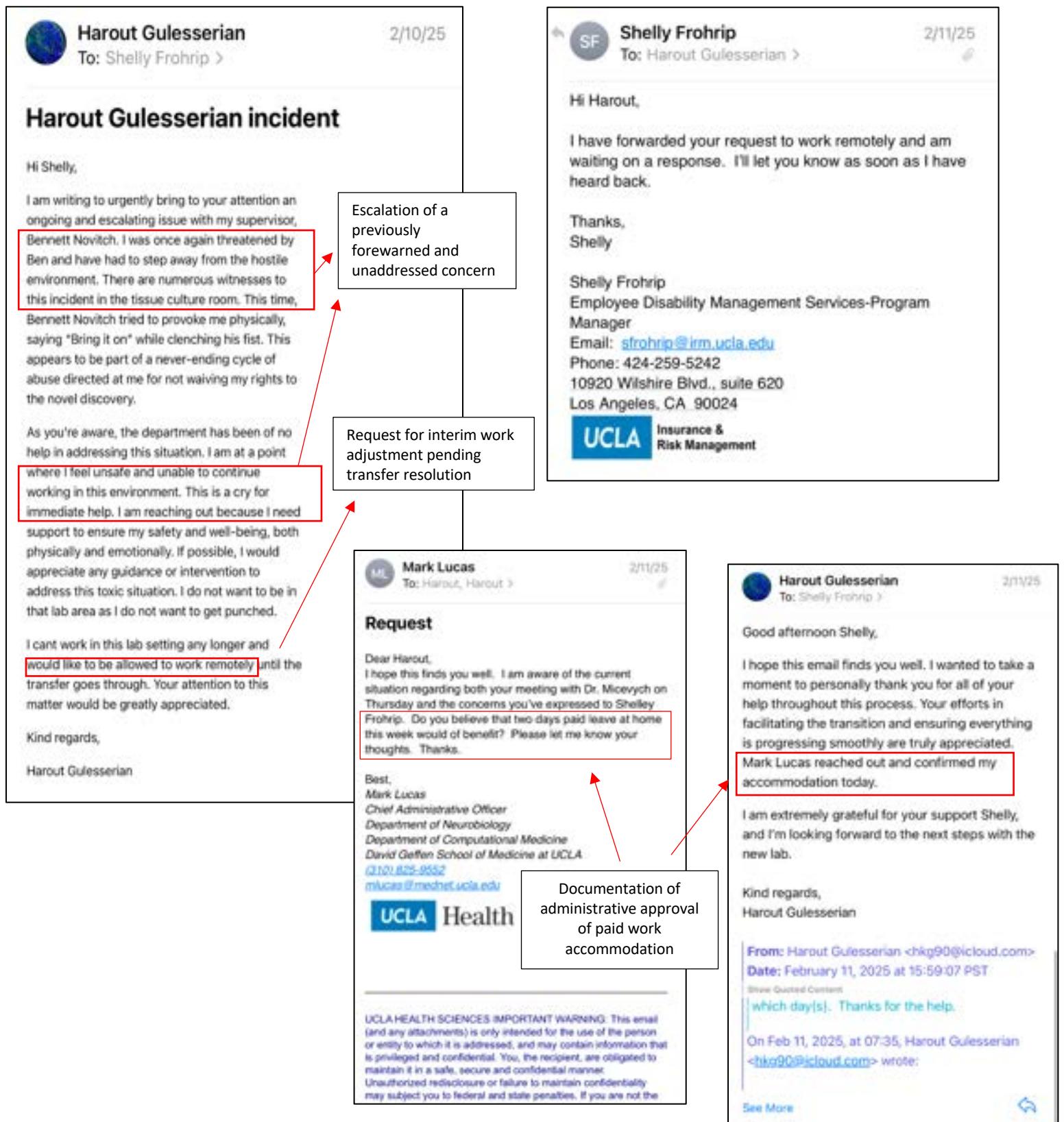
Ongoing Concerns Regarding Retaliatory Actions:

- Uncertainty about continued employment if the new lab is shut down
- Concerns that being transferred to a lab known to be closing constitutes a retaliatory placement by the department
- Request for formal acknowledgment and resolution of these ongoing concerns

Evidence & Evidentiary Exhibit 1 Cont.

Start of Transfer: Escalation of Retaliation

This period marks a peak incident of retaliation involving Bennett Novitch, which triggered an immediate response and further intensified concerns regarding targeted actions.



Evidence & Evidentiary Exhibit 1 continued

ML Mark Lucas 2/11/25
To: Harout, Harout >

Request

Dear Harout,

I hope this finds you well. I am aware of the current situation regarding both your meeting with Dr. Micevych on Thursday and the concerns you've expressed to Shelley Frorip. Do you believe that two days paid leave at home this week would be of benefit? Please let me know your thoughts. Thanks.

Best,
Mark Lucas
Chief Administrative Officer
Department of Neurobiology
Department of Computational Medicine
David Geffen School of Medicine at UCLA
(310) 825-9552
mlucas@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

ML Harout Gulessarian 2/11/25
To: Mark Lucas >

Dear Mark,

Thank you for your message and for addressing the situation concerning my meeting with Dr. Micevych and the concerns raised with the healthcare accommodation office manager Shelley Frorip.

I believe that taking **two days of paid leave** this week would be beneficial, allowing me time to manage the current circumstances. However, I would like to confirm that this instant offer, if accepted, will not result in any adverse actions or repercussions with regard to my employment, my academics or my standing within the organization in any capacity.

Kind regards,
Harout Gulessarian

ML Lucas, Mark February 11, 2025 at 3:18 PM
RE: Request
To: Harout Gulessarian

Hi, Harout. Thanks for the quick response. **I confirm that will not result in any adverse actions or repercussions with regard to your employment, your academics or your standing within the organization in any capacity.** This is merely to meet your accommodation request. Please let me know if you plan to take off and which day(s). Thanks for the help.

Best,
Mark

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, February 11, 2025 3:15 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Subject: Re: Request

[See More from Harout Gulessarian](#)

 Harout Gulessarian
Re: Request
To: Mark Lucas

February 11, 2025 at 3:59 PM

Dear Mark,

Thank you for your confirmation. I would like to inform you that I will be unavailable until 1:30 PM on Thursday, at which time I will meet with Dr. Micevych and transition into a new setting.

Thank you for reaching out today, and accommodating this matter.

Referring to: Thursday, February 13, 2025

Kind regards,

Harout Gulessarian

[See More](#)

 Lucas, Mark
RE: Request
To: Harout Gulessarian

February 11, 2025 at 4:07 PM

Great. Can you please confirm that you'll be taking this time Weds & Thurs? Thanks.

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, February 11, 2025 3:59 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Subject: Re: Request

[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 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.

 Found in Inbox - iCloud Mailbox

 Harout Gulessarian
Re: Request
To: Mark Lucas

February 11, 2025 at 4:24 PM

Dear Mark,

The Confirmed dates are: Wednesday 2/12/2025, and Thursday 2/13/2025 until 1:30PM. Thanks.

Kind regards,
Harout Gulessarian

[See More from Lucas, Mark](#)

 Lucas, Mark
RE: Request
To: Harout Gulessarian

February 11, 2025 at 4:40 PM

Thank you!

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, February 11, 2025 4:24 PM
To: Lucas, Mark <MLucas@mednet.ucla.edu>
Subject: Re: Request

[See More from Harout Gulessarian](#)

Lucas, Mark

Meeting Today

To: Harout Gulessarian, Cc: Gulessarian, Harout K.

February 13, 2025 at 5:55 PM

[Details](#)**Dear Harout,**

I understand that you met with Professor Micevych this afternoon. Can you please let Shelly Frohrip and me know whether you would like to transfer to his laboratory? Thanks.

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.

Found in Sent - iCloud Mailbox

Harout Gulessarian

Re: Meeting Today

To: Mark Lucas, Cc: Harout K. Gulessarian, Shelly Frohrip

February 13, 2025 at 7:01 PM

[Details](#)**Dear Mark,**

Thank you for your email. I would like to confirm that I will be accepting the role in Professor Micevych's laboratory for the time being, and that Shelly Frohrip has been informed already.

Dr. Micevych stated that I will be starting next week Tuesday 2/18/2025. Will you kindly identify Dr. Micevych's laboratory room number to me?

Thank you for your time and assistance.

Kind regards,

Harout Gulessarian

Lucas, Mark

RE: Meeting Today

To: Harout Gulessarian, Cc: Gulessarian, Harout K., Shelly Frohrip

February 14, 2025 at 7:53 AM

[Details](#)

Dear Harout,
Wonderful news. Thank you. Best if you meet Dr. Micevych at the same location as the interview (73-214 CHS) and he or Dr. Wong can walk you down to the lab on Tuesday morning (at 10:30 am). Please let me know if you have any questions.

Best,

Mark Lucas

Chief Administrative Officer

Department of Neurobiology

Department of Computational Medicine

David Geffen School of Medicine at UCLA

(310) 825-9552

mlucas@mednet.ucla.edu



Harout Gulessarian
To: Shelly Frohrip >

2/13/25

Officially transferred

Dear Shelly,

I wanted to inform you that I have laterally transferred out of Dr. Novitch's lab to Dr. Micevych's lab for the time being. I truly appreciate all of your efforts in securing my position and helping me navigate out of the challenging environment. Your support has meant so much to me, and I'm incredibly grateful for everything you have done.

Thank you Shelly, much appreciated.

Kind regards,

Harout Gulessarian



Shelly Frohrip
To: Harout Gulessarian >

2/13/25

Hi Harout,

I am so glad the meeting went well, and you will be transferred to Dr. Micevych's lab. Thank you for your kind words, I'm glad I was able to assist you.

Wishing you the best in the new lab.

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



Lucas provided a congratulatory response following my notification of lateral transfer, acknowledging the change. However, he subsequently treated me as if I remained under the Novitch lab, resulting in mishandling of my hours for that date. Additionally, given that I had exhausted all available time resources, it would be reasonable to expect that the administrator would either leave the time entry blank or proactively clarify the options available for compensation during an unusual circumstance such as a lab transfer under these conditions.

As an employee, I should not be expected to have full knowledge of all procedures for handling such situations, as it is not within the scope of my role. However, due to the lack of proper communication and structure provided by the neurobiology administrative team, I find myself compelled to conduct my own research in order to ensure that my rights to proper compensation are upheld.



Mark Lucas
To: Harout, Harout >

2/14/25

Closing out

Dear Harout,

As today is effectively your last day in the Novitch lab, Professor Novitch has asked if you could focus on documentation, specifically cleaning up and delivering the following materials to him. Thanking you in advance.

Items to be Returned to Lab

1. Lab Notebooks- paper and all electronic records. Include protocols and any other supporting information.
2. All data from experiments- raw and processed image files Zeiss format, TIFF, JPG, fastq and other sequence files, image composite files, powerpoint presentations, etc.
3. Portable hard drives obtained from the lab. If lab files are stored on personal hard drives, these files must be transferred and archived onto a data server and then erased from personal devices.



Lucas, Mark
Re: Harout Gulessarian [Paycheck Issues]

To: Gulessarian, Harout K.; Gulessarian, Harout; Nguyen, Helen A.; Frohrip, Shelly

March 6, 2023 at 3:00 PM

Details

Hi, Harout. I'm following up on this. Can you please let me know about 2/14? I want to get you paid for the outstanding days. Thanks.

[See More from Lucas, Mark](#)

Given that the days prior were designated as paid time off due to my need to escape the hostilities in the Novitch lab, as evidenced by the urgency of the situation, it raises the question of how I could be expected to return to a place where I felt my physical well-being was at risk—especially after I had already accepted a new position.

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.

Initiation of Timesheet Discrepancies: February Overview

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

Pay Period: 02/03/2025 - 02/15/2025 (History - Adjustments Allowed) B1

GULESSERIAN,HAROUT KARNIK

History Review

HISTORY

History Status (Not Approved, Processed, Completed)

Show History Pay Period Details

Hours	Sun 02/02	Mon 02/03	Tue 02/04	Wed 02/05	Thu 02/06	Fri 02/07	Sat 02/08	Sun 02/09	Mon 02/10	Tue 02/11	Wed 02/12	Thu 02/13	Fri 02/14	Sat 02/15	Total
	Normal Hours Worked	8.00	8.00			8.00			8.00	8.00					
Sick			8.00	8.00											16.00
Totals:	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	56.00

Paid Summary

Regular Time (REG)	8.00	8.00		8.00		8.00	8.00								48.00
Sick Leave (REG)			8.00	8.00											16.00

① Harout Gulessarian
Harout Gulessarian (Paycheck Issues)
To: Helen A. Nguyen

Dear Helen,

I hope you are well. I wanted to bring to your attention that I have not received payment for the two days of paid time off that I was promised from the previous paycheck. Could you please look into this and let me know when I can expect to receive payment for those two days? (Please see the screenshots provided below with Mark Lucas regarding the days in question from the previous paycheck).

2/12/2025 8 hours missing (Paid time off) (Previous paycheck)

2/13/2025 8 hours missing (Paid time off) (Previous paycheck)

Additionally, I am unable to add my hours for the last two weeks worked in Dr. Paul Micevych's lab since my lateral transfer, the current payroll has been locked. I have included my schedule and attendance below, with a total of 76 hours worked for the mentioned weeks (the current paycycle).

8:00 AM - 4:00 PM 2/7/2025 = 8 hours holiday pay

3:00 AM - 4:00PM 30 min lunch 2/8/2025 = 0.5 hours

3:00 AM - 3:30 PM 30 min lunch 2/9/2025 = 0.5 hours

3:00 AM - 4:30 PM 30 min lunch 2/10/2025 = 0.5 hours

3:00 AM - 3:00 PM 1 hour lunch 2/11/2025 = 0 hours

9:15AM - 4:00 PM 1 hour lunch 2/12/2025 = 0 hours

7:30 AM - 1:30PM (Normal Hours) 2/13/2025 = 8 hours normal 2 hours doctors (10-12)

7:30AM-4:00PM 1 hour lunch 2/14 = 7.5 hours worked

7:00AM - 4:00 PM 1 hour lunch 2/15 = 8 hours worked

Total hours for 2/13-2/15 = 54 hours

Thank you for your assistance, and I look forward to your prompt response.

Best regards,
Harout Gulessarian

This email was sent at the end of the following pay period, two weeks after I was initially supposed to receive payment.

(February 28, 2025 at 10:37 AM)

②

ML Lucas, Mark

RE: Harout Gulessarian (Paycheck Issues)

To: Harout Gulessarian; Nguyen, Helen A.; Cc: Shelly Froehling

Hi, Harout. Thanks for bringing to our attention. It looks like you did not fill out these days on your time sheet (see below screenshot). We can have these paid on the next cycle if you can verify by no later than mid-day Monday 3/3/25 what to do about the time for Friday 2/14/25. Can you please advise? We will then process accordingly (along with the missing 2/12 and 2/13). Thanks.

For the current pay period, I have "unapproved" so that you can fill out the time below yourself. Please let me know when you have updated HBS. Thanks for your help.

History Input Summary												Hide			
Hours	Sum 02/02	Mon 02/03	Mon 02/04	Wed 02/05	Thu 02/06	Fri 02/07	Sat 02/08	Sun 02/09	Mon 02/10	Tue 02/11	Wed 02/12	Thu 02/13	Fri 02/14	Sat 02/15	Total
Normal Hours Worked	8.00	8.00			8.00			8.00	8.00						48.00
Sick			8.00	8.00											16.00
Totals:	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	56.00

③ Harout Gulessarian
Fed: Harout Gulessarian (Paycheck Issues)
Cc: Mark Lucas, Helen A. Nguyen; Shelly Froehling

Good evening Mark,

Please see the forwarded email chain below as Helen's automatic email response indicated to contact you.

Thanks in advance for your help.

Kind regards,
Harout Gulessarian

[See More from Harout Gulessarian](#)

Meeting with Dr. Micevych Summary

Following a meeting with Dr. Micevych on Thursday, February 13, 2025, I was instructed not to report to work on Friday, February 14, marking the end of that pay week, and to return the following Tuesday 2/18/2025. As I had no remaining vacation hours, I left Friday blank on my timesheet and informed my HR representative to issue pay only for Wednesday and Thursday of that week. Mark Lucas was aware of this arrangement, as Gulessarian emailed Lucas on February 13, 2025, immediately after the meeting to relay what Dr. Micevych had instructed.

GULESSERIAN,HAROUT KARNIK (UCLA ID: 565876880 | UCPath ID: 10582324)
Full Acct Unit: NEUROBIO Barg.Unit: RX

History Review

History Status (Approved, Processed, Not Completed)

Show History Pay Period Details

Hours	History Input Summary												Total		
	Sun 02/16	Mon 02/17	Tue 02/18	Wed 02/19	Thu 02/20	Fri 02/21	Sat 02/22	Sun 02/23	Mon 02/24	Tue 02/25	Wed 02/26	Thu 02/27	Fri 02/28	Sat 03/01	
Normal Hours Worked			8.00	8.00	8.00	8.00			7.75	8.00	7.50	8.00	8.00	7.75	71.25
Holiday			8.00											8.00	
Totals:	0.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	7.75	8.00	7.50	8.00	8.00	79.25	

Paid Summary													
Regular Time (REG)		8.00	8.00	8.00	8.00	8.00	8.00	7.75	8.00	7.50	8.00	8.00	71.25
Holiday Pay (REG)		8.00											8.00

2. Mark Lucas emailed me requesting that I notify him when I submit my timesheet. I did not respond to this request, yet he proceeded to modify my hours, adding additional time that I did not work tampering with an already approved timesheet.

(UCLA ID: 565876880 | UCPath ID: 10582324)

Timesheet Action Audit for Pay Period Ending on 03/01/2025		
Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	3/5/2025 10:35:19 AM
Completion Removed	GULESSERIAN,HAROUT KARNIK	3/4/2025 7:31:36 PM
Timesheet Completed	GULESSERIAN,HAROUT KARNIK	3/4/2025 7:31:26 PM
Record Updated	LUCAS,MARK T	3/3/2025 3:30:22 PM
Record Updated	LUCAS,MARK T	3/3/2025 3:29:53 PM
Completion Removed	LUCAS,MARK T	3/3/2025 3:29:53 PM
Timesheet Completed	GULESSERIAN,HAROUT KARNIK	3/3/2025 7:12:44 AM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:11:54 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:11:35 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:10:56 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:10:22 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:10:22 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:08:00 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:06:13 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:05:38 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:05:06 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:03:53 PM
Approval Removed	LUCAS,MARK T	3/1/2025 6:52:00 AM
Approval Removed	LUCAS,MARK T	3/1/2025 6:51:42 AM
Timesheet Approved	NOVITCH,BENNETT G*	2/20/2025 9:04:36 AM
Record Inserted	HOLIDAY AUTOPOP	2/15/2025 12:56:58 AM

Additionally, I am unable to add my hours for the last two weeks worked in Dr. Paul Shvartschuk's lab since my lateral travels, the current payroll has been issued. I have included my schedule and attendance below, with a total of 76 hours worked for the mentioned weeks (in current paycheck).

8:00 AM - 4:00PM / 1/17/2025 - 8 hours Holiday pay

10:00 AM - 4:00PM / 1/18/2025 - 8 hours

8:00 AM - 1:30 PM / 1/18/2025 - 7 hours

8:00 AM - 1:30 PM / 1/19/2025 - 8 hours

8:00 AM - 1:30 PM / 1/20/2025 - 8 hours

8:00 AM - 1:30 PM / 1/21/2025 - 8 hours

8:00 AM - 1:30 PM / 1/22/2025 - 8 hours

8:00 AM - 1:30 PM / 1/23/2025 - 8 hours

8:00 AM - 1:30 PM / 1/24/2025 - 8 hours

8:00 AM - 1:30 PM / 1/25/2025 - 8 hours

8:00 AM - 1:30 PM / 1/26/2025 - 8 hours

8:00 AM - 1:30 PM / 1/27/2025 - 8 hours

8:00 AM - 1:30 PM / 1/28/2025 - 8 hours

Total hours for 1/18-1/28 = 76 Hours

This message was sent with High importance.

NA Nguyen, Helen A.

To: Nguyen, Helen A.

Fri 2/28/2025 1:10 AM

Timesheets for 2/16/25 - 3/1/25 due by Friday, February 28, 2025

Keep in mind that even though you add hours to your time

sheet it, is not considered submitted until you click the "Complete" button in the upper right hand corner of your timesheet. If time sheets are not submitted, it may delay your check to the following payday. As a reminder, instructions are below on how to complete your bi-weekly timesheet.

<https://hbssome.mednet.ucla.edu/>

1. Please logon to HBSS at <https://hbssome.mednet.ucla.edu/TPWebSSOAd/> (might be good to bookmark this site).
2. Please login using your mednet name and password.
3. This will take you to a screen that shows the deadline dates for submission of time sheets. On this page, at the top, you should see the option "Employee Tasks." Please click on that.



Reminder: Time sheets for pay period 2/16/25-3/1/25 due by Monday 3/4/25

LM Lucas, Mark

To: Lucas, Mark

Thu 3/27/2025 5:52 PM

Reminder: Time sheets for pay period 2/16/25-3/1/25 due by Monday 3/4/25. <https://mednet.uclahealth.org/timesheets/>. Thanks.

1. Helen initially entered the correct number of hours I reported working (~76), which I subsequently approved.

HAROUT'S REPORTED HOURS



Total hours for 2/16- 2/28 = 76 Hours

LUCAS' SUBMITTED HOURS



79.25

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

History Review

History Status (Approved, Processed, Completed)

Show History Pay Period Details

History Input Summary

Hide

Hours	Sun 03/02	Mon 03/03	Tue 03/04	Wed 03/05	Thu 03/06	Fri 03/07	Sat 03/08	Sun 03/09	Mon 03/10	Tue 03/11	Wed 03/12	Thu 03/13	Fri 03/14	Sat 03/15	Total
Normal Hours Worked		8.00	8.00	8.00	8.00	8.00			8.00	8.00	8.00	8.00	8.00		\$64.00
Totals:	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	\$64.00

Paid Summary

Regular Time (REG)	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	\$64.00

(UCLA ID: 505876880 | UCPath ID: 10582324)

Timesheet Action Audit for Pay Period Ending on 03/15/2025

Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	3/17/2025 2:06:13 PM
Timesheet Completed	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:58:51 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:58:23 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:57:51 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:57:34 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:57:15 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:57:00 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:56:42 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:56:20 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:55:59 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:55:39 AM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/17/2025 7:55:16 AM

Here is an example of a complete timesheet that I submitted independently when I was not locked out of the system. I am familiar with the process and have no difficulty navigating or using the HBS system correctly when I am not intentionally locked out due to retaliatory administrative issues.

This message was sent with High Importance.

Nguyen, Helen A.

To: Nguyen, Helen A.

Mon 3/17/2025 7:51 AM

Timesheets for 3/02/25 - 3/15/25 due by Friday, March 14, 2025

Keep in mind that even though you add hours to your time

sheet it is not considered submitted until you click the "Complete" button in the upper right hand corner of your timesheet. If time sheets are not submitted, it may delay your check to the following payday. As a reminder, instructions are below on how to complete your bi-weekly timesheet.

<https://hbssome.mednet.ucla.edu/>

1. Please logon to HBS at <https://hbssome.mednet.ucla.edu/TPWeb/SSOADM/> (might be good to bookmark this site).
2. Please login using your mednet name and password.
3. This will take you to a screen that shows the deadline dates for submission of time sheets. On this page, at the top, you should see the option "Employee Tasks." Please click on that.

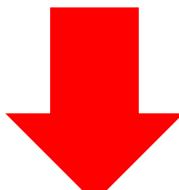


[Reply](#)

Definition of "Read Only" Status for the Following Timesheets

When a timesheet is marked as "read only," it means the user (employee) cannot add, edit, or delete any hours. This status effectively prevents any updates or submissions from being made.

Please note the specific dates on which these lockouts occurred, as they appear to have been strategically timed in a manner that prevented Gulessarian from receiving pay for hours worked in a timely manner. A concerning pattern of singling out Gulessarian for his whistleblowing acts is at full display.



Economic Hardship Due to Lockouts: Week of March 16, 2025

BEFORE

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876888 | UCPath ID: 10582324)
(Approved, Not Completed)

17:41 17:41 5G 3/28/2025

Input Summary
Paid Summary

3/17/2025 3/18/2025 3/19/2025 3/20/2025 3/21/2025 3/22/2025 3/23/2025 3/24/2025 3/25/2025 3/26/2025 3/27/2025 3/28/2025

3/28/2025 Holiday

day off → 8 hours 8 Hours 30 min lunch 6 hours 30 min lunch 8 hours 1 hour work 1 hour work

RE: Timesheet issues

Hi Harout,

I went ahead and unlocked your timesheet. You should now be able to input yours hours in!

Best Regards,

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

UCLA Health

From: Harout Gulesserian <hkg00@icloud.com>
Sent: Thursday, March 27, 2025 5:45 PM
To: Nguyen, Helen A.
<HelenANguyen@mednet.ucla.edu>
Subject: Timesheet issues

Hi Helen,

Will you kindly upload my hours for the past two weeks? My timesheet is locked once again.

Kind regards,

3/31/25

This message was sent with High importance.

Nguyen, Helen A.
To: Nguyen, Helen A.
Thu 3/27/2025 8:23 AM

Timesheets for 3/16/25 - 3/29/25 due by Thursday, March 27, 2025

Keep in mind that even though you add hours to your time sheet it is not considered submitted until you click the "Complete" button in the upper right hand corner of your timesheet. If time sheets are not submitted, it may delay your check to the following payday. As a reminder, instructions are below on how to complete your bi-weekly timesheet.

<https://bisasome.mednet.ucla.edu/>

1. Please logon to HBS at <https://bisasome.mednet.ucla.edu/TPWeb/SSOAd/> (might be good to bookmark this site).
2. Please login using your mednet name and password.
3. This will take you to a screen that shows the deadline dates for submission of time sheets. On this page, at the top, you should see the option "Employee Tasks." Please click on that.

I was locked out of my timesheet and had to contact Helen Nguyen to request that it be unlocked so I could properly enter my hours. It remains unclear why I was denied access before the pay period had closed and before I had the opportunity to input any time.

AFTER

UCLA ID: 505876888 | UCPath ID: 10582324

History Review

History Status (Approved, Processed, Completed)														
History Input Summary														
Hours	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
Normal Hours Worked	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	56.00
Vacation														0.00
Bank														0.00
Holiday														0.00
Total	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	56.00

Paid Summary

Regular Time (HRS)	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	8.00	56.00
Holiday Pay (HRS)													0.00
Bank (HRS)													0.00
Vacation (HRS)													0.00

Timesheet Action Audit for Pay Period Ending on 3/29/2025

Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	3/31/2025 2:39:09 PM
Timesheet Completed	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:16:25 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:16:08 PM
Record Updated	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:16:38 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:14:09 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:14:09 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:13:45 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:13:16 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:12:37 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:12:04 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:11:03 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:10:34 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	3/31/2025 2:08:48 PM
Approval Removed	NGUYEN,HELEN	3/31/2025 1:22:46 PM
Timesheet Approved	MICEVYCH,PAUL E*	3/31/2025 1:18:39 PM
Approval Removed	LUCAS,MARK T	3/31/2025 9:21:51 AM
Timesheet Approved	MICEVYCH,PAUL E*	3/31/2025 8:58:51 AM
Record Inserted	HOLIDAY AUTOPOP	3/16/2025 12:55:52 AM

Note:
According to Dr. Micevych, during an in-person meeting on May 6, 2025, at 11:00 AM, Dr. Micevych confirmed that he was not responsible for approving my timesheets prematurely

1

< Sent Harout Gulessarian Paych... ^ v

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Tuesday, March 18, 2025 8:49 AM
To: Nguyen, Helen A.
<HelenANguyen@mednet.ucla.edu>
Cc: Shelly Frohrip <sfrohrip@irm.ucla.edu>
Subject: Harout Gulessarian Paycheck Discrepancies

Hi Helen,

I hope you're doing well. I wanted to bring a couple of issues to your attention regarding my recent timesheets and paychecks.

1. In my last paid out paycheck, I noticed that I was overpaid. I worked 75.25 hours (See original email I had sent to you), but the total was altered to ~79 hours without me making any changes from my end.
2. For the current timesheet that was submitted, it shows regular hours for the 11th of March, but I was actually sick that day and used my sick hours (See image below).

Could you please help in resolving these discrepancies if possible? Thank you for your time and assistance; they are appreciated.

Kind regards,

Harout Gulessarian

07:50

< Sent Harout Gulessarian Paych... ^ v

07:50

Harout out due to illness

Gulessarian, Harout K.
To: Wong, Angela
Sent: 03/18/2025 8:49 AM
Good morning, Angela.
Just wanted to let you know that I will not be in today due to illness.
Kind regards,
Harout Gulessarian

Wong, Angela
To: Gulessarian, Harout K.
Sent: 03/18/2025 7:50 AM
Thank you for letting me know.
Angela

Re: [REDACTED] | Reply

outlook.office.com

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

2

Harout Gulessarian 4/1/25
To: Shelly Frohrip >

Follow-up on Reasonable Accommodation and Potential Lab Closure

Dear Shelly,

I hope this message finds you well.

I want to bring to your attention a significant issue regarding my current position and some new information I received. It appears that Dr. Micevych's lab is likely to close down in June 2025. A colleague essentially informed me that the department has already planned for this transition, with my colleague being assigned a role into another lab, one of which my colleague will move to once Dr. Paul Micevych's lab closes. If this information is confirmed, as I am sure you understand, it raises valid concerns about the viability of my current transitional reasonable accommodation role at this instant lab; at least, until UCLA identifies a more permanent role with appropriate reasonable accommodations for me.

Given that my position in Dr. Micevych's lab was set up to meet my reasonable accommodations request on a temporary basis (so as to finally remove me from the extremely hostile work environment in the Novitch/Butler labs), the potential closure of this instant lab warrants consideration of relocating my accommodations request to a more stable and enduring work environment—arguably one that will provide a long-term, viable job and career growth

< Sent Follow-up on Reasonable... ^ v

accommodations request to a more stable and enduring work environment—arguably one that will provide a long-term, viable job and career growth opportunities, as we previously discussed.

Additionally, the issues as they stand align with concerns about CAO Mark Lucas potentially placing me in a non-advancing role, indirectly achieving what his department was not able to do directly. With existing evidence and ongoing investigations, this might indicate a larger pattern of retaliatory harassment and discrimination aimed at facilitating my unlawful termination, especially in light of my reasonable accommodations situation at UCLA coupled with other related complaints.

Consequently, this new information necessitates a re-evaluation of alternative reasonable accommodation options; possibly identifying a more permanent and viable lab or more permanent workspace at UCLA. Given the potential closure of this lab, I certainly believe that it would be wise for me to request that UCLA act promptly under the circumstances so as to ensure a stable placement.

I wanted to keep you informed of these developments, as they continue to raise concerns about the future of my role and the reasonable accommodations process. Please let me know if you can clarify these details through other appropriate channels as the related departmental matters continue.

Thank you, Shelly, for your time and attention to these matters. Your support is greatly appreciated.

Kind regards,
Harout K. Gulessarian

Helen Nguyen's Negligence

After experiencing initial timesheet lockouts, Gulessarian reached out to HR representative on March 18. Despite the urgency of the matter, I did not receive a response until April 8—nearly a month later—and only after I escalated the issue to Shelly Frorip

From: Nguyen, Helen A.
HelenANguyen@mednet.ucla.edu
Sent: Tuesday, April 8, 2025 10:15 AM
To: Harout Gulessarian <hkg90@icloud.com>
Subject: RE: Harout Gulessarian Paycheck Discrepancies

Hi Harout,

I hope you are feeling better today! Thank you for your patience. For your timesheet on the day you were not in (3/11/25), would you like to use your sick leave to cover 3/11/25? In addition, I would like to check in with you to see how you are doing? Do you have any questions or concerns? I want to ensure you have an optimal environment.

I did see in a previous email that you had 2 days of PTO in February (2/12/25 and 2/13/25), have you been paid those days?

Best Regards,

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

[Back](#) 6 Messages [^](#) [v](#)

	Harout Gulessarian	3/18/25
Hi Helen, I hope you're doing well. I want to...		
	Helen A. Nguyen	4/8/25
Hi Harout, I hope you are feeling better tod...		
	Helen A. Nguyen	4/9/25
Hi Harout, I am following up on this to ensu...		
	Helen A. Nguyen	4/10/25
Hi Harout, I am following up on this as I ha...		
	Helen A. Nguyen	4/15/25
Hi Harout, I am following up on this as I ha...		
	Helen A. Nguyen	12:01
To: Harout Gulessarian >		
RE: Harout Gulessarian Paycheck Discrepancies		
Hi Harout,		
I am following up about your hours. Since I have not received a response from you yet, no further action will be taken on my end unless otherwise noted.		
Best Regards,		
Helen Nguyen (She/Her/Hers)		



Economic Hardship Due to Withheld Pay and Lockouts: Week of March 30, 2025

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

History Review

History Status (Approved, Processed, Not Completed)

Show Timesheet Pay Period Details

History Input Summary															
Hours	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
Normal Hours Worked	0.00	0.00													10.00
Total:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.00

Paid Summary

Regular Time (REG) 10.00

(UCLA ID: 505876880 | UCPath ID: 10582324)

Timesheet Action Audit for Pay Period Ending on 04/13/2025

Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	4/7/2025 3:39:54 PM
Timesheet Approved	MICEVYCH,PAUL E*	4/7/2025 3:39:48 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	4/7/2025 4:13:29 PM
Record Inserted	GULESSERIAN,HAROUT KARNIK	4/7/2025 4:13:11 PM

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

History Review

History Status (Approved, Processed, Not Completed)

History timesheet data does not exist.

(UCLA ID: 505876880 | UCPath ID: 10582324)

Timesheet Action Audit for Pay Period Ending on 04/26/2025

Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	4/2/2025 2:21:56 PM
Record Inserted	MICEVYCH,PAUL E*	4/2/2025 2:21:56 PM

View More

This message was sent with High importance.

Nguyen, Helen A.

To: Nguyen, Helen A.
Mon 4/7/2025 6:45 AM

Timesheets for 3/30/25 - 4/12/25 due by Friday, April 11, 2025

Keep in mind that even though you add hours to your timesheet it is not considered submitted until you click the "Complete" button in the upper right hand corner of your timesheet. If time sheets are not submitted, it may delay your check to the following payday. As a reminder, instructions are below on how to complete your bi-weekly timesheet.

<https://hbssome.mednet.ucla.edu/>

1. Please logon to HBS at <https://hbssome.mednet.ucla.edu/TPWeb/SSOADM/> (might be good to bookmark this site).
2. Please login using your mednet name and password.
3. This will take you to a screen that shows the deadline dates for submission of time sheets. On this page, at the top, you should see the option "Employee Tasks." Please click on that.

<https://hbssome.mednet.ucla.edu/>

Friday • Apr 11, 2025 • 08:07

Adjust

IMG_6696

Screenshot

No lens information

3 MP • 1290 x 2796 • 792 KB

Employee Tasks Home Help Log Out Help
Timesheets Time Off Requests Resources
Pay Period: 03/30/2025 - 04/12/2025 (Start: 03/30/25)

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324)
(Approved, Not Completed)

Full Acct Unit: NEUROBIO Bang.Unit: RX
Approved timesheet is Read Only

Input Summary															
Hours	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
Normal Hours Worked	0.00	0.00													10.00
Total:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.00

Paid Summary

Regular Time (REG) 10.00

Wednesday 04/02/25

Override Scheduled Shift

By: 0000-0000-0000-0000 At: 0000-0000-0000-0000 From: 0000-0000-0000-0000 To: 0000-0000-0000-0000

Scheduled Shift Actual Time Clock Hours

Start In/Out Map Location Location ID In/Out Map Duration

NO SCHEDULED SHIFT NO TIME CLOCK INFORMATION

Approved timesheet is Read Only

Following the failure to issue payment for my approved paid time off during the period of hostilities in the Novitch lab, the administration has now failed to pay me in full for the current pay period. On April 11—the official due date for timesheet submission—the system displayed a “read only” status, preventing me from entering my hours. I was effectively locked out of the system before I had the opportunity to record my time. Video evidence, recorded at 8:00 AM during regular work hours, is available to verify this occurrence if needed.

Worked Hours on Wednesday 04/02/25											
Time In	Hour	Minutes	Meal Break (min)	Time Clock Pay Code	Project	Enterprise Project	Full Acct Unit	Shift	Leave of Absence	Extra Overtime	Overtime
08:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
09:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
10:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
11:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
12:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
13:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
14:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
15:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
16:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
17:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
18:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
19:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
20:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
21:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
22:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
23:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
24:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
00:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
01:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
02:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
03:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
04:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
05:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
06:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
07:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
08:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
09:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
10:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
11:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
12:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
13:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
14:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
15:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
16:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
17:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
18:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
19:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
20:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
21:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
22:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
23:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
24:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
00:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
01:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
02:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
03:00	00	00	00	0000000000000000	0	0000000000000000	0	0000000000000000	0	0	0
04:00	00	00	00	0000000000000000	0	0000					

Economic Hardship Due to Withheld Pay and Lockouts: Week of April 13, 2025

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

History Review

History Status (Approved, Processed, Not Completed)

History timesheet data does not exist.

(UCLA ID: 505876880 | UCPath ID: 10582324)

Timesheet Action Audit for Pay Period Ending on 04/26/2025

Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	4/21/2025 2:21:56 PM
Record Inserted	MICEVYCH,PAUL E*	4/21/2025 2:21:56 PM

Lucas, Mark

Reminder to complete your time sheet

To: Gulessarian, Harout K... Harout Gulessarian

Inbox - iCloud March 15, 2025 at 8:49 AM

Thanks.

For the second pay period, no timesheet was made available in the system – it appeared completely blank, preventing me from submitting any hours

This message was sent with High importance.

Nguyen, Helen A.

To: Nguyen, Helen A.

Mon 4/25/2025 6:34 AM

Timesheet for 4/13/25 - 4/26/25 due by Friday, April 25, 2025

Keep in mind that even though you add hours to your time

sheet it is not considered submitted until you click the "Complete" button in the upper right hand corner of your timesheet. If time sheets are not submitted, it may delay your check to the following payday. As a reminder, instructions are below on how to complete your bi-weekly timesheet.

<https://hbssome.mednet.ucla.edu/>

1. Please logon to HBS at <https://hbssome.mednet.ucla.edu/TPWeb/SSOADM/> (might be good to bookmark this site).
2. Please login using your mednet name and password.
3. This will take you to a screen that shows the deadline dates for submission of time sheets. On this page, at the top, you should see the option "Employee Tasks." Please click on that.

Employee Tasks Manager Tasks Message Home Help

Reply

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324) (Approved, Not Completed)

Full Acct Unit: NEUROBIO Barg.Unit: RX
Approved Timesheet is Read Only

Show Pay Period Details											
Input Summary											
Hours	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Zero	Miss	Total	Net
Normal Hours Worked										0.00	
Total:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Thursday 04/24/25											
Override Scheduled Shift											
Shift	In	Out	Meal	Duration	Not Scheduled	Actual Time Clock Hours	Shift	In	Out	Meal	Duration
No SCHEDULED SHIFT						NO TIME CLOCK INFORMATION					

Worked Hours on Thursday 04/24/25											
Show Exceptions											
Hours	Minutes	Meal Break (min)	Title Code/ Pay Code	Project Enterprise Project	Full Acct Unit Shift	Leave of Absence	Extra Overtime	Overtime	Message		
9	00	0	<Title Code> <Pay Code>	<Project> <Enterprise Project>	<Full Acct Unit> <Shift>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
9	00	0	<Title Code> <Pay Code>	<Project> <Enterprise Project>	<Full Acct Unit> <Shift>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
9	00	0	<Title Code> <Pay Code>	<Project> <Enterprise Project>	<Full Acct Unit> <Shift>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
0	00										

Once again, I was instructed to complete my timesheets and received email reminders implying non-compliance. However, throughout this time, my timesheets were locked, preventing me from accessing or submitting them. It is unreasonable to expect compliance when I am denied access to the very system required to fulfill that responsibility to be paid on time without further delay.

Missing Pay: 144 Hours from the last two paychecks alone

Total number of work hours for which I have not been compensated to date.

 **Paul Micevych** 4/15/25
To: Harout, Angela >

Re: Flat tire

Thanks for letting us know.

Regards,
- Paul

From: Harout Gulessarian <hkg90@icloud.com>
Date: Tuesday, April 15, 2025 at 07:26
To: Micevych, Paul <pmicevych@mednet.ucla.edu>, Wong, Angela <awong@mednet.ucla.edu>, Wong, Angela <AMWong@mednet.ucla.edu>
Subject: Flat tire

Hi Paul and Angela,
Just a quick note to let you know that I have a flat tire this morning. I'll be in lab as soon as I can get it taken care of.
Thanks for your understanding.
Harout

 **Harout Gulessarian** 4/15/25 at 11:10 AM
Re: Flat tire
To: Micevych, Paul

Good morning, Paul.

Thank you so much for your understanding regarding the car situation. It turns out there was a nail in my tire, which caused it to leak quite rapidly. The technician was able to put on a spare, so I'll need to get the original tire patched at a mechanic shop later today.



Despite the hiccups, I was still able to make it to work by 8:00 AM. The tasks assigned to me today – HIC Day 1 – have been completed, and I currently don't have anything else pending in the lab. I also wanted to let you know that for my last paycheck, I was not able to input my hours in the timesheet as I was locked out Friday morning when I attempted to do so. Unfortunately, only 16 out of the 80 hours were successfully submitted, so my paycheck will be ~84 hours short. Please let me know what the best next steps would be to resolve this.



Harout Gulessarian Harout Gulessarian | Paul: Any books for the day?
To: Micevych, Paul

Good morning, Paul.

I hope all is well on your end! I just want to get you up-to-speed with where I am in the lab currently. Angela had forwarded the attached paper with a brief verbal rushed statement on the 23rd of April (less than a minute long). That I establish my own protocols, that I'll work w/ two days a week (I don't know where the location is), and if I need to order anything I order it. That's about the full extent of the instruction(s) I have received—no additional context or communication outside the paper that was forwarded to me attached (below plus the above).

I respect my prior office preferences and again today to discuss this in person, but unfortunately missed you. Since I have had no engagement from or w/ Angela—not even a returned greeting of hello or numerous occasions—it's difficult to determine how best to proceed.

Could you please clarify:

- What is the actual goal or intended outcome of this project?
- Is this work building on or replicating past experiments?
- Are there any specific expectations regarding methodology, output, or scope?

I'm committed to moving this forward productively, collaboratively, and independently as you prefer, but without direction or any communication, it's a challenge to ensure I'm aligned with any and all expectations of me.

Also, as a gentle reminder: I was underpaid in my last paycheck (80 hours), and I was locked out of the system for my current paycheck (80 hours). That brings the total to 164 hours not yet paid and/or processed from the past few weeks alone. I'd appreciate your help in getting these matter(s) resolved.

Thank you for your time, guidance, input, and assistance Paul; all are greatly appreciated!

Kind regards,
Harout Gulessarian

Begin forwarded message:

Dr. Paul Micevych stated during our in-person meeting on May 6, 2025, that he was not the individual who responded to Gulessarian's email and appeared to have no knowledge of the ongoing issue of Gulessarian being underpaid. This is despite records from the HBS timesheet audit indicating that Dr. Micevych had been listed as the approver on the relevant timesheets and that actions such as locking Gulessarian out of the system were occurring under his authorization, along with the emails Gulessarian sent to Dr. Micevych that went unanswered. It was later confirmed by Dr. Paul Micevych that Dr. Paul Micevych was not the one who was operating his email.

Evidence & Evidentiary Exhibit 2 – Underpayment of Wages

Paycheck reflecting negative \$1,200 in expected compensation for 80 hours of work, with payment issued for only 16 hours. A total of 64 hours is missing from this pay period.

Example 2: On top of all of this, I was only paid for 16 hours of work when I actually worked 80 hours for today's paycheck. This happened again because I was locked out of the system, and despite raising the issue, I received no response or guidance on what to do to get paid on time. Being short \$1,200 is a substantial amount for anyone, especially when dealing with the ongoing nightmare. It is a hardship that continues to negatively impact my ability to manage day-to-day expenses and adds to the stress of this already intolerable situation.

Attachment

Attachment

I am also forwarding my original message sent to Anna Bebe here for your viewing.

FWD:

Dear Irma Baba,

Thank you for reaching out and for your willingness to discuss accommodations for my upcoming interview with the SD&C and DPO offices, respectively. I would like to clarify my request regarding the accommodations I need for the interview with any investigator involved in my case, including those outside of the departments mentioned above. I kindly ask that these reasonable accommodations be followed for all interviews related to my case.

Specifically, I would appreciate receiving the questions in advance and conducting the interview via video. This request is based on certain challenges I face that affect my ability to participate effectively. I experience difficulty processing information and communicating verbally in real-time, especially when the information pertains to stressful events that I have been experiencing during my employment at UCLA. These situations often trigger strong emotional responses, leading to anxiety and physical symptoms such as shortness of breath, chest tightness, and chest pains, which significantly impair my ability to concentrate and focus.

Having the visual component of a video interview helps me feel calmer and more grounded, which enables me to engage more effectively. Additionally, I experience some challenges with hearing, which can further hinder my ability to respond fully and accurately.

Receiving the questions in advance and conducting the interview via video will allow me to participate in a more meaningful and accurate manner, ensuring a better exchange throughout the process. Thank you again for your understanding and assistance.

Best regards,
Harout Guvenserian

Evidence & Evidentiary Exhibit 3 – ~\$1,500 Paycheck Withheld for 80 Hours Worked

This exhibit reflects the second consecutive instance of non-payment. Despite working approximately 80 hours during this pay period, I am effectively being denied an estimated \$1,500.00 USD after taxes with the HBS system as “Approved timesheet is read only”.

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPATH ID: 10582324) (Approved, Not Completed)
 Full Acct Unit: NEUROBIO Barg.Unit: RX
 Approved timesheet is Read Only

Input Summary														Show Period Details	Hide
Hours	Sun 04/13	Mon 04/14	Tue 04/15	Wed 04/16	Thu 04/17	Fri 04/18	Sat 04/19	Sun 04/20	Mon 04/21	Tue 04/22	Wed 04/23	Thu 04/24	Fri 04/25	Sat 04/26	Total
Normal Hours Worked:															0.00
Totals:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Thursday 04/24/25

Override Scheduled Shift

In: <input type="button" value="▼"/> <input type="button" value="▼"/> Out: <input type="button" value="▼"/> <input type="button" value="▼"/> Meal: <input type="button" value="▼"/> Duration: 0.00 <input type="checkbox"/> Not Scheduled									
Scheduled Shift		Actual Time Clock Hours							
Shift	In	Out	Meal	Duration	Location	In	Out	Meal	Duration
NO SCHEDULED SHIFT					NO TIME CLOCK INFORMATION				

Worked Hours on Thursday 04/24/25

Hours	Minutes	Meal Break (min)	Title Code/ Pay Code	Project/ Enterprise Project	Full Acct Units Shift	Leave of Absence	Extraunchd	Ov er night	Message
0	00	0 <input type="button" value="▼"/>	<Title Code> <input type="button" value="▼"/> <Pay Code> <input type="button" value="▼"/>	<Project> <input type="button" value="▼"/> <Enterprise Project> <input type="button" value="▼"/>	<Full Acct Unit> <input type="button" value="▼"/> <Shift> <input type="button" value="▼"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
0	00	0 <input type="button" value="▼"/>	<Title Code> <input type="button" value="▼"/> <Pay Code> <input type="button" value="▼"/>	<Project> <input type="button" value="▼"/> <Enterprise Project> <input type="button" value="▼"/>	<Full Acct Unit> <input type="button" value="▼"/> <Shift> <input type="button" value="▼"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
0	00	0 <input type="button" value="▼"/>	<Title Code> <input type="button" value="▼"/> <Pay Code> <input type="button" value="▼"/>	<Project> <input type="button" value="▼"/> <Enterprise Project> <input type="button" value="▼"/>	<Full Acct Unit> <input type="button" value="▼"/> <Shift> <input type="button" value="▼"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
0	00								

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

History Review

History Status (Approved, Processed, Not Completed) 

History timesheet data does not exist.

(UCLA ID: 505876880 | UCPATH ID: 10582324)

Timesheet Action Audit for Pay Period Ending on 04/26/2025		
Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	4/21/2025 2:21:56 PM
Record Inserted	MICEVYCH,PAUL E*	4/21/2025 2:21:56 PM

Evidence & Evidentiary Exhibit 4 – Josh Samuels email where respondents try to put the blame on Gulessarian when in fact its internal lockouts are causing the adverse actions.

JS Samuels, Josh April 30, 2025 at 5:51 PM
RE: Harout Gulessarian ; Urgent Follow-Up on Unresolved Complaint and Ongoing Conduct
To: Harout Gulessarian

Hello, Harout

I have looked into your email further.

- Our Administrator who receives Abusive Behavior Complaints was unable to see an Abusive Behavior complaint submitted by you on January 31, 2025. Would you mind forwarding that information so that it can be reviewed?
- Concerns you are being retaliated against, harassed, and/or discriminated against due to your protected class are under the purview of Staff Diversity and Compliance. Their contact information is here: <https://adminvc.ucla.edu/equity/reporting/SDC>
- Regarding concerns you are being retaliated against for disclosures and formal complaints, please understand that these concerns are being addressed by the UCLA Office of Compliance. If you have questions about this process please reach out to them at <https://compliance.ucla.edu/> .
- Regarding your concern about your paycheck, I checked with the Department and they informed me the issue can be rectified by you filling out the HBS time sheet for the applicable pay period. If you contact Helen Nguyen (helenanguyen@mednet.ucla.edu Neurobio HR Analyst) and mention this to her, she will send you a paper (Excel template) time sheet. You can then list whatever additional time between 4/2-4/12 has not been paid, and submit to her. She will then submit for payment.

Thank you,

--Josh

[See More from Samuels, Josh](#)

HN Helen A. Nguyen 5/2/25
To: Harout Cc: Harout >

Timesheet for Pay Period 3/30/25 – 4/12/25

Hi Harout,

Can you please complete the manual paper timesheet attached for the Pay Period of 3/30/25 – 4/12/25 along with Dr. Micevych's signature approval? Once I receive your timesheet back, I can process this for you.

Best Regards,

Helen Nguyen, (She/Her/Hers)
Human Resources Analyst
Department of Neurobiology
Department of Computational Medicine
David Geffen School of Medicine at UCLA
P: 424-936-3409
E: Helen.A.Nguyen@mednet.ucla.edu

UCLA Health

UCLA HEALTH SCIENCES IMPORTANT WARNING: This email (and any attachment(s)) is only intended for the use of the person to whom 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.

E Blank ppe Bi-Weekly Timesheet.xls 102 KB



Bi-Weekly Employee Timesheet

Pay Period: 3/30/2025 thru 4/12/2025

Name: Harriet Gleserman
 Title: Staff Research Associate

Employee ID: 50587688c
 PI: Dr. Paul Nicewych

Account/CC/Fund:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date	3/30	3/31	4/01	4/02	4/03	4/04	4/05	4/06	4/07	4/08	4/09	4/10	4/11	4/12	
Hours	Paid	Paid	8	8	8			8	8	8	8	8			64 unpaid Hours due to HBS timesheet lockout
Code															

Account/CC/Fund:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date															
Hours															
Code															

Account/CC/Fund:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date															
Hours															
Code															

Total Hrs:

to be Paid:

There are / are not changes for the previous pay period. Prior pay period recap here:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date															
Hours															
Code															

Officer Use Only

Absence and Overtime Codes

Processed by:	VAC: Vacation	OI: Overtime
	HSL: Sick Leave	OT: Ovt/Dly
	HOL: Holiday	LWOP: Leave w/o Pay
Date:	CTO: Comp time taken	PT: Family Care
	CTA: Comp time earned	

SIGNATURES

I certify that the hours reported above are correct:

Employee: Date: 5/18/25
 Supervisor: Date: 5/18/2025

TIMESHEETS WILL NOT BE PROCESSED
WITHOUT A SUPERVISOR SIGNATURE



Bi-Weekly Employee Timesheet

Pay Period: 4/13/25thru 4/26/25Name: Hafsat k. GosselionTitle: SEA

Account/CC/Fund:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date	4/3	4/4	4/5	4/6	4/7	4/8	4/9	4/20	4/21	4/22	4/23	4/24	4/25	4/26	
Hours	8	8	8	8	8			8	8	8	8	8	8		
Code															

Employee ID: SC5 876880PI: DR. Paul Micewich

Account/CC/Fund:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date															
Hours															
Code															

Account/CC/Fund:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date															
Hours															
Code															

Total Hrs:

to be Paid

There are / are not changes for the previous pay period. Prior pay period recap here:

	SU	M	T	W	TH	F	SA	SU	M	T	W	TH	F	SA	TOTAL
Date															
Hours															
Code															

Officer Use Only	Absence and Overtime Codes	
Powered by	AC: Vacation	AB: Absent
	AL: Sick Leave	AD: Jury Duty
	AO: Holiday	ABWP: Leave with Pay
	CTO: Comp time taken	FL: Family Leave
Date	CIA: Comp time carried	

TIMESHEETS WILL NOT BE PROCESSED
WITHOUT A SUPERVISOR SIGNATURE

SIGNATURES

I certify that the hours reported above are correct:

Employee:

Date 5/18/2025

Supervisor:

Date 5/18/2025

Supervisor:

Date

Evidence & Evidentiary Exhibit 5 – Consecutive Timesheet Lockouts Creating Barriers to Missing Pay

See exhibit 1 for further details

Employee Tools Messages Home Log Off Help
 Download - Times Off Request - Business

Pay Period: 03/26/2025 - 04/12/2025 Owner: HR

GULESSERIAN,HAROUT KARNIK

Approved timesheet is Read Only

Show Pay Period Details

Input Summary

Hours	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
Normal Hours Worked	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Paid Summary

Regular Time (REG)	0.00	0.00													0.00
--------------------	------	------	--	--	--	--	--	--	--	--	--	--	--	--	------

Wednesday 04/02/25

Override Scheduled Shift

In	Out	Meal	Duration	Meals	Out	Over	Overnight	
Scheduled Shift				Actual Time Clock Hours				
In	Out	Meal	Duration	Location Info/Out	In	Out	Meal	Duration
NO SCHEDULED SHIFT				NO TIME CLOCK INFORMATION				

Worked Hours on Wednesday 04/02/25

Time In/Out	Hours	Minutes	Meal Break (min)	Title Code/ Pay Code	Project/ Enterprise Project	Full Acct Unit/ Shift	Leave of Absence	Extra Overtime	Ov Night
Time In: 04:30	00:00	00	00	<Title Code>	<Project>	<Shift>			
Time Out: 05:30	00:00	00	00	<Pay Code>	<Enterprise Project>	<Shift>			
Time In: 05:30	00:00	00	00	<Title Code>	<Project>	<Shift>			
Time Out: 06:30	00:00	00	00	<Pay Code>	<Enterprise Project>	<Shift>			
Time In: 06:30	00:00	00	00	<Title Code>	<Project>	<Shift>			
Time Out: 07:30	00:00	00	00	<Pay Code>	<Enterprise Project>	<Shift>			
Total:	0.00	0.00	0.00						
Notes:	0	00							

Helen A. Nguyen
 To: Harout Gulessarian >
 3/31/25

RE: Timesheet issues

Hi Harout,

I went ahead and unlocked your timesheet. You should now be able to input yours hours in!

Best Regards,

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

UCLA Health

From: Harout Gulessarian <hkg90@icloud.com>
 Sent: Thursday, March 27, 2025 5:45 PM
 To: Nguyen, Helen A.
 <HelenA.Nguyen@mednet.ucla.edu>
 Subject: Timesheet issues

Hi Helen,

Will you kindly upload my hours for the past two weeks? My timesheet is locked once again.

Attachment: Attachment

GULESSERIAN,HAROUT KARNIK (UCLA ID: 505876880 | UCPath ID: 10582324) (Approved, Not Completed)

Full Acct Unit: MEDUR090, Regd Unit: RX

Approved timesheet is Read Only

Show Pay Period Details

Input Summary

Hours	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Total
Normal Hours Worked	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Thursday 04/03/25

Override Scheduled Shift

In	Out	Meal	Duration	Meals	Out	Over	Overnight	
Scheduled Shift				Actual Time Clock Hours				
In	Out	Meal	Duration	Location Info/Out	In	Out	Meal	Duration
NO SCHEDULED SHIFT				NO TIME CLOCK INFORMATION				

Worked Hours on Thursday 04/03/25

Hour	Minutes	Meal Break (min)	Title Code/ Pay Code	Project/ Enterprise Project	Full Acct Unit/ Shift	Leave of Absence	Extra Overtime	Over night	Message
0	00	0	<Title Code>	<Project>	<Shift>				
0	00	0	<Pay Code>	<Enterprise Project>	<Shift>				
0	00	0	<Title Code>	<Project>	<Shift>				
0	00	0	<Pay Code>	<Enterprise Project>	<Shift>				
0	00	0	<Title Code>	<Project>	<Shift>				
0	00	0	<Pay Code>	<Enterprise Project>	<Shift>				
0	00	0	<Title Code>	<Project>	<Shift>				
0	00	0	<Pay Code>	<Enterprise Project>	<Shift>				

Evidence & Evidentiary Exhibit 6 – Stated Objectives by Provost and Executive Vice President for Academic Affairs, Michael T. Brown, Ph.D.

This exhibit highlights the institutional objectives and principles underscored by Provost and Executive Vice President for Academic Affairs, Dr. Michael T. Brown, which are relevant to the standards of fair treatment, accountability, and administrative integrity that should be upheld in this matter.

UNIVERSITY OF CALIFORNIA
BERKELEY • DAVIS • IRVINE • LOS ANGELES • MERRIT ISLAND • RIVERSIDE • SAN DIEGO • SAN FRANCISCO
 SANTA BARBARA • SANTA CLARA

OFFICE OF THE PROVOST AND
EXECUTIVE VICE PRESIDENT FOR ACADEMIC AFFAIRS

OFFICE OF THE PRESIDENT
121 Franklin Street, 12th Floor
Oakland, California 94607-5000

April 4, 2022

CHANCELLORS
EXECUTIVE VICE CHANCELLORS/PROVOSTS
ACADEMIC COUNCIL CHAIR ROBERT HORWITZ
LABORATORY DIRECTOR MICHAEL WITHERELL
ANR VICE PRESIDENT GLENDA HUMISTON

Re: Recognizing Innovation Transfer and Entrepreneurship in the Academic Personnel Process

Dear Colleagues:

The University of California is proud of its preeminent role as a fount of new discoveries in all aspects of our work – advancing teaching and learning, basic scientific and humanistic research, medicine, technology, engineering, and the arts. Part of the mission of UC, particularly as a land-grant institution, is to move these discoveries and advances from the University into society at large. To help guide UC in this endeavor, the UC Regents established [Regents Policy 5105: Policy on Innovation Transfer & Entrepreneurship](#), effective May 13, 2021. To ensure that UC's innovation transfer and entrepreneurship programs succeed at the systemwide and campus levels, the following objectives were established:

- Promote the translation of UC's discoveries into useful products, services, and innovations that not only provide value to individuals and society, but also endeavor to uplift the human condition;
- Inspire the passion of our faculty and student inventors, as well as provide the problem-solving and collaborative support necessary to translate those ideas into real-world solutions having societal benefit; and
- Pursue fair value for our intellectual property so UC can continue to grow its excellence in scholarship, research, and global impact.

These objectives are consistent with the University's mission. Therefore, the participation of academic appointees in scholarly activities which realize these objectives should be recognized through academic personnel review processes, including appointment, merit review, promotion, and tenure. While evaluation of much of this work (such as patents) is already taken into consideration in the review process, the methods in which UC carries out its mission of teaching, research, and service is always evolving, and so must how we assess our work.

The changing landscape of innovation transfer and entrepreneurship precludes a prescriptive approach to consideration in the review process. In consultation with the Academic Senate,

contributions should be evaluated under the current framework of the Academic Personnel Manual (APM) and may fall under areas of teaching, research and creative work, or service. APM section 210-14(d) provides useful flexibility in the application of review criteria when the work of faculty members departs from established academic patterns or where changes in emphasis and intent occur in an academic career. This flexibility does not relax the high standards of UC, but, rather, acknowledges that scholarship will evolve and the University will enter new fields of endeavor and reflect its activities over time.

The following list represents examples of activities that might be presented in the review process when applicable:

- Applied research and/or research translation through public-private partnerships
- Research and/or development funding or support from industry, private venture, or other for-profit sources
- Technology transfer-related grants and contracts
- Collaboration with non-academic entities, such as externally-sponsored centers and institutes, and other collaborative entities for scholarly discovery
- New approaches and innovative methods for teaching and learning
- Creation of intellectual property and disclosure/referencing
- Dissemination of knowledge through non-traditional means
- Patents, copyrights, or licenses of inventions, processes, procedures, software, or creative works applied for, pending, and awarded
- License or royalty income received
- Clinical advancements in procedures and practices
- Creation and contributions to start-up companies or services
- Commercialization and impact of research and other scholarly activities
- Mentoring, nurturing, and encouraging innovative, inventive, and entrepreneurial drive in students and peers
- Supporting diversity of culture and perspective in innovation transfer and entrepreneurship through sponsorship and visibility of translational research by persons underrepresented in these areas
- Providing students with translational research and entrepreneurial experience that provide a connection to real-world problems

As is already established in the APM, candidates for tenure are best served by documenting content, quality, and level of contribution in their endeavors. Academic appointments promoting translational research, innovation, and entrepreneurship activities should demonstrate how these efforts contribute to the mission of UC and its societal goal. Recognizing the diversity of scholarship and research at UC, campuses are encouraged to formulate standards for the consideration of such activities in the review process, paying attention to departmental and disciplinary distinctions.

To meet the objectives established by the Regents and expand of a preeminent institution, it is mission-critical that UC recognize the integrative nature of basic research, innovation transfer, and entrepreneurship. I request that you to work with your faculty to credit these traditional activities as well as basic research in the review process.

Sincerely,


Michael T. Brown, Ph.D.
Provost and
Executive Vice President for Academic Affairs

UC Regents
President Davis
Academic Council Vice Chair (Co-chair)
Vice Provost Caltech
Vice President Malibault
Secretary and Chief of Staff to the Regents Board
Vice Provost/Vice Chancellor Academic Personnel/Academic Affairs
Associate Vice Provost Law
Associate Vice Provost/Assistant Vice Chancellor/Director - Academic Personnel
Executive Director Board
Director Grant

Evidence & Evidentiary Exhibit 7 – Gulesserian Exercises Rights Under UCLA Procedure 955.1

 **Harout Gulesserian**

Request for Release of Patent Rights Under UCLA Procedure 955.1 – Invention Disclosed in Manuscript Dated February 27, 2024.

To: chancellor@ucla.edu

Sent - iCloud April 4, 2025 at 4:55 PM

Harout Gulesserian
6403 Valencia St.
Tujunga Ca 91042
Harout@ucla.edu
818-623-8721
04/04/2025

UCLA Office of the Chancellor
Attn: UCLA Chancellor Dr. Julio Frank
UCLA Chancellor's Office Box 951405 2147 Murphy Hall Los Angeles, CA 90095-1405
Email: chancellor@ucla.edu

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

Confidentiality Notice:

This communication, including any attachments, contains confidential and privileged information intended solely for the use of the individual or entity to which it is addressed. The information is legally protected from unauthorized disclosure. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or copying of this communication, in whole or in part, is strictly prohibited. If you have received this communication in error, please notify the sender immediately by return email and permanently delete all copies of the message and any attachments. Any unauthorized use or disclosure of this communication may result in legal action. The materials contained herein are for the exclusive use of the intended recipient(s) and must not be shared with any third party without prior written consent from the sender.

Dear UCLA Chancellor Dr. Julio Frank and the rest of the UCLA community at large:

I write on behalf of myself Harout Gulesserian (the "Inventor") to formally request that the University of California, Los Angeles ("UCLA") release all rights, titles, and interest in the intellectual property (the "Invention") accidentally discovered by the Inventor Harout Gulesserian and disclosed to UCLA's Technology Development Group ("TDG") Chief Intellectual Property Officer Charanjeet Arora by the inventor Harout Gulesserian in the manuscript submissions titled Accelerated Cerebral Organoid Protocol (ACOP) dated February 27 2024 (see attached below all communications with UCLA TDG), pursuant to UCLA Procedure 955.1.

Basis for Request

1. UCLA's Election Not to Proceed: Per Section III of Procedure 955.1, UCLA may release patent rights to inventors if it elects not to file a patent application or commercialize the invention. To the Inventor's knowledge, UCLA has not pursued protection or commercialization of the invention.

2. No Sponsoring Federal Funding Conflicts: The instant accidental invention was seemingly not developed using federal funding by definition of being an accident, nor does it appear that sponsored agreements would arguably preclude UCLA release under Section III(1).*

3. Full Disclosure: The Inventor has complied with all disclosure obligations (Section III(2)), including material facts about the invention and its commercial potential.

Proposed Terms

The Inventor agrees to the following conditions outlined in Procedure 955.1:

- Assignment to Co-Inventors: If applicable, the Inventor will execute assignments to co-inventors and waive rights to University income under Section III(3).
- No Further Use of University Resources: The Inventor affirms that no UCLA support, services, or facilities will be used for further development (Section III(4)).
- University's Retained Rights: The Inventor acknowledges UCLA's reserved rights under Section III(5) (e.g., non-profit research use).

Financial Obligations

The Inventor will:

- Reimburse UCLA for pro rata patent expenses (Section III(6)(a)).
- Pay 20% of Net Income (capped at 5% equity, if applicable) per Section III(6)(b).

Action(s) Requested

We respectfully demand that UCLA:

1. Confirm in writing its election not to pursue patent protection or commercialization of the invention;
2. Execute a release agreement transferring all rights to the Inventor, subject to the above terms;
3. Provide an accounting of any outstanding patent expenses to be reimbursed.

*Attached are copies of the TDG disclosures (Manuscript of the invention delivered to TDG and any prior TDG correspondence.) *More detailed knowledge of such matters is in the exclusive possession of UCLA and Inventor does not have access to these details.

Please kindly respond within fifteen (15) days of this letter. If UCLA declines this request, for union reasons, among others, we very respectfully ask for a detailed explanation citing the applicable policy or legal basis.

Sincerely,

Harout Gulesserian

UCLA Staff Research Associate I Neurobiology

Inventor, creator & discoverer of Accelerated Cerebral Organoid Protocol and the use of small molecule SB-590885 during neural induction.

UCLA Procedure 955.1: Release of Patent Rights to Inventors

Issuing Officer: Vice Chancellor for Research

Responsible Department: Technology Development Group

Effective Date: July 9, 2018

Supersedes: New

I. PURPOSE & SCOPE

II. DEFINITIONS

III. STATEMENT

IV. REFERENCES

I. PURPOSE & SCOPE

The purpose of this Procedure is to articulate the conditions in which the University of California (“University”) will release patent rights to their Inventors. This Policy applies to all employees and others as specified in the University of California Patent Policy (the “Patent Policy”).

II. DEFINITIONS

For the purposes of this Procedure:

Inventor(s) refers to individuals who are identified as Inventors on the patent rights pursued on the invention and assigned their rights to the Regents or whose interests are owned by the Regents as a matter of policy, law, or contract.

Net Income means any and all consideration, including equity received by the Inventors from the commercialization of a Released Patent (as defined below), less the Inventor’s documented unreimbursed out-of-pocket expenses in the prosecution of the Released Patent and its commercialization.

III. STATEMENT

When the University elects not to file a patent application or to commercialize a patent, it may elect, at its absolute discretion, to release such patent rights to the Inventor(s) (the “Released Patent”). Such release will be made subject to the following conditions:

1. The Released Patent shall be subject to any rights that the sponsors of the research (that led to the invention relating to the Released Patent) may have. Patent rights related to an invention supported by a federal funding agency may not be released by the University directly to the Inventors and, as such, this Procedure will apply subject to the federal funding agency’s release of such Released Patent.
2. The Inventor(s) must have disclosed to the University all material facts pertaining to the Released Patent and its commercial potential.
3. Each of the Inventors shall agree, in writing, to assignment of title in the Released Patent to her/his co-inventors and relinquish any rights they may have to income received by the University pursuant to Paragraph 6(b) below.
4. The Inventor(s) shall agree, in writing, that no further research or development of the invention related to the Released Patent may be conducted using any support, services, or facilities of the University.
5. The Regents expressly reserves the right to: (a) use the Released Patent and associated technology for educational and research purposes, to perform research sponsored by commercial entities, and

to perform clinical research and diagnostic and prognostic services; (b) publicly disclose research results; and (c) allow other non-profit and academic institutions to use the Released Patent and associated technology for the same purposes as all of the foregoing.

6. If the Released Patent is commercialized by the Inventor(s), the relevant Inventor(s) shall:
 - a. Reimburse the University for its out-of-pocket expenses relating to the Released Patent on a pro rata basis in view of the amount the Inventor(s) spent in pursuing patenting the Released Patent; and
 - b. Pay to the University twenty percent (20%) of all Net Income received by the Inventor(s) from such commercialization, which the campus will redistribute per UCLA Procedure 955.2; provided however, in cases of equity UCLA shall not be entitled to receive more than five percent (5%) of the issued shared capital of the licensee.

IV. REFERENCES

1. University of California Patent Policy;
2. University of California Business & Finance Bulletin G-40 Patent Program;
3. UCLA Procedure 955.2, Distribution of the University's General Pool and Research Share Portions of Net Royalties.

Issuing Officer

/s/ Roger Wakimoto

Vice Chancellor for Research

Questions concerning this policy or procedure should be referred to
The Responsible Department listed at the top of this document.

Evidence & Evidentiary Exhibit 8 – Denial of IP Rights Release by UCLA TDG Vice Chancellor Amir Naiberg

AN Naiberg, Amir
Your email from April 18, 2025
To: HKG90@icloud.com, h4723269@gmail.com, Cc: Arora, Chaitanji
[Details](#)

Siri found new contact info: Amir Naiberg amir.naiberg@tdg.ucla.edu [add](#)

Dear Harout,
After considering your request, the University will not assign to you any IP rights.

Thank you,

Amir Naiberg
Associate Vice Chancellor, CEO & President
UCLA Technology Development Group
10889 Wilshire Blvd, Suite 920
Los Angeles, CA 90095
Email amir.naiberg@tdg.ucla.edu



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

Exhibit 9 – Reagents Policy 5105: Policy on Innovation Transfer and Entrepreneurship

UNIVERSITY OF CALIFORNIA Board of Regents

About	Regents Policy 5105: Policy on Innovation Transfer & Entrepreneurship
Members and Advisors	Approved May 13, 2023
Officers	Amended September 22, 2023
Committees	
Regents Emerit <i>s</i>	
Upcoming Meetings:	
Past Meetings:	
Public Comment	
Minutes	
Governance	
Bylaws	
Committee Charters	
Standing Orders	
Regents Policies	
Contact	
Home	

Regents Policy 5105: Policy on Innovation Transfer & Entrepreneurship

Approved May 13, 2023

Amended September 22, 2023

POLICY SUMMARY/BACKGROUND:

This policy is in response to the findings and recommendations formed by the Regents Working Group on Innovation Transfer and Entrepreneurship from December 2009 to April 2023.

The purpose of this policy is to ensure that the University's innovation transfer and entrepreneurship programs - at both the campus and systemwide levels - achieve the following objectives:

- Promote the translation of UC's discoveries into useful products, services, and innovations that not only provide value to individuals and society, but also endeavor to uplift the human condition;
- Inspire the passion of our faculty and student inventors, as well as provide the problem-solving and collaborative support necessary to translate these ideas into real-world solutions having societal benefit; and
- Pursue fair value for our intellectual property so UC can continue to grow its excellence in scholarship, research, and global impact.

POLICY TEXT

A. Governance

The responsibility, authority, and accountability for innovation transfer and entrepreneurship shall reside generally with the campuses. Those campuses with defined strategies, as well as adequate programmatic infrastructure and internal controls, will have the authority and flexibility necessary to execute its charge.

The Office of the President shall continue to play an important role in facilitating the success of UC's innovation transfer enterprise by supporting and facilitating the execution of campus-based strategies and solutions. Its highest and best value comes in leveraging the power and potential of its ten campuses and its perform services no-one campus can cost effectively do on its own, as well as coordinating or addressing multi-campus needs.

B. Funding

The University shall endeavor to provide or raise funds to provide seed capital for early stage development and nascent innovations that have market potential to help the University meet its mission, as identified above.

C. Policy

The University shall periodically review, update and modernize those policies which are core to governing its innovation transfer and entrepreneurship enterprise, as necessary, but no

less than every five years.

To support and facilitate transactions and relationships between the University, its inventors, and industry partners, the University shall harmonize and - to the extent reasonable - consolidate university policies¹ regarding intellectual property, innovation-derived equity, and industry sponsored research to ensure coordinated and streamlined interfaces between the university, its inventors, and industry.

To promote and encourage the successful expansion of engagement between UC inventors and private industry, as well as prevent against real or perceived conflicts of interest, the University shall promulgate effective and appropriate policies to support these relationships.

To present and manage risks-of-unrest or incorrect interpretation or enforcement of these policies, with the University of California Office of the President, in consultation with its campuses and national laboratories, shall provide accompanying guidance, examples, explanations, and resources that shall be timely and relevant and that can inform the understanding of its users and stakeholders, both within and external to the University. The University shall convene a practice group to keep these supporting resources current and applicable to evolving risk cases.

II. Culture / Reputation
With input from both internal and external stakeholders, the University shall take actions to create an environment encouraging and valuing translational research, innovation, and entrepreneurship on par with other UC enterprises and fields of scholarship and research.

Starting in Academic Year 2021-24, a Regents Innovation Awards program to recognize and celebrate exceptional in-UC innovation and entrepreneurship shall be established with the following objectives:

- To challenge the UC community of students, faculty, and researchers to solve the world's most pressing challenges through use-inspired research, critically responsible entrepreneurship, and the translation of academic-based research into real-world solutions having societal benefit;
- To acknowledge UC inventors and entrepreneurs who have demonstrated an exceptional spirit of innovation through the creation of new technologies, products, and services aimed at uplifting the human condition;
- To promote a culture of innovation that makes the person of the UC community to rigorously pursue academic discovery for the purpose of creating practical solutions serving the needs of our global society.

E. Innovation Management System

The University shall endeavor to operate and maintain a state-of-the-art Innovation Management System to handle the IT infrastructure needs of its innovation transfer enterprise, including, at a minimum:

- Marketing and business development;
- Patent Prosecution;
- Intellectual property tracking and management;

- Accounting, billing, and revenue distribution; and
- Stakeholder and client relationship management.

F. Measuring and Reporting Performance and Public Impact

The University shall measure and report on the following:

- Annually or biannually, there shall be a performance and impact review comprised of the following elements:
 - an annual measure of key transactional activities, and
 - a biannual measure of participation rates by women, persons of color, and other groups that have been historically marginalized in use-based research, innovation transfer, and start-up company formation.
- The University shall include in its annual technology commercialization report a showcase of products, services, and start-up companies that exemplify the breadth and value of UC's innovation enterprise, with an emphasis on how they improve societal well-being, provide economic benefit to the region, state, and nation, and demonstrate participation by historically marginalized populations.
- An innovation spotlight focused on a select theme, topic, or area of innovation that highlights the University's efforts and leadership role in creating, refining, or advancing solutions in an area of major public interest.
- Every five years, the University shall commission an economic analysis measuring some or all of the following types of economic impacts resulting from UC innovation transfer and entrepreneurship: job creation, tax revenues, regional economic development in the communities surrounding each UC campus, philanthropic giving to UC spurred by innovation and entrepreneurship activity, and faculty postdoctoral fellow, and student recruitment and retention.

The University shall use these data and reports to periodically update its innovation transfer and entrepreneurship goals.

¹Policies include, but are not limited to, those governing patents, copyrights, equity, industry-sponsored research, conflicts of interest, and conflicts of commitment.

REPORTING

The Office of the President shall provide an annual written report detailing progress, successes, failures, and barriers to implementation for each of the areas under Policy Text.

RELATED DOCUMENTS

Report of the Regents Working Group on Innovation Transfer and Entrepreneurship

A. Conceptual Framework for Defining and Measuring the Value of UC's Innovation and Entrepreneurship Enterprise

Regents Innovation Awards

**Evidence & Evidentiary Exhibit 10 – Protected Disclosure from Gulessarian to Shelly Frohrip
(April 1, 2025, Email)**

 **Harout Gulessarian** April 1, 2025 at 4:45 PM
Follow-up on Reasonable Accommodation and Potential Lab Closure Details
To: Shelly Frohrip, Bcc: Harout Gulessarian

Dear Shelly,

I hope this message finds you well.

I want to bring to your attention a significant issue regarding my current position and some new information I received. It appears that Dr. Micevych's lab is likely to close down in June 2025. A colleague essentially informed me that the department has already planned for this transition, with my colleague being assigned a role into another lab, one of which my colleague will move to once Dr. Paul Micevych's lab closes. If this information is confirmed, as I am sure you understand, it raises valid concerns about the viability of my current transitional reasonable accommodation role at this instant lab; at least, until UCLA identifies a more permanent role with appropriate reasonable accommodations for me.

Given that my position in Dr. Micevych's lab was set up to meet my reasonable accommodations request on a temporary basis (so as to finally remove me from the extremely hostile work environment in the Novitch/Butler labs), the potential closure of this instant lab warrants consideration of relocating my accommodations request to a more stable and enduring work environment—arguably one that will provide a long-term, viable job and career growth opportunities, as we previously discussed.

Additionally, the issues as they stand align with concerns about CAO Mark Lucas potentially placing me in a non-advancing role, indirectly achieving what his department was not able to do directly. With existing evidence and ongoing investigations, this might indicate a larger pattern of retaliatory harassment and discrimination aimed at facilitating my unlawful termination, especially in light of my reasonable accommodations situation at UCLA coupled with other related complaints.

Consequently, this new information necessitates a re-evaluation of alternative reasonable accommodation options; possibly identifying a more permanent and viable lab or more permanent workspace at UCLA. Given the potential closure of this lab, I certainly believe that it would be wise for me to request that UCLA act promptly under the circumstances so as to ensure a stable placement.

I wanted to keep you informed of these developments, as they continue to raise concerns about the future of my role and the reasonable accommodations process. Please let me know if you can clarify these details through other appropriate channels as the related departmental matters continue.

Thank you, Shelly, for your time and attention to these matters. Your support is greatly appreciated.

Kind regards,
Harout K. Gulessarian

**Evidence & Evidentiary Exhibit 11 Protected disclosure from Gulesserian to Shelly Frohrip emails
4/23/2025 and 5/2/25**

A



Harout Gulesserian

Re: accommodations request for interview
To: Frohrip, Shelly

April 23, 2025 at 4:04 PM



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

Dear Shelly,

Thank you for your recent message regarding the accommodations related to the upcoming interview and the support person request. I appreciate your coordination with Adriana Ovalle-Stevenson to ensure my needs are taken into account, and I acknowledge the accommodations currently proposed. However, I must respectfully clarify that several key components of my reasonable accommodation request have not yet been addressed. These include but are not limited to:

1. **Advance Access to Interview Questions** – I have requested that all interview questions be provided to me at least seven (7) days in advance. This is a necessary accommodation that allows me time to process the questions appropriately and provide complete and considered responses in light of my documented disability and the ongoing psychological toll this matter has had.
2. **Written Format for Responses** – If advance questions are not provided, I respectfully request to provide all responses in writing during the course of the interview/investigation. This is both a reasonable and necessary accommodation and is also a right I expressly reserve.

These are essential accommodations that must be honored in full to allow for meaningful participation in any investigative process. They are not simply preferences, but medically and legally justified requirements under the Americans with Disabilities Act (ADA) and California Fair Employment and Housing Act (FEHA). Additionally, and critically, I must inform you that I received a paycheck today that was short by approximately \$1,200, despite having completed a full 80-hour pay period. Instead, I was only paid for 16 hours of work, totaling around \$300, when I should have received roughly \$1,500. I raised this issue via email last week, yet received no response, and no correction has been made. This latest payroll issue—following a documented pattern of timesheet alterations, lockouts, and nonpayment—continues to materially and negatively impact my employment terms and financial well-being at UCLA.

This is not an isolated event, but part of a long-standing and escalating pattern of **retaliation, discrimination, exclusion, and administrative misconduct among many other things**, which has intensified since I began engaging in protected activity—including requests for reasonable healthcare accommodations and honest disclosures regarding unlawful conduct. As I previously shared with you, these actions include being excluded from collaborative opportunities, subject to system manipulation, and facing derogatory treatment. I continue to uncover new evidence daily that only further supports the seriousness of these concerns. None of the issues I've raised should be considered waived or resolved, and I reserve all rights without limitation.

Additionally, I must bring to your attention a troubling and now verifiable incident involving my timesheets—one which underscores the systematic manipulation I have faced and the ongoing harm to my employment at UCLA. As you may recall, back in March I attempted to contact Helen via email (with you BCC'd), but the message bounced back with an automated response instructing me to contact Mark Lucas. I then emailed Mr. Lucas and CC'd you in that correspondence. Mr. Lucas responded in writing stating that Mr. Lucas would unlock the timesheet so that I could input my hours for that pay period myself. When I logged in, I discovered that Helen Nguyen (Department HR rep) had already uploaded 75.25 hours on my behalf, which I reviewed and approved in good faith, believing them to reflect what was worked. However, after I approved the timesheet, Mr. Mark Lucas re-entered the system, unapproved it, and added more hours than I had originally worked or reviewed—without my consent or knowledge.

This action not only altered an official document after my approval, but likely was intended to wrongfully create the appearance that I personally added fraudulent hours, when in fact I did not. I now have evidence confirming this timeline and these alterations, and it raises serious concerns about both retaliation and potential manipulation of employment records.

Further compounding the issue, my paycheck received today is approximately \$1,200 short. I worked a full 80-hour period but was only paid for 16 hours, despite having raised this issue via email last week. That message has gone unanswered. To make matters worse, I have discovered that my upcoming paycheck for the period ending on the 26th is already locked, preventing me from adding the hours I worked. This is an egregious continuation of a harmful pattern that materially and negatively impacts my employment terms, financial stability, and overall well-being. MY sick and vacation hours also end up not tallying because of this error again materially and negatively impacting my employment terms at UCLA.

It is important to note that the same individuals responsible for manipulating UCLA's LOAN systems and locking me out during my FMLA leave (to which I raised my concerns and complaints about) appear to be the same individuals now interfering with my timesheets and continuing to cause unnecessary and targeted harm which was reported to DPO back in May 2024. This demonstrates a sustained, retaliatory pattern that requires immediate and independent investigation.

This message serves as both a formal reiteration of my outstanding accommodation needs and a renewed notice that retaliation and harm persist. I ask for your prompt acknowledgment and a commitment that these specific, outstanding accommodations will be implemented. Furthermore, the continuing negative material impact on my employment demands that a formal investigation be initiated without further delay, based on the totality of evidence already in hand per UCLA Policy should be enough to start formal proceedings. Vice Chancellor Krause was able to open a formal investigation into my matters as the evidence provided was substantial to prove wrongdoings existed and continue to exist, respectfully the same should concepts should be applied with all other offices that intend to work on this case and follow UCLA's own policies.

Thank you for your continued time and attention to this urgent and deeply concerning matter Shelly. I remain available for further communication and to provide any documentation as needed. Please see below the attached evidence to yet again prove another wrongdoing by some of the individuals involved.

Kindly,
Harout Gulesserian

B



Harout Gulessarian
To: Shelly Frohrip >

Re: Ongoing issues

Hi Shelly,

Thank you for your time and for assisting me — I truly appreciate your help over the phone today during our conversation.

I wanted to share the screenshot of the message I received (attached below) indicating to go home, as I'm unclear about whether I'm expected to report to work before Tuesday or not as I am paid hourly. I would really appreciate some clarification on this as I'm sitting in front of the lab currently (attached below) and will do so until 5:00 PM.

Regarding the interview with Nico for the potential investigation, I want to ensure that I am provided with all relevant questions and given ample, unrestricted time to review and prepare my responses thoroughly. Additionally, as mentioned to you, I request unlimited time to read any memorandums or documents first to Nico related to the investigation, so that I can respond accurately and completely with ample time given among other things. It's important to me that this process is handled fairly and transparently for processing questions and being able to have a meaningful opportunity to be heard.

I also want to express how frustrating and disheartening this entire situation has been. I feel that I have been mistreated throughout this entire process from the respondents, and have been completely isolated, especially regarding the way the Neurobiology department has handled this situation among others. I had hoped for a smoother and more respectful experience as all of the department seemed to have prior knowledge, motive, intent, and pattern of behavior towards me when I exercised my rights, and these individual's continue their bad faith acts towards me to this day which have and continue to have a material and negative impact on my employment

5/2/25

I also want to express how frustrating and disheartening this entire situation has been. I feel that I have been mistreated throughout this entire process from the respondents, and have been completely isolated, especially regarding the way the Neurobiology department has handled this situation among others. I had hoped for a smoother and more respectful experience as all of the department seemed to have prior knowledge, motive, intent, and pattern of behavior towards me when I exercised my rights, and these individual's continue their bad faith acts towards me to this day which have and continue to have a material and negative impact on my employment terms at UCLA without limitations. Hopefully UCLA can resolve these issues accordingly and in a timely manner.

As always, I appreciate your time (Especially for taking my call during your busy schedule today), for your continued assistance, your honesty, and valuable insights Shelly; all are greatly appreciated and valued.

Kindly,
Harout Gulessarian

This is me sitting in the hallway next to CHS 60-054



On May 2, 2025, at 10:01, Harout Gulessarian <hkg90@icloud.com> wrote:

Hi Shelly,

Thank you for reaching out.

At this time, I'm unable to confirm whether I can step out of the lab for a call on Friday at 10:30 AM, as I am currently working in what feels like a hostile environment. I do not know who I am supposed to speak with or get permission from to attend a call like this, and I'm genuinely unsure how to proceed. I spend 8 hours a day alone in the lab with zero tasks, period.

Earlier today, I shared with Angela how isolating and discriminatory the environment has become—particularly the way I'm being treated and positioned within the workspace, including conduct like eye-rolling or being placed in a corner with no tasks, if I ask a question it is met with frustration, If I say hello I don't get a response but if another individual speaks they respond happily, basically these conducts feel

Evidence & Evidentiary Exhibit 12 – UC Patent and Intellectual Property (IP) Agreements

University of California Patent/IP Acknowledgment

I acknowledge that the Policy on Inventions, Patents, and Innovation Transfer ("the Policy") applies to me.

1. I hereby assign University IP (as defined in the Policy) to the University.
2. I will promptly disclose all Inventions (as defined in the Policy) to my local authorized licensing office and will provide to the University all documents necessary for obtaining legal protection for University IP and entering into commercialization agreements.
3. I acknowledge that I am responsible for ensuring that any employment/consulting agreements I enter into with third parties do not conflict with my preexisting and ongoing obligations to the University and that any agreements I enter into relating to University IP are subordinate to my obligations under the Policy and this Patent/IP Acknowledgment.

A copy of the Policy can be found here: <http://policy.ucop.edu/doc/2500493/PatentPolicy>. The University agrees that I have no obligation to assign any Intellectual Property qualifying fully under the provisions of [Cal. Labor Code § 2870](#).

Signature

Date

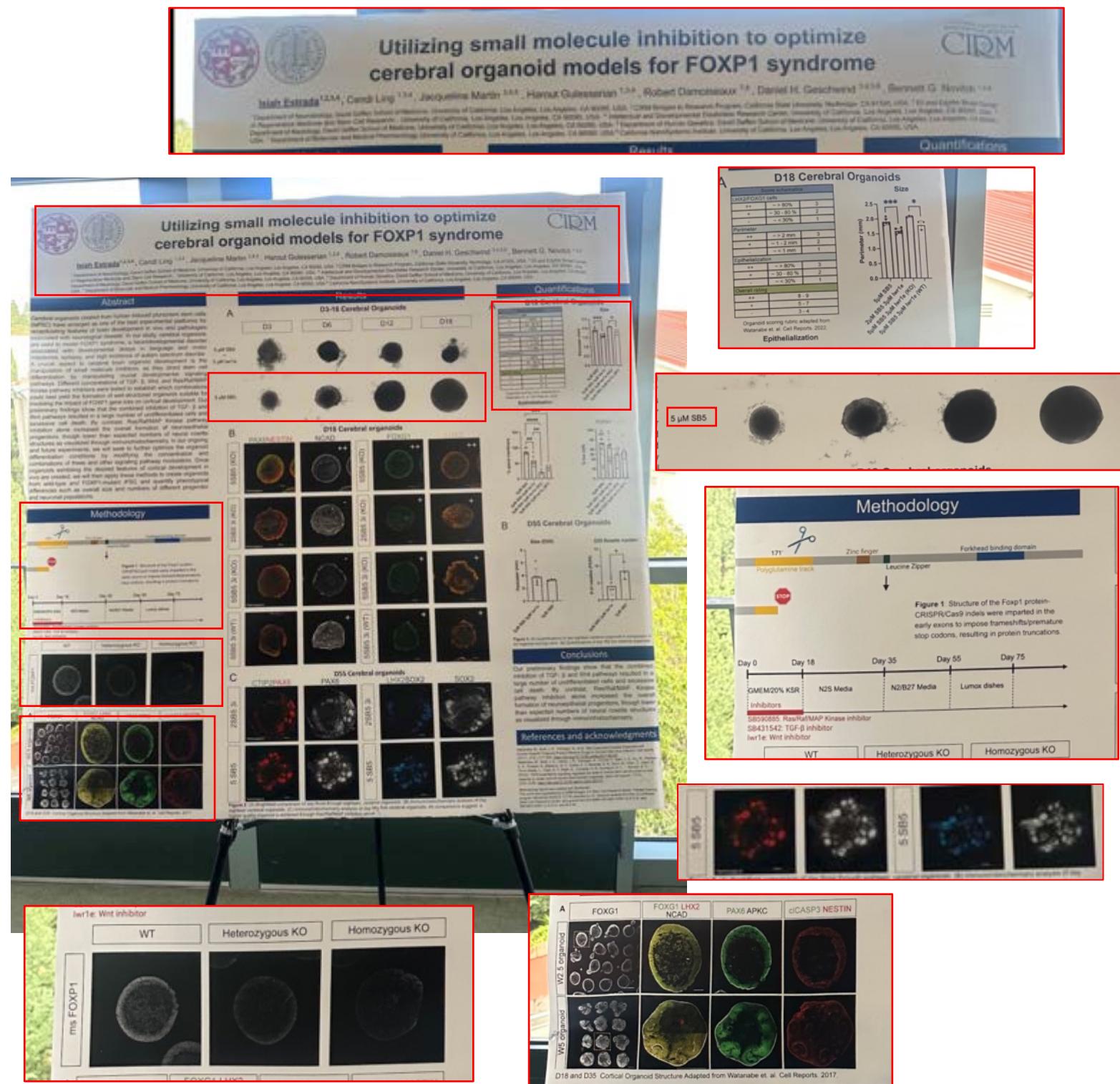
Name (Print)

Department

	UNIVERSITY OF CALIFORNIA STATE OATH OF ALLEGIANCE, PATENT POLICY, AND PATENT ACKNOWLEDGMENT	EMPLOYEE'S NAME (Last, First, Middle Initial)	DATE PREPARED
	UPAY585 (R 11/2011) E0420 71443-180	Gullessarian, Harout	McDermott 4/28/22
		EMPLOYEE ID 505876880	DEPARTMENT Neurobiology
			EMPLOYMENT DATE McDermott 4/28/22
STATE OATH OF ALLEGIANCE I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States and the Constitution of the State of California against all enemies, foreign and domestic; that I will bear true faith and allegiance to the Constitution of the United States and the Constitution of the State of California; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will bear faithfully the duties upon which I am about to enter.			
Taken and subscribed before me on: <u>4/28/22</u> Signature of Authorized Official: <u>Sarah Lourad</u> Title: <u>HR Analyst</u> County: <u>LA</u> State: <u>CA</u>		Signature of Officer or Employee:  (Do not sign until in the presence of proper witness.)	
NOTE: No fee may be charged for administering this oath.			
<p>WHO MUST SIGN THE OATH: All persons (other than aliens) employed by the University, in common with all other California public employees, whether with or without compensation, must sign the oath. (Calif. Constitution, Article XX, Section 2, Calif. Gov. Code Sections 3100-3102.)</p> <p>All persons re-employed by the University after a termination of service must sign a new Oath if the date of re-employment is more than one year after the date on which the previous Oath was signed (Calif. Gov. Code Sec. 3102.)</p> <p>WHEN OATH MUST BE SIGNED: The Oath must be signed BEFORE the individual enters upon the duties of employment (Calif. Constitution, Article XX, Section 3; Calif. Gov. Code Sec. 3102.)</p>			
<p>PATENT ACKNOWLEDGMENT</p> <p>This acknowledgment is made by me to The Regents of the University of California, a corporation, hereinafter called "University," in part consideration of my employment, and of wages and/or salary to be paid to me during any period of my employment, by University, and/or my utilization of University research facilities and/or my receipt of gift, grant, or contract research funds through the University.</p> <p>By execution of this acknowledgment, I understand that I am not waiving any rights to a percentage of royalty payments received by University, as set forth in the University of California Patent Policy, hereinafter called "Policy."</p> <p>I also understand and acknowledge that the University has the right to change the Policy from time to time, including the percentage of net royalties paid to inventors, and that the policy in effect at the time an invention is disclosed shall govern the University's disposition of royalties, if any, from that invention.</p> <p>Further, I acknowledge that the percentage of net royalties paid to inventors is derived only from consideration in the form of money or equity received under: 1) a license or bailment agreement for licensed rights; or 2) an option or letter agreement leading to a license or bailment agreement. I also acknowledge that the percentage of net royalties paid to inventors is not derived from research funds or from any other consideration of any kind received by the University. The Policy on Accepting Equity When Licensing University Technology governs the treatment of equity received in consideration for a license.</p> <p>I acknowledge my obligation to assign, and do hereby assign, inventions and patents that I conceive or develop: 1) within the course and scope of my University employment while employed by University, 2) during the course of my utilization of any University research facilities, or 3) through any connection with my use of gift, grant, or contract research funds received through the University. I further acknowledge my obligation to promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the University authorized licensing office. Such inventions shall be examined by the University to determine rights and equities therein.</p> <p>NOTICE: This acknowledgment does not apply to an invention which qualifies under the provision of Calif. Labor Code Sec. 2870 which provides that (a) Any provision in an employment agreement which provides that an employee shall assign, or offer to assign, any of his or her rights in an invention to his or her employer shall not apply to an invention that the employee developed entirely on his or her own time without using the employer's equipment, supplies, facilities, or trade secret information except for those inventions that either: (1) Relate at the time of conception or reduction to practice of the invention to the employer's business, or actual or demonstrably anticipated research or development of the employer; or (2) Result from any work performed by the employee for the employer. (b) To the extent a provision in an employment agreement purports to require an employee to assign an invention otherwise excluded from being required to be assigned under subdivision (a), the provision is against the public policy of this state and is unenforceable. In any suit or action arising under this law, the burden of proof shall be on the individual claiming the benefits of its provisions.</p>			
RETENTION: Accounting: 5 years after separation, except in cases of disability, retirement or disciplinary action, in which case retain until age 70.		Employee/Guest Name (Please print): <u>Harout Gullessarian</u>	
Other Copies: 0-5 years after separation		Employee/Guest Signature:  Date: <u>6/28/2022</u>	
		Witness Signature & University Acceptance:  Date: <u>4/28/22</u>	

PLEASE SIGN STATE OATH AND PATENT ACKNOWLEDGMENT

Bennett Novitch, in association with the consortium, purposefully disguised the discovery by intentionally changing the narrative, misrepresenting Gulessarian's contributions and merging multiple distinct research protocols into a single, misleading presentation. This deliberate attempt to disguise the true origin and authorship appears intended to foreclose the rightful property interests of the federal government under the Bayh-Dole Act, the State of California, and, without limitation, UCLA's interests in patentable or trade secret intellectual property. This conduct constitutes a violation of agreements with the NIH, along with UCLA Reagents Policy 5105 and further contradicts the institutional values and objectives outlined by Provost Michael T. Brown, Ph.D. (see Exhibits 6 and 9 and Bayh-Dole Act)



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



Federal Laws on Research Misconduct without limitations

1. Office of Research Integrity (ORI) Policies:

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

2. Federal Regulations (42 CFR Part 93):

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

3. National Science Foundation (NSF) Misconduct Policies:

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

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

• 35 U.S.C. § 200:

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

• 35 U.S.C. § 201:

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

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

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

California State Laws on Research Misconduct

1. California Education Code § 66600:

- Addresses fraud in obtaining research grants and provides for penalties.

2. California Penal Code § 632:

- Criminalizes certain forms of fraud related to research funding and grants.



Evidence & Evidentiary Exhibit 14 – Patent Agreement Contract Signed by Gulessarian and Material Impact on Employment Terms

This exhibit includes the **Patent Agreement Contract** signed by Gulessarian, highlighting the following statement regarding employment benefits and privileges:

"Inventor shares paid to University employees pursuant to this paragraph represent an employee benefit."

This clause further emphasizes the entitlement to certain benefits, including inventor credit, shares, and privileges as part of Gulessarian's employment under university policy among others.

Origin of intent to commit fraud

The image shows two screenshots of mobile phone messages. The left message is from 'BENNETT NOVITCH' (BN) to 'Harout Gulessarian'. It is dated 10/2/23 and has a subject line 'Re: SB'. The message body discusses the idea of publishing a protocol related to B-Raf signaling and mentions several inhibitors like MEK, ERK, PD98059, and PD133901. It also links to a paper from 2022. The right message is a reply to 'SB' with 3 messages. It says 'Probably we should wait until we see how well these methods reproduce, but happy to talk about laying out some of the analysis above.' Below it, another message from 'SB' states: 'The one factor I'm not yet sure of is how to introduce the use of SB-590885. Calling it a mistake does not add confidence, and it would be better to come up with some rationale based on other experiments like the idea that suppression of FGF-MEK signaling helps with organoids. This may take some crafting of a suitable narrative.'

BN BENNETT NOVITCH ● 10/2/23
To: Harout Gulessarian >

Re: SB

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

1. Are the effects of SB-590885 related to B-Raf signaling, or something else? This would entail testing other inhibitors of B-Raf, as well as downstream effectors of B-Raf including MEK (via MEK/ERK inhibitors like PD98059 and PD133901), or maybe something upstream like FGF receptor inhibitors like PD-173074. There was a paper that came out in 2022 arguing that treatment of feeder-free hPSC with PD-173074 can allow feeder-free cells to make organoids (<https://www.ncbi.nlm.nih.gov/pmc/articles/32589-0042122101512-2.pdf>). But all of the prior experiments have focused on adding inhibitors to the undifferentiated hPSC, not during the organoid formation steps.

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

I would not engage on 1 except to see about how SB-590885 compares to SB-431542, but for 2, you might want to think about collecting some measurements at different time points for both RNA

3 Messages SB Back ^ v

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

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

Material Impact on Employment Terms Due to Misconduct

Dr. Novitch materially affected the terms of Gulesserian's employment by intentionally directing or encouraging actions that resulted in violations of **federal and state laws, UCLA Policy, along with UC Reagents policy 5105 without limitation**, thereby also constituting a violation of the **Bayh-Dole Act**. This misconduct not only jeopardized institutional compliance but also placed Gulesserian at professional and legal risk without his informed consent.

<p>BN BENNETT NOVITCH To: Natella Cc: Harout ></p>	4/13/24	
<p>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.</p> <p>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.</p> <p>Harout, this whole business about "the patent" is driving me nuts. A lot of work and contributions from people in the lab before you have gone into these methods, and I thus view our methods as the collective wisdom and property of the lab. Anyone working in our group should have access to that knowledge and the reagents needed. Please give the information that Natella, Cendi, and anyone else who is struggling with their organoid experiments need to see if what you've</p>		<p>BN BENNETT NOVITCH 4/15/24 To: Harout Cc: Mark ></p> <p>Hi Harout,</p> <p>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.</p> <p>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.</p> <p>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</p>

	UNIVERSITY OF CALIFORNIA STATE OATH OF ALLEGIANCE, PATENT POLICY, AND PATENT ACKNOWLEDGMENT	EMPLOYEE'S NAME (Last, First, Middle Initial) <i>Gulseserian, Harout</i>	DATE PREPARED Mo/Dy/Yr <i>4/28/22</i>
	UPAY585 (R 11/2011) E0420 71443-180	EMPLOYEE ID <i>505976880</i>	DEPARTMENT <i>Neurobiology</i>
<p>STATE OATH OF ALLEGIANCE I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States and the Constitution of the State of California against all enemies, foreign and domestic; that I will bear true faith and allegiance to the Constitution of the United States and the Constitution of the State of California; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties upon which I am about to enter.</p> <p>Taken and subscribed before me on: <i>4/28/22</i></p> <p>Signature of Authorized Official: <i>Sybil Lewand</i></p> <p>Title: <i>HR Analyst</i></p> <p>County: <i>LA</i></p> <p>State: <i>CA</i></p> <p>Signature of Officer or Employee: <i>[Handwritten Signature]</i></p> <p>(Do not sign until in the presence of proper witness.)</p> <p>NOTE: No fee may be charged for administering this oath.</p>			
<p>The oath must be administered by either (1) a person having general authority by law to administer oaths—for example, Notaries Public, Civil Executive Officers (Gov. Code Sec. 1001), Judicial Officers, Justices of the Peace, and county officials named in Gov. Code Sections 24000, 24057, such as, district attorneys, sheriffs, county clerks, members of boards of supervisors, etc., or (2) by any University Officer or employee who has been authorized in writing by The Regents to administer such oaths.</p> <p>WHO MUST SIGN THE OATH: All persons (other than aliens) employed by the University, in common with all other California public employees, whether with or without compensation, must sign the oath. (Calif. Constitution, Article XX, Section 2; Calif. Gov. Code Sections 3100-3102.)</p> <p>All persons re-employed by the University after a termination of service must sign a new Oath if the date of re-employment is more than one year after the date on which the previous Oath was signed (Calif. Gov. Code Sec. 3102.)</p> <p>WHEN OATH MUST BE SIGNED: The Oath must be signed BEFORE the individual enters upon the duties of employment (Calif. Constitution, Article XX, Section 3; Calif. Gov. Code Sec. 3102.)</p> <p>WHERE OATHS ARE FILED: The Oaths of all employees of the University shall be filed with the Campus Accounting Office.</p> <p>FAILURE TO SIGN OATH: No compensation for service performed prior to his subscribing to the Oath or affirmation may be paid to a University employee. And no reimbursement for expenses incurred may be paid prior to his subscribing to the Oath or affirmation. (Calif. Gov. Code Sec. 3107.)</p> <p>PENALTIES: "Every person who, while taking and subscribing to the Oath or affirmation required by this chapter, states as true any material which he knows to be false, is guilty of perjury, and is punishable by imprisonment in the state prison not less than one or more than 14 years." (Calif. Gov. Code Sec. 3108.)</p>			
<p>PATENT ACKNOWLEDGMENT</p> <p>This acknowledgment is made by me to The Regents of the University of California, a corporation, hereinafter called "University," in part consideration of my employment, and of wages and/or salary to be paid to me during any period of my employment, by University, and/or my utilization of University research facilities and/or my receipt of gift, grant, or contract research funds through the University.</p> <p>By execution of this acknowledgment, I understand that I am not waiving any rights to a percentage of royalty payments received by University, as set forth in the University of California Patent Policy, hereinafter called "Policy."</p> <p>I also understand and acknowledge that the University has the right to change the Policy from time to time, including the percentage of net royalties paid to inventors, and that the policy in effect at the time an invention is disclosed shall govern the University's disposition of royalties, if any, from that invention.</p> <p>Further, I acknowledge that the percentage of net royalties paid to inventors is derived only from consideration in the form of money or equity received under: 1) a license or bailment agreement for licensed rights, or 2) an option or letter agreement leading to a license or bailment agreement. I also acknowledge that the percentage of net royalties paid to inventors is not derived from research funds or from any other consideration of any kind received by the University.</p> <p>The Policy on Accepting Equity When Licensing University Technology governs the treatment of equity received in consideration for a license.</p> <p>I acknowledge my obligation to assign, and do hereby assign, inventions and patents that I conceive or develop 1) within the course and scope of my University employment while employed by University, 2) during the course of my utilization of any University research facilities, or 3) through any connection with my use of gift, grant, or contract research funds received through the University. I further acknowledge my obligation to promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the University authorized licensing office. Such inventions shall be examined by the University to determine rights and equities therein in accordance with the Policy. I shall promptly furnish University with complete information with respect to each.</p> <p>In the event any such invention shall be deemed by University to be patentable or protectable by an analogous property right, and University desires, pursuant to determination by University as to its rights and equities therein, to seek patent or analogous protection thereon, I shall execute any documents and do all things necessary, at University's expense, to assign to University all rights, title, and interest therein and to assist University in securing patent or analogous protection thereon. The scope of this provision is limited by Calif. Labor Code Sec. 2870, to which notice is given below. In the event I protest the University's determination regarding any rights or interest in an invention, I acknowledge my obligation: (a) to proceed with any University requested assignment or assistance; (b) to give University notice of that protest no later than the execution date of any of the above-described documents or assignment; and (c) to reimburse University for all expenses and costs it encounters in its patent application attempts, if any such protest is subsequently sustained or agreed to.</p> <p>I acknowledge that I am bound to do all things necessary to enable University to perform its obligations to grantors of funds for research or contracting agencies as said obligations have been undertaken by University.</p> <p>University may relinquish to me all or a part of its right to any such invention, if, in its judgment, the criteria set forth in the Policy have been met.</p> <p>I acknowledge that I am bound during any periods of employment by University or for any period during which I conceive or develop any invention during the course of my utilization of any University research facilities, or any gift, grant, or contract research funds received through the University.</p> <p>In signing this acknowledgment, I understand that the law, of which notification is given below, applies to me, and that I am still required to disclose all my inventions to the University.</p>			
<p>NOTICE: This acknowledgment does not apply to an invention which qualifies under the provision of Calif. Labor Code Sec. 2870 which provides that (a) Any provision in an employment agreement which provides that an employee shall assign, or offer to assign, any of his or her rights in an invention to his or her employer shall not apply to an invention that the employee developed entirely on his or her own time without using the employer's equipment, supplies, facilities, or trade secret information except for those inventions that either: (1) Relate at the time of conception or reduction to practice of the invention to the employer's business, or actual or demonstrably anticipated research or development of the employer; or (2) Result from any work performed by the employee for the employer. (b) To the extent a provision in an employment agreement purports to require an employee to assign an invention otherwise excluded from being required to be assigned under subdivision (a), the provision is against the public policy of this state and is unenforceable. In any suit or action arising under this law, the burden of proof shall be on the individual claiming the benefits of its provisions.</p>			
RETENTION: Accounting: 5 years after separation, except in cases of disability, retirement or disciplinary action, in which case retain until age 70.	Employee/Guest Name (Please print): <i>Harout Gulseserian</i>	Employee/Guest Signature: <i>[Handwritten Signature]</i>	Date: <i>6/28/2022</i>
Other Copies: 6-8 years after separation	Witness Signature & University Acceptance: <i>Sybil Lewand</i>	Date: <i>4/28/22</i>	

PLEASE SIGN STATE OATH AND PATENT ACKNOWLEDGMENT

UNIVERSITY OF CALIFORNIA PATENT POLICY—October 1, 1997

I. PREAMBLE

It is the intent of the President of the University of California, in administering intellectual property rights for the public benefit, to encourage and assist members of the faculty, staff, and others associated with the University in the use of the patent system with respect to their discoveries and inventions in a manner that is equitable to all parties involved.

The University recognizes the need for and desirability of encouraging the broad utilization of the results of University research, not only by scholars but also in practical application for the general public benefit, and acknowledges the importance of the patent system in bringing innovative research findings to practical application.

Within the University, innovative research findings often give rise to patentable inventions as fortuitous by-products, even though the research was conducted for the primary purpose of gaining new knowledge. The following University of California Patent Policy is adopted to encourage the practical application of University research for the broad public benefit; to appraise and determine relative rights and equities of all parties concerned; to facilitate patent applications, licensing, and the equitable distribution of royalties, if any; to assist in obtaining funds for research; to provide for the use of invention-related income for the further support of research and education; and to provide a uniform procedure in patent matters when the University has a right or equity.

II. STATEMENT OF POLICY

A. An agreement to assign inventions and patents to the University, except those resulting from permissible consulting activities without use of University facilities, shall be mandatory for all employees, for persons not employed by the University but who use University research facilities, and for those who receive gift, grant, or contract funds through the University. Such an agreement may be in the form of an acknowledgment of obligation to assign. Exemptions from such agreements to assign may be authorized in those circumstances when the mission of the University is better served by such action, provided that overriding obligations to other parties are met and such exemptions are not inconsistent with other University policies.

B. Those individuals who have so agreed to assign inventions and patents shall promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the Office of Technology Transfer or authorized licensing office. They shall execute such declarations, assignments, or other documents as may be necessary in the course of invention evaluation, patent prosecution, or protection of patent or analogous property rights, to assure that title in such inventions shall be held by the University or by such other parties designated by the University as may be appropriate under the circumstances. Such circumstances would include, but not be limited to, those situations when there are overriding patent obligations of the University arising from gifts, grants, contracts, or other agreements with outside organizations.

In the absence of overriding obligations to outside sponsors of research, the University may release patent rights to the inventor in those circumstances when:

1. the University elects not to file a patent application and the inventor is prepared to do so, or
2. the equity of the situation clearly indicates such release should be given, provided in either case that no further research or development to develop that invention will be conducted involving University support or facilities, and provided further that a shop-right is granted to the University.

C. Subject to restrictions arising from overriding obligations of the University pursuant to gifts, grants, contracts, or other agreements with outside organizations, the University agrees, following said assignment of inventions and patent rights, to pay annually to the named inventor(s), or to the inventor(s)' heirs, successors, or assigns, 35% of the net royalties and fees per invention received by the University. An additional 15% of net royalties and fees per invention shall be allocated for research-related purposes on the inventor's campus or Laboratory. Net royalties are defined as gross royalties and fees, less the costs of patenting, protecting, and preserving patent and related property rights, maintaining patents, the licensing of patent and related property rights, and such other costs, taxes, or reimbursements as may be necessary or required by law.

Inventor shares paid to University employees pursuant to this paragraph

represent an employee benefit. When there are two or more inventors, each inventor shall share equity in the inventor's share of royalties, unless all inventors previously have agreed in writing to a different distribution of such share.

Distribution of the inventor's share of royalties shall be made annually in November from the amount received during the previous fiscal year ending June 30th, except as provided for in Section II.D. below. In the event of any litigation, actual or imminent, or any other action to protect patent rights, the University may withhold distribution and impound royalties until resolution of the matter.

D. The DOE Laboratories may establish separate royalty distribution formulas, subject to approval by the President. Distribution of the inventor's share of DOE Laboratory royalties shall be made annually in February from the amount received during the previous fiscal year ending September 30th. All other elements of this policy shall continue to apply.

E. Equity received by the University in licensing transactions, whether in the form of stock or any other instrument conveying ownership interest in a corporation, shall be distributed in accordance with the Policy on Accepting Equity When Licensing University Technology.

F. In the disposition of any net income accruing to the University from patents, first consideration shall be given to the support of research.

III. PATENT RESPONSIBILITIES AND ADMINISTRATION

A. Pursuant to Regents' Standing Order 100.4(m), the President has responsibility for all matters relating to patents in which the University of California is in any way concerned. This policy is an exercise of that responsibility, and the President may make changes to any part of this policy from time to time, including the percentage of net royalties paid to inventors.

B. The President is advised on such matters by the Technology Transfer Advisory Committee (TTAC), which is chaired by the Senior Vice President—Business and Finance. The membership of TTAC includes the Provost and Senior Vice President—Academic Affairs, the Director of the Office of Technology Transfer, and representatives from the campuses, DOE Laboratories, Academic Senate, the Division of Agriculture and Natural Resources and the Office of the General Counsel. TTAC is responsible for:

1. Reviewing and proposing University policy on intellectual property matters including patents, copyrights, trademarks, and tangible research products;
2. Reviewing the administration of intellectual property operations to ensure consistent application of policy and effective progress toward program objectives; and
3. Advising the President on related matters as requested.

C. The Senior Vice President—Business and Finance is responsible for implementation of this Policy, including the following:

1. Evaluating inventions and discoveries for patentability, as well as scientific merit and practical application, and requesting the filing and prosecution of patent applications.
2. Evaluating the patent or analogous property rights or equities held by the University in an invention, and negotiating agreements with cooperating organizations, if any, with respect to such rights or equities.
3. Negotiating licenses and license option agreements with other parties concerning patent and/or analogous property rights held by the University.
4. Directing and arranging for the collection and appropriate distribution of royalties and fees.
5. Assisting University officers in negotiating agreements with cooperating organizations concerning prospective rights to patentable inventions or discoveries made as a result of research carried out under gifts, grants, contracts, or other agreements to be funded in whole or in part by such cooperating organizations, and negotiating with Federal agencies regarding the disposition of patent rights.
6. Approving exceptions from the agreement to assign inventions and patents to the University as required by Section II.A. above.
7. Approving exemptions to University policy on intellectual property matters including patents, copyrights, trademarks, and tangible research products.

PLEASE SIGN THE STATE OATH and PATENT ACKNOWLEDGEMENT on page 1

Evidence & Evidentiary Exhibit 15 – Gulessarian contacts DPO about the potential respondents retaliating without limitations (5/23/2024, email), and how UCLA systems were being manipulated.

From: Harout Gulessarian <HKG90@icloud.com>

Sent: Thursday, May 23, 2024 4:55 PM

To: UCLAHealth-HR@mednet.ucla.edu; LOATeam@mednet.ucla.edu; uclahealthemployeerelations@mednet.ucla.edu; Discrimination Prevention Office <dpo@conet.ucla.edu>

Subject: Harout Gulessarian Case # HPRC001037 2024-05-0263

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,
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. Manlafac 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 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.

Evidence & Evidentiary Exhibit 16 – Alleged administrative misconduct by Mark Lucas time sheet fabrication sent to Shelly Frohrip

Example 1 without limitations:

Message sent to Helen on 2/28/2025 that I am having timesheet issues



Helen's email bounced stated to email Mark Lucas which I did below



Mr. Mark Lucas responded and stated "For the current pay period, I have "unapproved" so that you can fill out the time below yourself." Telling me to fill out the timesheet myself.

When I went to upload my hours on the timesheet I saw that Helen was able to upload the proper hours and that I had approved those hours 75.25 hours to be exact on 3/3/2025 at 7:12 AM. On 3/3/2025 at 3:29pm Mark Lucas unapproved my timesheet and altered the hours inserted. One can see that I approve and unproved the timesheet because my eye was able to catch Mark Lucas trying to manipulate the system again by locking me out and altering the data.

(UCLA ID: 505876880 UCPATH ID: 10582324)		
Timesheet Action Audit for Pay Period Ending on 03/01/2025		
Action Type	User	Action Date
Timesheet Approved	MICEVYCH,PAUL E*	3/5/2025 10:35:19 AM
Completion Removed	GULESSERIAN,HAROUT KARNIK	3/4/2025 7:31:36 PM
Timesheet Completed	GULESSERIAN,HAROUT KARNIK	3/4/2025 7:31:26 PM
Record Updated	LUCAS,MARK T	3/3/2025 3:30:22 PM
Record Updated	LUCAS,MARK T	3/3/2025 3:29:53 PM
Completion Removed	LUCAS,MARK T	3/3/2025 3:29:53 PM
Timesheet Completed	GULESSERIAN,HAROUT KARNIK	3/3/2025 7:12:44 AM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:11:54 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:11:35 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:10:56 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:10:22 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:10:22 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:08:00 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:06:13 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:05:38 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:05:06 PM
Record Inserted	NGUYEN,HELEN	3/1/2025 6:03:53 PM
Approval Removed	LUCAS,MARK T	3/1/2025 8:52:00 AM
Approval Removed	LUCAS,MARK T	3/1/2025 8:51:42 AM
Timesheet Approved	NOVITCH,BENNETT G*	2/20/2025 9:04:36 AM
Record Inserted	HOLIDAY AUTOPOP	2/16/2025 12:56:58 AM

Evidence & Evidentiary Exhibit 17A – Unanswered Email to Helen (March 18, 2025) - No Response for 20 Days

Harout Gulessarian
HG
Harout Gulessarian Paycheck Discrepancies
To: Helen A. Nguyen, Cc: Shelly Frohrip
March 18, 2025 at 8:48 AM
[Details](#)

Hi Helen,

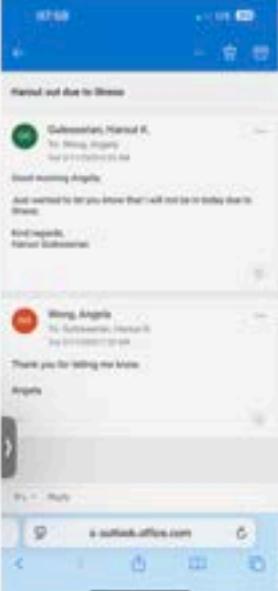
I hope you're doing well. I wanted to bring a couple of issues to your attention regarding my recent timesheets and paychecks.

1. In my last paid out paycheck, I noticed that I was overpaid. I worked 75.25 hours (See original email I had sent to you), but the total was altered to ~79 hours without me making any changes from my end.
2. For the current timesheet that was submitted, it shows regular hours for the 11th of March, but I was actually sick that day and used my sick hours (See image below).

Could you please help in resolving these discrepancies if possible? Thank you for your time and assistance; they are appreciated.

Kind regards,

Harout Gulessarian



Evidence & Evidentiary Exhibit 17B: See PDEH FMLA Write Up for Previous Patterns of Behavior

Evidence & Evidentiary ***Exhibit 18 – Gulessarian Emails Shelly Regarding Novitch’s Physical Hostility and Aggressive Behavior***

HG

Harout Gulessarian

Harout Gulessarian incident

To: Shelly Frohrip

February 10, 2025 at 1:49 PM

Hi Shelly,

I am writing to urgently bring to your attention an ongoing and escalating issue with my supervisor, Bennett Novitch. I was once again threatened by Ben and have had to step away from the hostile environment. There are numerous witnesses to this incident in the tissue culture room. This time, Bennett Novitch tried to provoke me physically, saying "Bring it on" while clenching his fist. This appears to be part of a never-ending cycle of abuse directed at me for not waiving my rights to the novel discovery.

As you're aware, the department has been of no help in addressing this situation. I am at a point where I feel unsafe and unable to continue working in this environment. This is a cry for immediate help. I am reaching out because I need support to ensure my safety and well-being, both physically and emotionally. If possible, I would appreciate any guidance or intervention to address this toxic situation. I do not want to be in that lab area as I do not want to get punched.

I can't work in this lab setting any longer and would like to be allowed to work remotely until the transfer goes through. Your attention to this matter would be greatly appreciated.

Kind regards,

Harout Gulessarian

Evidence & Evidentiary Exhibit 19 – Consortium's Intent, Motive, and Knowledge: Pattern of Behavior Identifying Potential Additional Respondents for Investigation

Please refer to exhibit 37 for a complete analysis on the consortium's involvement in this fraudulent scheme as it will further identify further respondents who should also be investigated for their acts to defraud the government. Also see attached notes that go along with Exhibits 37 that further break down the elements of fraud.

11/6/2023 Jacqueline Martin

The screenshot shows a Microsoft Word document with the title "SSPyGEM Team Meeting". The content includes a bulleted list of tasks under sections like "Protocol Updates" and "Agenda". A red box highlights the following task:

- Plans for standardization/making the protocol automatable - Robert/Mike/Aparna
 - Updates to the current **organoid** **protocol** - Claudia/Harout
 - Harout will send out his SB protocol for replication in Bhaduri Lab.

11/15/2023 Dan Geschwind and Bennett Novitch + Consortium PI exposed discovery to NIMH

2D & 3D Modeling

KOLF2.2J iPSC

Day 18

Day 18

Day 18

Day 18

Day 18

Day 18

Novitch Lab

Acknowledgements

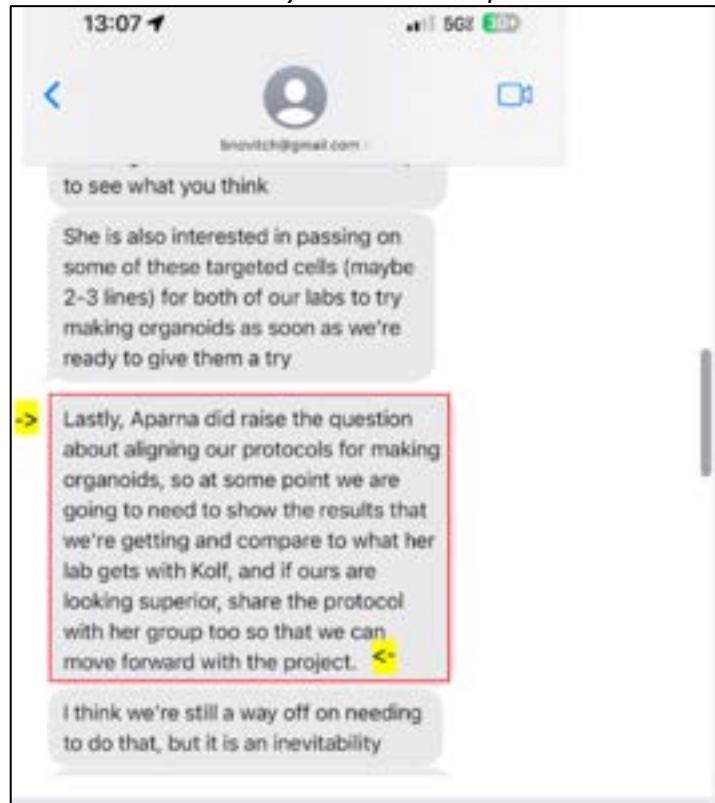
Novitch Lab:
Bennett Novitch
Hovnat Galustyan
Domelevo Lab:
Robert Domelevo
Constance Yuen
Aida Vargas
Aherami Lab:
Daniel Ahorai
Hamid Chomi
Michael F. Wells
Yoshuka Komte

Bhaduri Lab:
Asraze Bhaduri
Claudia Nguyen
Eloisa Fazzari
Dana Arzad
Matthew Li
Reyman Golshani
Yan Jin
Peter Kim
Diana Are
Hyukseong Cho
Jong-jin Kim

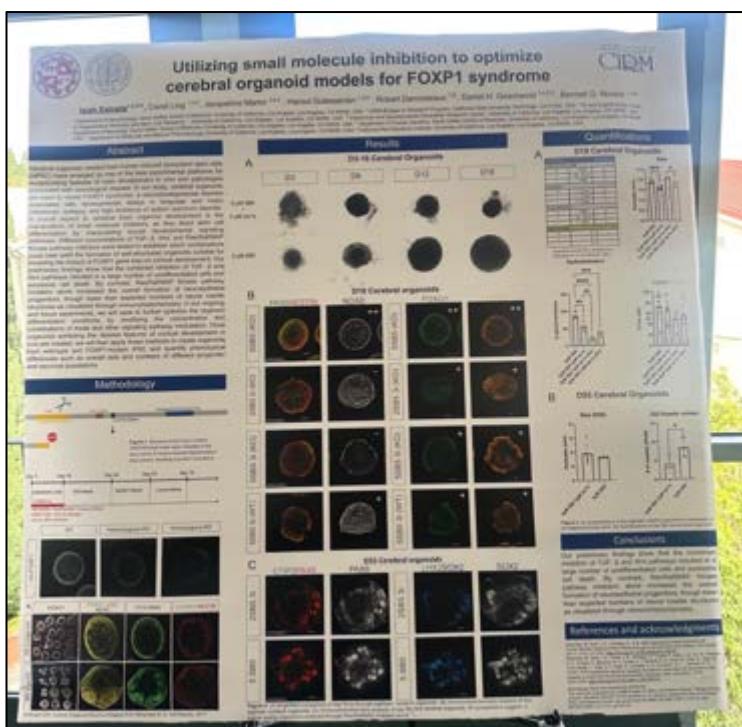
Lise Lab:
Chengyuan Lise
Geschwind Lab:
Daniel Geschwind
Kevin Wojta
Jacqueline Martin

Scimed USA UCLA Tissue

2/5/2024 Bennett Novitch insists Gulesserian shares protocol with Bhaduri (Bhaduri has her protocol submitted to TDG at this time already; this is Novitch's attempt to make Gulesserian waive his rights; reminder Bhaduri's name was used to obtain the lucrative grant and also Bhaduri is omitted from the poster strategically; basically any of the PI's part of the organoid team who received a grant was strategically left off the authors list on the fabricated poster that was presented on or about February 7 2025 to the public with no TDG protection.



2/7/2025 Poster disguising Gulesserian's novel discovery. Contributing members including Jacqueline Martin, Dan Geschwind, and Robert Damoiseaux omitting Bhaduri strategically.



Evidence & Evidentiary Exhibit 20 – Aparna Bhaduri Submits Her Protocol to UCLA TDG

This exhibit documents Aparna Bhaduri's submission of her protocol to UCLA's Technology Development Group (TDG)—the same individual Dr. Bennett Novitch previously encouraged Gulesserian to disclose his invention to Bhaduri, prior to any formal IP protection by TDG.

The screenshot shows a web browser displaying the UCLA Technology Development Group (TDG) website. The URL in the address bar is ucla.technologypublisher.com/technology/54448. The page content is as follows:

Human Glioblastoma Model (UCLA Case No. 2023-273/2024-151)

UCLA RESEARCHERS & INNOVATORS **INDUSTRY & INVESTORS** **NEWS & EVENTS** **ABOUT** **CONCIERGE**

Download as PDF

For More Information:
Tariq Arif
Business Development Officer
tariq.arif@tdg.ucla.edu

Inventors:
Aparna Bhaduri

Categories:
Therapeutics > CNS and Neurology
Therapeutics > Oncology

UCLA researchers in the Department of Biological Chemistry have developed a novel method to study glioblastoma using human brain organoids.

BACKGROUND: The National Institutes of Health defines glioblastoma as the most malignant and pervasive subtype of glioma, or glial-based cancer, and report that it is the most common primary brain tumor in adults. Glioblastomas are an aggressive cancer form that often recur after surgery. Glioblastoma cells can migrate through brain tissue to distant regions outside of the tumor. The current methods for studying glioblastomas need to be improved in order to develop novel and more efficacious clinical treatment options.

INNOVATION: UCLA researchers led by Dr. Aparna Bhaduri have developed a novel method to improve the efficiency with which primary cancer cells can directly be incorporated into brain organoids in order to study glioblastomas. Organoids offer a venue to study cancer cells *in vitro* in a 3D culture where certain aspects of the natural *in vivo* tumor environment can be recapitulated. This novel model would allow novel discoveries of glioblastomas.

POTENTIAL APPLICATIONS:

- Studying mechanisms of glioblastoma growth and cell migration.
- Testing novel glioblastoma treatments.

ADVANTAGES:

Evidence & Evidentiary **Exhibit 21 – Novitch Denies Gulessarian Access to TDG for Patent Disclosure**

This exhibit documents Dr. Bennett Novitch's denial of Gulessarian's opportunity to present a highly patentable, novel accidental discovery to UCLA's Technology Development Group (TDG)—the very same path taken by Aparna Bhaduri, as shown in Exhibit 20. Despite the invention's clear potential, Gulessarian's rights under UCLA Policy 5105 were foreclosed by Dr. Novitch and affiliated parties, effectively preventing proper disclosure, evaluation, and protection of intellectual property.

BENNETT NOVITCH

Re: Delays

To: Natella Baliaouri, Cc: Harout Gulessarian

April 13, 2024 at 12:36 AM

[Details](#)

Siri found new contact info Bennett Novitch bnovitch@g.ucla.edu [add...](#) [\(x\)](#)

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

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

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

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

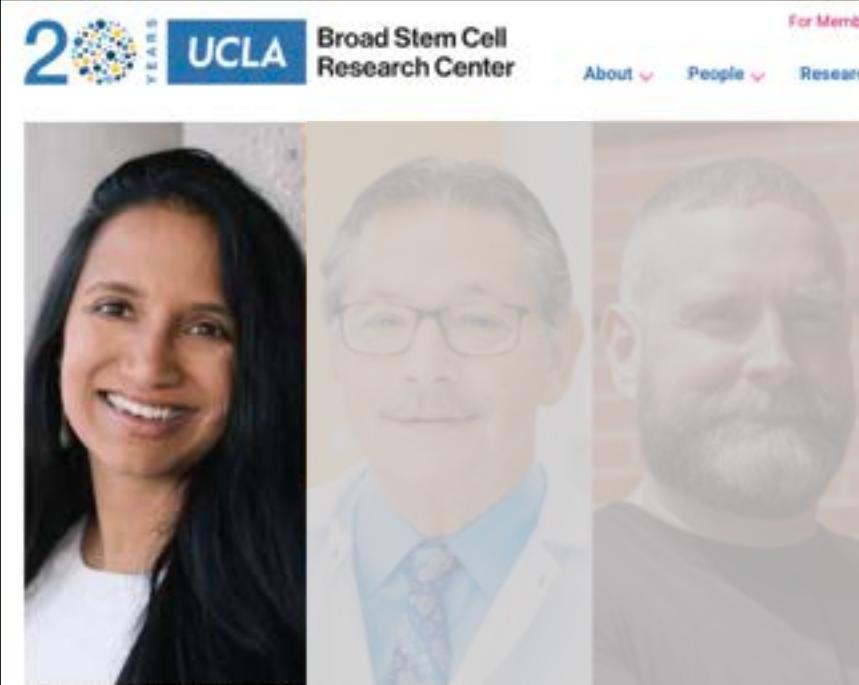
I would like to meet with both of you to discuss this further and make sure that we're all on the same page. Will Tuesday at 9am work for you?

Ben

[See More from NATELLA VAHKTANGOVNA BALIAOURI](#)

Evidence & Evidentiary Exhibit 22 – \$10.3 Million Grant Awarded to Consortium Group which Intended on Misusing Undisclosed Discovery

This exhibit documents the \$10.3 million grant awarded to the consortium group, which intended to use Gulessarian's discovery without proper disclosure to UCLA's Technology Development Group (TDG) or other required institutional channels.



From left to right: Aparna Bhaduri, Ph.D., Donald Kohn, M.D. and Roger Hollis, Ph.D.

UCLA scientists awarded \$21.8 million in CIRM grants to advance novel stem-cell based therapies

By Linda Wang | Jan 30, 2025 [Award & Funding](#)

Scientists at the Eli and Edythe Broad Center of Regenerative Medicine and Stem Cell Research at UCLA have received \$21.8 million in grants from the California Institute for Regenerative Medicine, the state's stem cell agency, to develop and advance new stem cell-based treatments for neuropsychiatric disorders, a blood disorder and a neurodevelopmental condition.

[Dr. Aparna Bhaduri](#), assistant professor of biological chemistry

Uncovering therapeutic targets for neuropsychiatric disorders

Bhaduri's \$10.3 million [foundational research award](#) will support her work to uncover metabolic drivers of neuropsychiatric disorders. One in five people in the U.S. experience a neuropsychiatric disorder, with many cases starting in adolescence. Current treatments focus on managing symptoms, but there's an urgent need to develop more effective therapies to address the root biological causes of these disorders. This project aims to fill this gap by investigating the role of metabolism in human brain development and neuropsychiatric disorders at key developmental stages.

Bhaduri and collaborators will use stem cell-derived 3D brain organoid models grown from samples from patients with schizophrenia and autism spectrum disorder to compare how metabolism drives development in a healthy versus disrupted environment. The team, comprised of UCLA, UCSF and UCSC experts in metabolism, computational biology and neurodevelopmental disorders, has also created an innovative technological framework that models neurovascular interactions and has the flexibility to mix and match neural and vascular cells from control or affected individuals — a system that will help pinpoint which cell types are affected by these conditions and how. This work immediately paves the way for innovative, targeted therapies that include dietary interventions and new drugs to transform care.

Evidence & Evidentiary Exhibit 23 – Gulessarian’s protected disclosure to Shelly Frohrrip

A

HG Harout Gulessarian
Ongoing issues
To: Shelly Frohrrip

April 29, 2025 at 3:12 PM

Dear Shelly,

I wanted to inform you that, once again, I was unable to log my hours (144 hours from the last two paycheck's). This ongoing issue is causing continued harm and distress among many other things. I am not here to work for free or to starve as a human (I would like to see how these individuals would respond if the roles were reversed—if they were the ones who didn't receive their vacation/sick hours paid during FMLA (6-8 weeks), or had 144 out of 160 hours withheld, or were subjected to intentional system alterations that made them appear fraudulent among many other issues. These are the same individuals who previously acted in bad faith retaliation by withholding my pay among other things and are now retaliating against me for my protected disclosures again by manipulating the systems among other things.).

The intent behind transferring to a new lab from the Novitch/Butler labs was to remove myself from the persistent aggressive hostile work environment as a reasonable healthcare accommodation.

Unfortunately, as I had mentioned previously to you and UCLA collectively, that others in the department among others outside the department are to be considered as respondents, the same pattern of behavior is now continuing in this new setting. Since disclosing my concerns to you, I have been experiencing what I believe to be discriminatory and retaliatory treatment—not only from the department (HR rep Nguyen, and CAO Lucas) but now also from my coworker Angela Wong, who consistently ignores and I mean ignores me completely throughout the day even if I greet them numerous times throughout the day. What is worse is that I am excluded from assignments and opportunities. I feel like a sideline observer rather than a contributing team member. Or better yet thrown in the corner of the Neurobiology department and forgotten about.

When I initially expressed concern that Mark Lucas and subordinate Nguyen placed me in this lab to maintain control over me, I understand there may have been skepticism. However, I've since demonstrated my honesty and good faith, and yet the treatment I am receiving from them has only worsened. This is deeply concerning and unacceptable.

We had agreed back in December 2024 that a transfer to the Lawrence Lab—within a different department and a brand new lab—was the appropriate step to remove me from this kind of treatment. However, it appears that Mark Lucas intervened in that process, effectively placing me back into a situation where the retaliatory and harassing behavior continues during this unethical period. This feels like a direct response to my participation in all protected class activities and disclosures among others.

I also want to note that I have been showing up to work without being given a single task for the past 2–3 weeks nor getting paid. This is not an isolated incident but an ongoing pattern of unacceptable conduct.

While I understand the university personnel's first priority is the university and how to protect the university from legalities, there comes a point where a line must be drawn between what can and cannot be tolerated when it comes to justice and fair treatment of a human being.

Thank you for your time and continued attention to these unfortunate, and intolerable hostile, retaliatory matters I (Harout Gulessarian) continue to experience at UCLA without limitations. These matters continue to materially and negatively impact my employment terms with UCLA among many others issues without limitations.

Kind regards,
Harout Gulessarian

B

HG Harout Gulessarian
Re: Ongoing issues
To: Frohrrip, Shelly

May 2, 2025 at 10:01 AM

Hi Shelly,

Thank you for reaching out.

At this time, I'm unable to confirm whether I can step out of the lab for a call on Friday at 10:30 AM, as I am currently working in what feels like a hostile environment. I do not know who I am supposed to speak with or get permission from to attend a call like this, and I'm genuinely unsure how to proceed. I spend 8 hours a day alone in the lab with zero tasks, period.

Earlier today, I shared with Angela how isolating and discriminatory the environment has become—particularly the way I'm being treated and positioned within the workspace, including conduct like eye-rolling or being placed in a corner with no tasks, if I ask a question it is met with frustration, if I say hello I don't get a response but if another individual speaks they respond happily, basically these conducts feel demeaning and targeted to say the least and its happening everyday.

Given these circumstances, I'm requesting your guidance on how to proceed. I sincerely want to engage with you, but I also want to ensure that I'm protected and supported while doing so.

Also, please kindly provide the details of the accommodations discussed or available in writing, so I have a clear record of what is being offered—I want to ensure I don't forget anything that was said during these intolerable times.

I'm truly disappointed by the ongoing treatment I continue to experience in the Neurobiology Department, which appears to be carried out with clear knowledge, intent, motive, and a sustained pattern of behavior. This situation directly undermines the purpose of the accommodation process, which is meant to remove me from a hostile work environment. Please advise on how to proceed.

Warm regards,
Harout

C HG Harout Gulessarian
Lateral transfer for Harout Gulessarian
To: Frohrip, Shelly

May 7, 2025 at 7:59 AM

Dear Shelly,

I hope this message finds you well. I am writing to inform you of recent developments in the lab that have significantly outlined harms, impacted my well-being, and now require your immediate attention—requesting your assistance in facilitating a reasonable accommodation lateral transfer, among other matters.

Over the past few days, the following events have transpired:

Meeting with Dr. Micevych May 6, 2025 11:00 AM: I met with Dr. Micevych, who advised me to contact your office to arrange a transfer to a different department, specifically the Lawrence lab. This move would ensure that I no longer have to work in proximity to Angela, and especially Mark Lucas and Helen Nguyen, whose actions, as evidenced, have been and continue to be intentionally harmful to me, with numerous attempts to essentially achieve unlawful termination indirectly due to their discriminatory animus toward my protected classes, among other issues. Dr. Micevych also confirmed that the current position in his lab was made available by Mark Lucas, not him.

Retaliatory Conduct Recognized: Dr. Paul Micevych has acknowledged the discriminatory and retaliatory conduct and actions of Angela, Helen, and Mark Lucas, among others, which have contributed to and continue to create an unsending hostile work environment in a retaliatory manner. Furthermore, this recognition highlights the pattern of behavior by bad actors that continues to adversely, materially, and negatively impact my employment and maintain an ongoing deleterious effect on my ability to work effectively, causing considerable distress and damages, without limitations.

False Allegations Addressed: As part of what appears to be a broader scheme, Dr. Micevych clarified that he had been misinformed by Angela regarding my performance and conduct in the lab—obviously intentionally, and with knowledge and motive. Moreover, Dr. Micevych confirmed that the allegations regarding incomplete training and the necessity for me to generate my own protocols were unfounded and essentially fabricated.

Assurance from Dr. Micevych : Dr. Micevych has assured me that I will not face termination and that compensation will be processed promptly. He also clarified that he was not responsible for certain administrative actions, such as locking me out of the timesheet system even though his name was being used for those actions. It was then confirmed that he was not the one responding to my emails (the individual who was responding would respond only to administrative issues and not scientific). Dr. Micevych was also appalled at the fact that I have not been paid for my hours worked (144 hours) and all of the misinformation that was being presented to him. Once again, a pattern of administrative misconduct seemingly existed (reported to DPO since May 2024) and continues to persist presently.

Letter of Recommendation: Dr. Micevych expressed his appreciation for my contributions and has offered to provide a letter of recommendation to support my future endeavors.

Given these circumstances, I am currently out of the lab and seeking a reasonable accommodation to continue the transition to a different department to remedy the ongoing harms at minimum. I kindly request your assistance in facilitating this ongoing transition process to ensure a safe and supportive work environment, among other things.

Please let me know the next steps and any information or documentation you require from me to proceed.

As always, I appreciate your help and thank you for your attention to these matters.

Sincerely,
Harout Gulessarian

D

Frohrip, Shelly May 7, 2025 at 9:13 AM
RE: Lateral transfer for Harout Gulessarian

To: Harout Gulessarian

Hi Harout,

I received information about your pay. Here are the steps that need to be taken today for the pay period 3/30/25-4/12/25:

1. Complete the attached paper timecard, reporting your hours worked for the pay period 3/30/25-4/12/25
2. Forward the completed timecard to Dr. Micevych for his signature
3. Send signed timecard to Helen so she can process

I will be back in touch regarding your accommodation request for a lateral transfer.

Thanks,
Shelly

Shelly Frohrip
Employee Disability Management Services-Program Manager
Insurance and Risk Management
UCLA Office of the Vice Chancellor & Chief Financial Officer
(424) 259-5242

UCLA Office of the Vice Chancellor & Chief Financial Officer

[See More from Harout Gulessarian](#)

Blank ppe Bi-Weekly...eet.xls

E

Harout Gulessarian May 7, 2025 at 2:23 PM
Re: Ongoing issues

To: Shelly Frohrip

Hi Shelly,

Thank you for your time and for assisting me — I truly appreciate your help over the phone today during our conversation.

I wanted to share the screenshot of the message I received (attached below) indicating to go home, as I'm unclear about whether I'm expected to report to work before Tuesday or not as I am paid hourly. I would really appreciate some clarification on this as I'm sitting in front of the lab currently (attached below) and will do so until 5:00 PM.

Regarding the interview with Nico for the potential investigation, I want to ensure that I am provided with all relevant questions and given ample, unrestricted time to review and prepare my responses thoroughly. Additionally, as mentioned to you, I request unlimited time to read any memorandums or documents first to Nico related to the investigation, so that I can respond accurately and completely with ample time given among other things. It's important to me that this process is handled fairly and transparently for processing questions and being able to have a meaningful opportunity to be heard.

I also want to express how frustrating and disheartening this entire situation has been. I feel that I have been mistreated throughout this entire process from the respondents, and have been completely isolated, especially regarding the way the Neurobiology department has handled this situation among others. I had hoped for a smoother and more respectful experience as all of the department seemed to have prior knowledge, motive, intent, and pattern of behavior towards me when I exercised my rights, and these individuals continue their bad faith acts towards me to this day which have and continue to have a material and negative impact on my employment terms at UCLA without limitations. Hopefully UCLA can resolve these issues accordingly and in a timely manner.

As always, I appreciate your time (Especially for taking my call during your busy schedule today), for your continued assistance, your honesty, and valuable insights Shelly; all are greatly appreciated and valued.

Kindly,
Harout Gulessarian

Photo by user: jessica on Flickr. Used under Creative Commons license.

F

SF
Frohrip, Shelly
RE: Ongoing issues
To: Harout Gulesserian

May 2, 2025 at 3:10 PM

Hi Harout,

I received the following information about your pay:

From: Lucas, Mark MLucas@mednet.ucla.edu
Sent: Friday, May 2, 2025 3:03 PM
To: Samuels, Joshua jamsu83@mednet.ucla.edu; Frohrip, Shelly sfrohri@im.ucla.edu
Subject: RE: Harout Gulesserian "sent home" today

He will be paid in full for this time.

Shelly Frohrip
Employee Disability Management Services-Program Manager
Insurance and Risk Management
UCLA Office of the Vice Chancellor & Chief Financial Officer
(424) 259-5242

UCLA Office of the Vice Chancellor
& Chief Financial Officer

From: Harout Gulesserian <hkg90@icloud.com>
Sent: Friday, May 2, 2025 2:23 PM
To: Frohrip, Shelly <sfrohri@im.ucla.edu>
Subject: Re: Ongoing issues

Hi Shelly,

Thank you for your time and for assisting me — I truly appreciate your help over the phone today during our conversation.
I wanted to share the screenshot of the message I received (attached below) indicating to go home, as I'm unclear about whether I'm expected to report to work before Tuesday or not as I am paid hourly. I would really appreciate some clarification on this as I'm sitting in front of the lab currently (attached below) and will do so until 5:00 PM.
Regarding the interview with Nico for the potential investigation, I want to ensure that I am provided with all relevant questions and given ample, unrestricted time to review and prepare my responses thoroughly. Additionally, as mentioned to you, I request unlimited time to read any memorandums or documents first

Evidence & Evidentiary Exhibit 24 – Continued Payroll Obstruction and Lack of Response from Helen (April 8, 2025)

This exhibit documents an email sent by Gulessarian to Helen Nguyen on April 8, 2025, which went unanswered for 20 days, until Shelly Frohrip intervened by contacting the department. This delay is part of an ongoing pattern of administrative negligence in which Gulessarian was repeatedly omitted from receiving full or timely payments for hours worked.

In the last two consecutive pay periods alone, approximately 90% of Gulessarian's earned pay was withheld (144/160 hours worked), despite compliance with reporting requirements. Compounding the issue, respondents would contact Gulessarian on Saturday mornings, requesting him to complete timesheets while knowing he was already locked out of the system, making compliance impossible and furthering the material harm to Gulessarian.

As a result of these delays and obstructions, Gulessarian was also prevented from properly accruing sick and vacation hours, forcing him to miss or reschedule essential medical appointments during an already difficult period on numerous occasions.

The screenshot shows an email inbox with the following messages:

- Harout Gulessarian** (Sent: March 18, 2025 at 8:48 AM)
Subject: Harout Gulessarian Paycheck Discrepancies
To: Helen A. Nguyen, Shelly Frohrip
Details
Hi Helen,
I hope you're doing well. I wanted to bring a couple of issues to your attention regarding my recent timesheets and paychecks.
1. In my last paid out paycheck, I noticed that it was overpaid. I worked 75.25 hours (See original email I had sent to you, but the total was altered to -79 hours without me making any changes from my end).
2. For the current timesheet that was submitted, it shows regular hours for the 11th of March, but I was actually sick that day and used my sick hours (See Image below).
Could you please help in resolving these discrepancies if possible? Thank you for your time and assistance, they are appreciated.
Kind regards,
Harout Gulessarian
- Nguyen, Helen A.** (Sent: April 8, 2025 at 10:15 AM)
Subject: RE: Harout Gulessarian Paycheck Discrepancies
To: Harout Gulessarian
Details
Hi Harout,
I hope you are feeling better today! Thank you for your patience. For your timesheet on the day you were not in (3/11/25), would you like to use your sick leave to cover 3/11/25? In addition, I would like to check in with you to see how you are doing! Do you have any questions or concerns? I want to ensure you have an optimal environment.
I did see in a previous email that you had 2 days of PTO in February (2/1/25 and 2/1/25), have you been paid those days?
Best Regards,
Helen Nguyen, (She/Her/Hers)
Human Resources Analyst
Department of Neurology
Department of Computational Medicine
David Geffen School of Medicine at UCLA
(310) 825-8409
- 6 Messages** (Sent: 3/18/25)
Back
Harout Gulessarian
Hi Helen, I hope you're doing well. I want...
Helen A. Nguyen
Hi Harout, I hope you are feeling better tod...
Helen A. Nguyen
Hi Harout, I am following up on this to ensu...
Helen A. Nguyen
Hi Harout, I am following up on this as I ha...
Helen A. Nguyen
Hi Harout, I am following up on this as I ha...
Helen A. Nguyen
To: Harout Gulessarian
RE: Harout Gulessarian Paycheck Discrepancies
Hi Harout,
I am following up about your hours. Since I have not received a response from you yet, no further action will be taken on my end unless otherwise noted.
Best Regards,
Helen Nguyen (She/Her/Hers)

Evidence & Evidentiary Exhibit 25 – Payroll Control by Respondents Helen Nguyen and Mark Lucas

This exhibit identifies Helen Nguyen and Mark Lucas as the individuals responsible for processing payroll within the Neurobiology department. As payroll administrators, they hold full access and control over timesheet processing, including decisions regarding what gets submitted, when, and whether it is processed in a timely manner.

Their dual roles as HR and administrative personnel—while also acting as key figures in the payroll system—raise serious concerns about conflicts of interest and further reinforce evidence of intentional misconduct or gross negligence. This centralized control underscores their ability to influence or obstruct Guesserian's pay, regardless of whether they acted jointly, separately, or with deliberate disregard for institutional obligations.

PAYROLL PROCESSORS' CONTACT LIST			
DEPARTMENT	PAYROLL PROCESSOR	E-MAIL	PHONE
ADMIN	HARRIS,SIMONE A.	SHarris@mednet.ucla.edu	310-825-7336
ANEST	BOLANOS,MONICA E. OLIVO,PATSY G. FERNANDEZ,SANDRA	MBolanos@mednet.ucla.edu Polivo@mednet.ucla.edu sandrafernandez@mednet.ucla.edu	310-206-6158 310-206-6158
BIOCHEM	CHIONG,STACEY SERRANO,KRISTAL LUTFI,ISSA PHAN,BRIAN	SChiong@mednet.ucla.edu KDSerrano@mednet.ucla.edu ilutfi@mednet.ucla.edu bphan@mednet.ucla.edu	310-825-4625 310-206-0920 310-825-4625
BRI	SERRANO,KRISTAL CHIONG,STACEY LUTFI,ISSA KEH,JEROME	AElias@mednet.ucla.edu SChiong@mednet.ucla.edu ilutfi@mednet.ucla.edu jkeh@mednet.ucla.edu	310-825-4625 310-206-0920 310-206-4709
BROAD STEM CELL RESEARCH CENTER (BSCRC) JONSSON COMP. CANCER CENTER (JCCC)	RODRIGUEZ,NANCY L. FLAMER,MARSHA	Nancyrodriguez@mednet.ucla.edu MFlamer@mednet.ucla.edu	310-825-9571
COMPUTATIONAL MEDICINE	LUCAS,MARK T. NGUYEN,HELEN A.	MLucas@mednet.ucla.edu helennguyen@mednet.ucla.edu	310-825-9552 424-440-3429
CRC	RUBIN,KARENA	Karenarubin@mednet.ucla.edu	805-428-6207
DEAN'S OFFICE	RUBIN,KARENA	Karenarubin@mednet.ucla.edu	805-428-6207
DOM (Department Of Medicine)	MENDIOLA,VERNIE VINLUAN HARRIS,SIMONE A.	vmendiola@mednet.ucla.edu sharris@mednet.ucla.edu	310.486.8339 310.429.4902
EMERG	OLIVO,PATSY G. BOLANOS,MONICA E. FERNANDEZ,SANDRA SKIBO,DAVID CASSIDY,JENNIFER	POlivo@mednet.ucla.edu MBolanos@mednet.ucla.edu sandrafernandez@mednet.ucla.edu dskibo@mednet.ucla.edu jmcassidy@mednet.ucla.edu	310-206-6158
FACP	MARTINEZ,FRANCISCO MCINTOSH,KIMBERLY WARD,ARNETA	FMartinez@mednet.ucla.edu KFMclntosh@mednet.ucla.edu ArnetaWard@mednet.ucla.edu	310-301-5308 310-301-5200 310-721-8790
FAMMED	BOLANOS, MONICA FERNANDEZ,SANDRA PARAY,ELIZABETH THAN,CHRISTINE BARAJAS,ANABEL OLIVO,PATSY G.	MBolanos@mednet.ucla.edu sandrafernandez@mednet.ucla.edu eparay@mednet.ucla.edu cstan@mednet.ucla.edu anabelbarajas@mednet.ucla.edu POlivo@mednet.ucla.edu	310-206-6158
HN	CONTRERAS,ABELINA MIRANDA,ANALESLY ROGAN,TAYLOR ARNOLD,SHAWNTAE MILLER,BETH A	AHContreras@mednet.ucla.edu analeslymiranda@mednet.ucla.edu trogan@mednet.ucla.edu shawntaearnold@mednet.ucla.edu bamiller@mednet.ucla.edu	310-794-8567 310-794-5184 310-825-9083 310-301-6800 310-794-2540
HUMGEN	CHIONG,STACEY KEH,JEROME LUTFI,ISSA PHAN,BRIAN	SChiong@mednet.ucla.edu jkeh@mednet.ucla.edu ilutfi@mednet.ucla.edu bphan@mednet.ucla.edu	310-825-4625 310-206-4709 310-206-0920 310-825-4625
NEURO	SLAUGHTER,DALAIH CUMMINGS,LAKIESHA WRIGHT,MONIQUE	dslaughter@mednet.ucla.edu lcummings@mednet.ucla.edu moniquewright@mednet.ucla.edu	310-825-0719 310-825-6016 310-267-2827
NEUROBIO	NGUYEN,HELEN A. LUCAS,MARK	helennguyen@mednet.ucla.edu MLucas@mednet.ucla.edu	424-440-3429 310-825-9552

Evidence & Evidentiary Exhibit 26 – Continuation of Hostile Work Environment and False Information Regarding Conduct

What was intended to be the end of a hostile work environment instead evolved into a continuation of ongoing issues, where Dr. Micevych was repeatedly misinformed about my conduct and activities in the lab. These false reports led to a meeting (May 6th 2025) where my actions and behavior were questioned, forcing me to prove myself innocent every time.

Dr. Micevych would later realize that he had been misled, not seeing the emails I had been sending him. Additionally, Dr. Micevych never instructed Angela to tell me to create my own protocols, as they already existed. However, Angela failed to provide those protocols, subjecting me to disparate treatment and forcing me to suffer through 8-hour workdays under unfair conditions.

It is also important to note that Mark Lucas played a role in influencing Angela's actions. For instance, Mark Lucas

<p> Harout Gulessarian To: pmicevych@mednet.ucla.edu ></p> <p>Dear Dr. Micevych,</p> <p>I hope this message finds you well. I wanted to take a moment to update you on recent developments and express my gratitude for the opportunity to work in the lab.</p> <p>On April 2, 2025, I completed my assignments and was sent home at 3:00 PM. The following day, I arrived at the lab at 7:33 AM but was informed that there were no tasks for me at that time and was asked to return at 2:00 PM for a behavior assay. Today, after finishing my tasks, I sought additional work but was advised that there were no further assignments available.</p> <p>Given these circumstances, I am wondering if it might be possible to utilize my vacation hours to cover the hours when I was sent home early or when no assignments were available. I understand if this isn't feasible, but I'd appreciate any guidance on whether this could be an option.</p> <p>I truly value being part of the lab and the meaningful experiences I am gaining. I am grateful for the support and opportunities you provide. Please let me know your thoughts on this matter.</p> <p>Thank you very much for your time and consideration.</p> <p>Kind regards, Harout Gulessarian</p>	<p>4/4/25</p> <p>Work Assignments</p> <p>GK Gulesserian, Harout K. To: Wong, Angela Thu 4/17/2025 8:36 AM</p> <p>Good morning, Angela,</p> <p>Do I have any tasks or assignments to complete today?</p> <p>Kind regards, Harout Gulesserian</p> <p>WA Wong, Angela Behavior tests (1:45-3) Thu 4/17/2025 8:42 AM</p> <p>GK Gulesserian, Harout K. Ok, thanks for letting me know. Thu 4/17/2025 8:47 AM</p> <p>From: Gulesserian, Harout K. <HGulesserian@mednet.ucla.edu> Sent: Wednesday, April 23, 2025 9:09 AM To: Wong, Angela <AMWong@mednet.ucla.edu> Subject: Any tasks for the day?</p> <p>Good morning, Angela,</p> <p>Do I have any work assignments today?</p> <p>Kind regards, Harout Gulesserian</p>
---	--

From: Wong, Angela <AMWong@mednet.ucla.edu>
Sent: Wednesday, April 23, 2025 9:38 AM
To: Gulesserian, Harout K.
<HGulesserian@mednet.ucla.edu>
Subject: RE: Any tasks for the day?



Harout Gulessarian

4/29/25

To: pmicevych@mednet.ucla.edu >

Good morning, Paul,

I hope all is well on your end! I just want to get you up to speed with where I am in the lab currently.

Angela had forwarded the attached paper with a brief verbal rushed statement on the 23rd of April (Less than a minute long): That I establish my own protocols, that TC work will be two days a week (I don't know where the location is), and if I need to order anything I order it. That's about the full extent of the instruction(s) I have received—no additional context or communication outside the paper that was forwarded to me attached below plus the above.

I stopped by your office yesterday and again today to discuss this in person, but unfortunately missed you. Since I have had no engagement from or with Angela—not even a returned greeting of hello on numerous occasions—it's difficult to determine how best to proceed.

Could you please clarify:

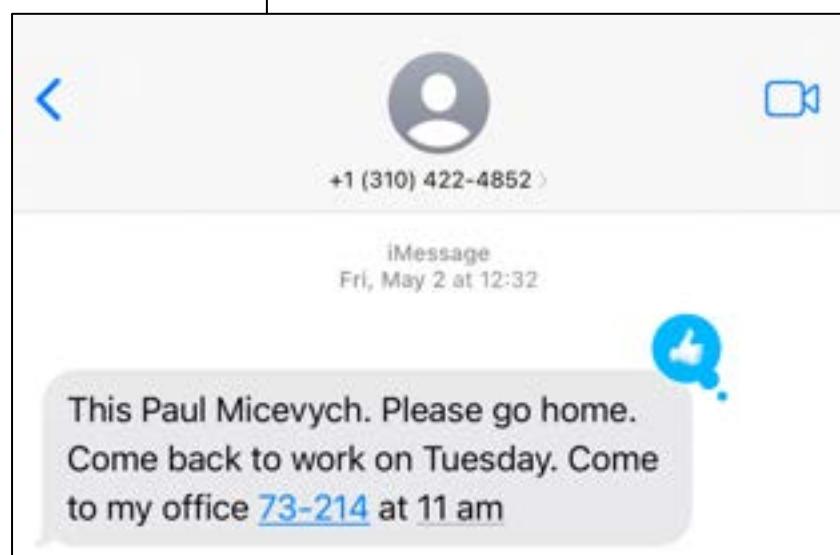
- What is the actual goal or intended outcome of this project?
- Is this work building on or replicating past experiments?
- Are there any specific expectations regarding methodology, output, or scope?

I'm committed to moving this forward productively, collaboratively, and/or independently as you prefer, but without direction or any communication, it's a challenge to ensure I'm aligned with any and all expectations of me.

Also, as a gentle reminder: I was underpaid in my last paycheck (64 hours), and I was locked out of the system for my current paycheck (80 hours). That brings the total to 144 hours not yet paid and/or processed from the past few weeks alone. I'd appreciate your help in getting these matter(s) resolved.

Thank you for your time, guidance, input, and assistance Paul; all are greatly appreciated!

Kind regards,



On Friday, May 2, 2025, Dr. Micevych contacted me and instructed me to go home early, under the false assumption that my conduct warranted such action. This decision was made due to Dr. Micevych being completely misled by individuals who had been tampering with my timesheets or providing false reports about my progress or behavior in the lab. As a result, I was sent home and told to return to work on Tuesday, May 6, 2025, despite having done nothing to merit such a response. To date I am not to report to lab until further notice.

 **Frohrip, Shelly** May 2, 2025 at 3:10 PM
RE: Ongoing issues

To: Harout Gulessarian

Hi Harout,

I received the following information about your pay:

From: Lucas, Mark MLucas@mednet.ucla.edu
Sent: Friday, May 2, 2025 3:03 PM
To: Samuels, Joshua jsamuels@mednet.ucla.edu; Frohrip, Shelly sfrohrip@irm.ucla.edu
Subject: RE: Harout Gulessarian "sent home" today

He will be paid in full for this time.

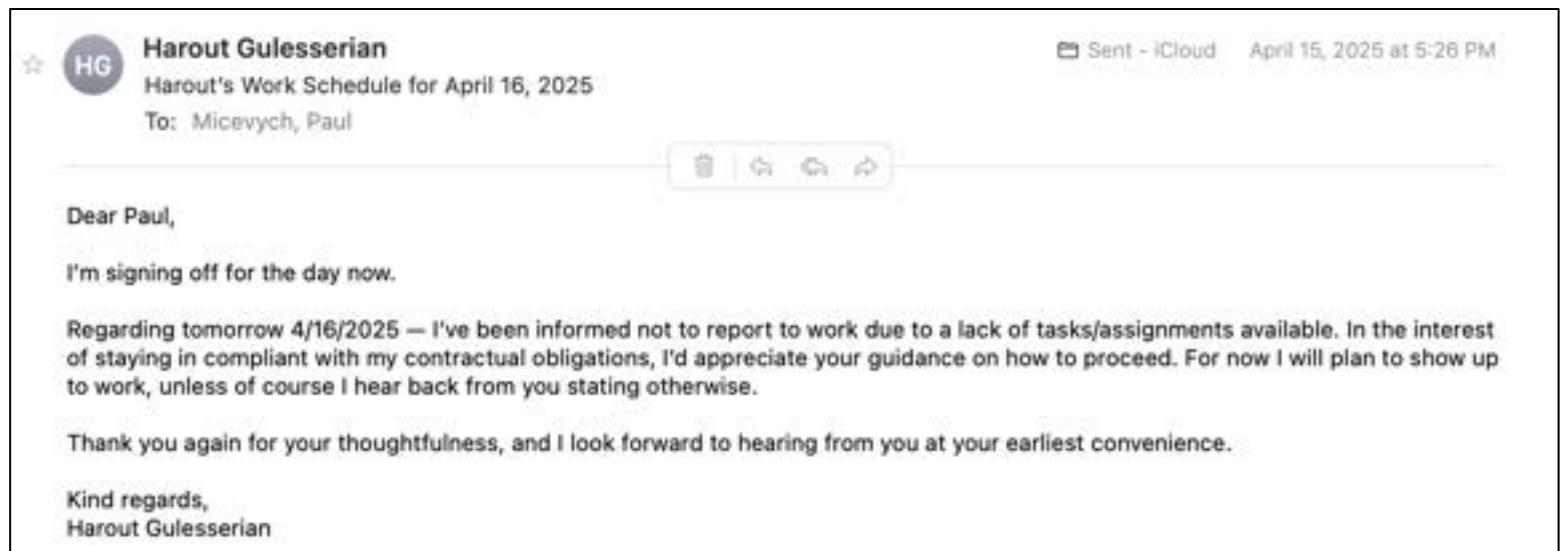
Shelly Frohrip
Employee Disability Management Services-Program Manager
Insurance and Risk Management
UCLA Office of the Vice Chancellor & Chief Financial Officer
(424) 259-5242

UCLA Office of the Vice Chancellor
& Chief Financial Officer

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Friday, May 2, 2025 2:23 PM
To: Frohrip, Shelly <sfrohrip@irm.ucla.edu>
Subject: Re: Ongoing issues

Hi Shelly,
Thank you for your time and for assisting me — I truly appreciate your help over the phone today during our conversation.
I wanted to share the screenshot of the message I received (attached below) indicating to go home, as I'm unclear about whether I'm expected to report to work before Tuesday or not as I am paid hourly. I would really appreciate some clarification on this as I'm sitting in front of the lab currently (attached below) and will do so until 5:00 PM.
Regarding the interview with Nico for the potential investigation, I want to ensure that I am provided with all relevant questions and given ample, unrestricted time to review and prepare my responses thoroughly.
Additionally, as mentioned to you, I request unlimited time to read any memorandums or documents first to Nico related to the investigation, so that I can respond accurately and completely with ample time given among other things. It's important to me that this process is handled fairly and transparently for processing questions and being able to have a meaningful opportunity to be heard.
I also want to express how frustrating and disheartening this entire situation has been. I feel that I have been mistreated throughout this entire process from the respondents, and have been completely isolated, especially regarding the way the Neurobiology department has handled this situation among others. I had hoped for a smoother and more respectful experience as all of the department seemed to have prior knowledge, motive, intent, and pattern of behavior towards me when I exercised my rights, and these individual's continue their bad faith acts towards me to this day which have and continue to have a material and negative impact on my employment terms at UCLA without limitations. Hopefully UCLA can resolve these issues accordingly and in a timely manner.

What was intended to be a transition from a hostile to a non-hostile work environment ultimately failed, due in large part to the undue influence exerted by Mark Lucas, who appeared to have significant control over decisions to act—or not act—on critical matters reported. Mark Lucas's involvement undermined the intended resolution, allowing the hostile dynamics to persist, despite administrative efforts from other departments to facilitate a healthier work setting.



Harout Gulessarian
Harout's Work Schedule for April 16, 2025
To: Micevych, Paul

Sent - iCloud April 15, 2025 at 5:26 PM

Dear Paul,

I'm signing off for the day now.

Regarding tomorrow 4/16/2025 — I've been informed not to report to work due to a lack of tasks/assignments available. In the interest of staying in compliant with my contractual obligations, I'd appreciate your guidance on how to proceed. For now I will plan to show up to work, unless of course I hear back from you stating otherwise.

Thank you again for your thoughtfulness, and I look forward to hearing from you at your earliest convenience.

Kind regards,
Harout Gulessarian

Evidence & Evidentiary Exhibit 27 – Confirmation of Discovery by Natella Balliaouri and Premature Disclosure

Natella Balliaouri, the individual who previously sent a Slack message with the intent to steal Gulessarian's discovery, later acknowledges Gulessarian's discovery and gives Gulessarian credit. Despite this, they continue to share the information with other labs prior to TDG protection. Dr. Novitch, fully aware of proper procedures, allowed this disclosure, forcing Gulessarian to bear the burden of ensuring compliance with UCLA Policy and UC reagents Policy 5105 and federal law without limitations.

NB NATELLA VAHKTANGOVNA BALIAOURI January 31, 2025 at 8:27 AM
Poster Authorship Details
To: Harout Gulessarian, Maria L Caballero, Cc: BENNETT NOVITCH

Hello Harout!

Maria and I are going to include you on the author list for our posters as we are using cell lines you helped generate (RTT fluorescent reporter) and changed our feeder free protocol to use the sb5 inhibitor. We want to let you know that you'll be credited for your work.

Please let me know if you have any questions or concerns.

All the best, and thank you,

Natella

Found in Sent - iCloud Mailbox

HG Harout Gulessarian February 2, 2025 at 7:05 PM
Re: Poster Authorship
To: NATELLA VAHKTANGOVNA BALIAOURI

Hello Natella,

Thank you for acknowledging my contributions; I really appreciate it! I am very grateful. I just have some questions regarding the authorship. Basically, given I am not aware that our lab had any viable feeder-free protocol which was in fact submitted, let alone accepted by TDG for patent purposes and/or commercial exploitation purposes, it is important that I know which of my manuscripts exactly is being credited so as to juxtapose my invention with any other prior pre-existing TDG submitted and accepted feeder free protocol, if any. Functionally this is important for TDG purposes, and without limitation UCLA Procedure 955.1 which I am actively pursuing and working on forwarding.

Once again thank you for acknowledging my contributions; as I said above, I am very grateful.

Kind regards,

Harout

[See More from NATELLA VAHKTANGOVNA BALIAOURI](#)

NB

NATELLA VAHKTANGOVNA BALIAOURI

Re: Poster Authorship

To: Harout Gulessarian, Cc: BENNETT NOVITCH

February 3, 2025 at 8:58 AM

Details



Hello Harout,

For poster authorship, it is a bit more informal than authorship for a paper. I am not describing the protocol, citing it, or in any way infringing on your intellectual property as there will be no actual information from your novel finding itself on the poster. I can send you a draft of my poster by the end of day tomorrow, but it is entirely focused on electrophysiological analysis of the Rett organoid model. However, given your assistance with tissue culture in the lab and the fact that some of the recorded organoids were generated using the protocol based on information within our lab, it is appropriate for us to credit you as an additional author.

Your hard work is always appreciated and I wanted to credit you as you have provided assistance to the Rett project multiple times and this poster would not be possible without your hard work. Again, nothing specific from your protocol is referenced, described, or cited. It's just putting your name on the poster as someone who contributed to the data that I will be presenting.

Does that make sense?

Thank you again,

Natella

[See More from Harout Gulessarian](#)

--
Natella Baliaouri
NSIDP Graduate Student
UCLA

HG

Harout Gulessarian

Re: Poster Authorship

To: NATELLA VAHKTANGOVNA BALIAOURI

February 7, 2025 at 6:58 AM



Hi Natella,

Thanks so so much for respecting my inventor Status and my IP interest under UCLA procedure 955.1. I am certain you understand how important this recognition is for my current and future academic career, for my advancement in my employment, and for commercial value purposes, just to name a few.

As the TDG process progresses, that's why I asked which of my manuscripts, if any was at issue, because I can't make any waivers, nor releases, and all my rights must be reserved in my novel IP until UCLA, TDG, myself, and others, can complete the 955.1 process and ultimately make all efforts to secure patent(s) underscoring commercial exploit, among other matters.

So, again thank you for the recognition of my novel IP, for the poster, and thanks for understanding the importance of trade secret status in conformity with UCLA Procedure 955.1, as I am actively furthering the commercial and academic matters with UCLA and relevant stakeholders.

Again, I am deeply deeply appreciative for the poster and the recognition of my work, as I eagerly await to see the poster and all positive aspects that come with it. I am very grateful.

Thank You!

Harout

**Evidence & Evidentiary Exhibit 28 – Misleading Guidance from “Dr. Micevych” (in quotes because someone else was answering as Dr. Micevych (verbally confirmed on May 6th 2025 by Dr. Micevych)
Following Wage and Hour Complaints made by Gulesserian.**



Micevych, Paul
To: Gulesserian, Harout K.
Wed 5/7/2025 6:05 AM

Dear Harout,
Thank you for meeting with me today. I appreciate you hearing the concerns related to your performance in my research lab. This afternoon you returned your lab key to me, but I want to re-iterate that you have not been dismissed or put on a leave, so you are expected to return to work today. Thanks.

Regards,
-Paul

Paul Micevych, PhD
Distinguished Research Professor & Chair
Edith Agnes Plumb Endowed Chair in Neurobiology
Dept of Neurobiology
David Geffen School of Medicine at UCLA

<https://micevych.neurobio.ucla.edu/>
Voice (Chair's Office): [310-825-2123](tel:310-825-2123)
Voice (Lab): [310-206-2162](tel:310-206-2162)
FAX: [310-825-2224](tel:310-825-2224)

L'Étoile du Nord



Micevych, Paul
To: Gulesserian, Harout K.
Wed 5/7/2025 5:43 PM

Got your text message.
I don't have the key anymore. Please pick it up on Monday from Mark. For the rest of the week please begin a lit-search on the role of the medial amygdala in prosocial behavior, especially steroid mediated behaviors (reproductive behaviors) in males and females – including humans.
Just to reiterate, you are still employed and will be paid.

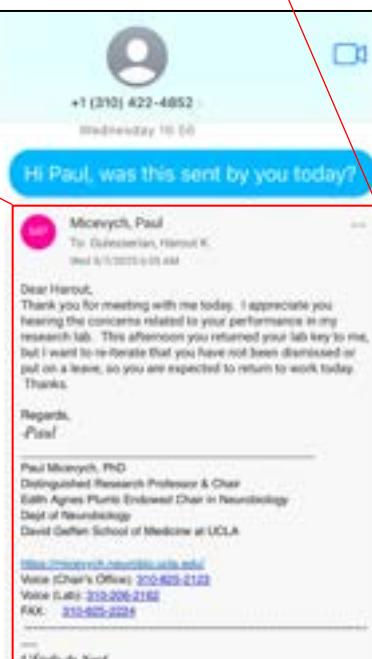
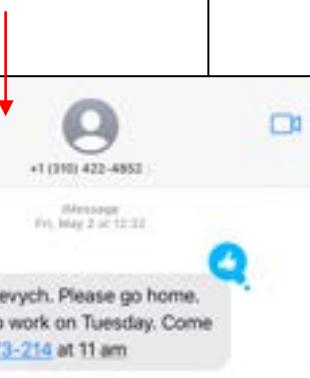
Regards,
-Paul

Paul Micevych, PhD
Distinguished Research Professor & Chair
Edith Agnes Plumb Endowed Chair in Neurobiology
Dept of Neurobiology
David Geffen School of Medicine at UCLA

<https://micevych.neurobio.ucla.edu/>
Voice (Chair's Office): [310-825-2123](tel:310-825-2123)
Voice (Lab): [310-206-2162](tel:310-206-2162)
FAX: [310-825-2224](tel:310-825-2224)

L'Étoile du Nord

Dr. Micevych and Gulesserian met on Tuesday, May 6, 2025.



Regards,
-Paul

Paul Micevych, PhD
Distinguished Research Professor & Chair
Edith Agnes Plumb Endowed Chair in Neurobiology
Dept of Neurobiology
David Geffen School of Medicine at UCLA

<https://micevych.neurobio.ucla.edu/>

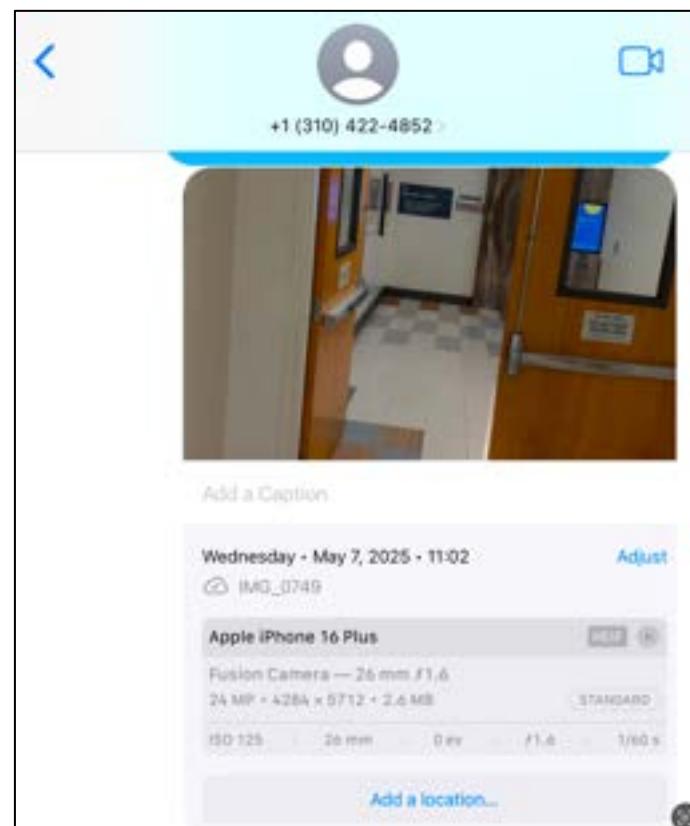
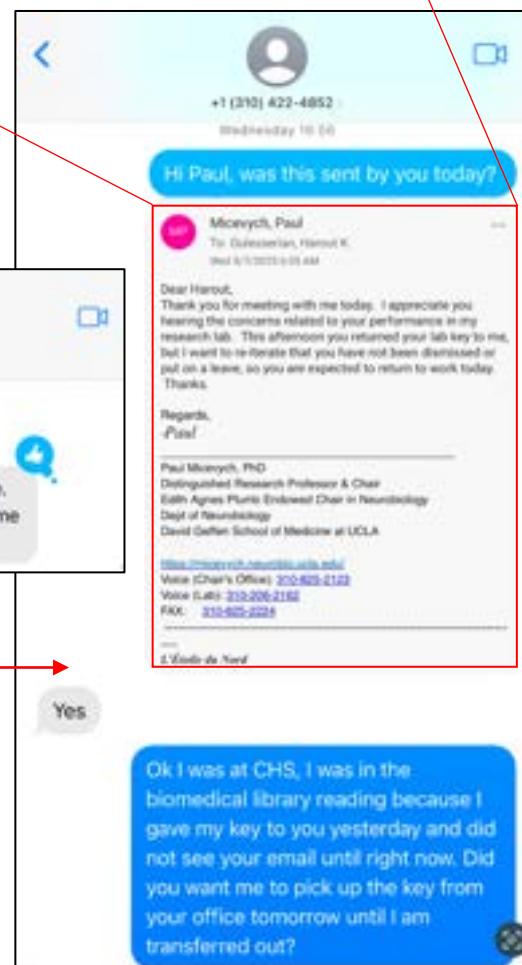
Voice (Chair's Office): [310-825-2123](tel:310-825-2123)

Voice (Lab): [310-206-2162](tel:310-206-2162)

FAX: [310-825-2224](tel:310-825-2224)

L'Étoile du Nord

The next day, Gulesserian receives this message



MP

Micevych, Paul

To: Gulesserian, Harout K.
Fri 5/9/2025 4:37 PM

...

Harout -

You need to complete the following trainings:

- Safe Use of Biosafety Cabinets
- Chemical Hygiene Plan
- Bloodborne Pathogens Refresher

Please do these at home or in the library

Regards,

-Paul

Paul Micevych, PhD

Distinguished Research Professor & Chair
Edith Agnes Plumb Endowed Chair in Neurobiology
Dept of Neurobiology
David Geffen School of Medicine at UCLA

<https://micevych.neurobio.ucla.edu/>

Voice (Chair's Office): [310-825-2123](tel:310-825-2123)

Voice (Lab): [310-206-2162](tel:310-206-2162)

FAX: [310-825-2224](tel:310-825-2224)

Shipping address:

Dr. Paul Micevych
Dept of Neurobiology
10833 LeConte Ave.
David Geffen School of Medicine at UCLA

MP

Micevych, Paul

To: Gulesserian, Harout K.
Fri 5/9/2025 1:49 PM

...

Harout -

You need to follow directions. I asked you to pick up your key on Monday (5/12) from Mark. You ignored my directions and went to Mark's office this week.

I also asked you not to go to the lab this week. You ignored me both yesterday and again today.
If you can't follow simple instructions, how am I to trust you with experiments.

At this point you are not to come into the lab until further notice. You have instructions to work in the library or at home.

Please acknowledge that you received this message and that you understand it.

Regards,

-Paul

Paul Micevych, PhD

Distinguished Research Professor & Chair
Edith Agnes Plumb Endowed Chair in Neurobiology
Dept of Neurobiology
David Geffen School of Medicine at UCLA

<https://micevych.neurobio.ucla.edu/>

Voice (Chair's Office): [310-825-2123](tel:310-825-2123)

Voice (Lab): [310-206-2162](tel:310-206-2162)



MP

Micevych, Paul

To: Gulesserian, Harout K.
Wed 5/7/2025 6:05 AM

...

Dear Harout,

Thank you for meeting with me today. I appreciate you hearing the concerns related to your performance in my research lab. This afternoon you returned your lab key to me, but I want to re-iterate that you have not been dismissed or put on a leave; so you are expected to return to work today.
Thanks.

Regards,

-Paul

Paul Micevych, PhD

Distinguished Research Professor & Chair
Edith Agnes Plumb Endowed Chair in Neurobiology
Dept of Neurobiology
David Geffen School of Medicine at UCLA

<https://micevych.neurobio.ucla.edu/>

Voice (Chair's Office): [310-825-2123](tel:310-825-2123)

Voice (Lab): [310-206-2162](tel:310-206-2162)

FAX: [310-825-2224](tel:310-825-2224)

L'Étoile du Nord

Evidence & Evidentiary Exhibit 29 – Mark Lucas Identifies lead Investigator Catherine Kramer and Demonstrates Bias that was originally reported by Gulessarian.

This exhibit shows that Mark Lucas identified the investigator assigned to the case, despite his own direct involvement in the matter. Lucas is not a neutral party, as demonstrated by documented evidence of his conduct toward Gulessarian, including attempts to belittle Gulessarian's discovery. His actions raise serious concerns about conflict of interest, lack of impartiality, and accountability.

ML **Lucas, Mark**
Follow up
To: Gulessarian, Harout K., Harout Gulessarian

✉️ 🗑️ 🗒️ 🗓️ 🗣️

Hi, Harout. I'm following up to our conversation the week before last. We spoke with the investigator who said she has no objection to you returning all of the below items to Novitch's lab. If you reach out to **Cathy Kramer, the investigator for your complaint**, she will be pleased to discuss. Her e-mail is: ckramer@compliance.ucla.edu. Could you please return all the materials below per our discussion? We do understand that items related to your **'discovery'** may be reviewed separately. Thanks for your help.

Items to be Returned to Lab

1. Lab Notebooks- paper and all electronic records. Include protocols and any other supporting information.
2. All data from experiments- raw and processed image files Zeiss format, TIFF, JPG, fastq and other sequence files, image composite files, powerpoint presentations, etc.
3. Portable hard drives obtained from the lab. If lab files are stored on personal hard drives, these files must be transferred and archived onto a data server and then erased from personal devices.

Evidence & Evidentiary Exhibit 30 – Withheld or Tampered Paychecks Since February 2025

As of February 2025, multiple paychecks have been either withheld or tampered with, resulting in approximately \$2,700 in missing wages corresponding to 144 unpaid hours. These discrepancies are reflected in Gulessarian's bank records and remain unresolved.

HG Harout Gulessarian
Harout Gulessarian (Paycheck issues)
To: Helen A. Nguyen

February 26, 2025 at 10:37 AM

Dear Helen,

I hope you are well. I wanted to bring to your attention that I have not received payment for the two days of paid time off that I was promised from the previous paycheck. Could you please look into this and let me know when I can expect to receive payment for these two days? (Please see the screenshots provided below with Mark Lewis regarding the days in question from the previous paycheck).

2/2/2025 8 hours missing (Paid time off) (Previous paycheck)

2/3/2025 8 hours missing (Paid time off) (Previous paycheck)

Additionally, I am unable to add my hours for the last two weeks worked in Dr. Paul Micevych's lab since my lateral transfer, the current payroll has been locked. I have included my schedule and attendance below, with a total of 76 hours worked for the mentioned weeks (the current paycheck).

8:00 AM - 4:00 PM 2/7/2025 = 8 hours holiday pay

10:10 AM - 4:00PM 10 min lunch 2/8/2025 = 5.5 hours

8:00 AM - 3:30 PM 30 min lunch 2/9/2025 = 7 hours

8:00 AM - 4:00 PM 30 min lunch 2/10/2025 = 8 hours

8:00 AM - 5:00 PM 1 hour lunch 2/11/2025 = 8 hours

9:15AM - 4:00 PM 1 Hour Lunch 2/12/2025 = 8 hours

7:30 AM - 5:30pm (Normal Hours) 2/13/2025 = 8 hours normal 2 hours doctors (18-12)

7:30AM-8:00PM 1 hour lunch 2/14 = 7.5 hours worked

7:00AM - 4:00 PM 1 hour lunch 2/17 = 8 hours worked

7:00 AM - 4:00PM 1 hour lunch 2/18/2025 = 8 hours worked

Total hours for 2/6- 2/18 = 76 Hours

Thank you for your assistance, and I look forward to your prompt response.

Best regards,
Harout Gulessarian

HG Harout Gulessarian
Harout Gulessarian Paycheck Discrepancies
To: Helen A. Nguyen, Cc: Shelly Frohrip

March 18, 2025 at 8:48 AM

Details

Hi Helen,

I hope you're doing well. I wanted to bring a couple of issues to your attention regarding my recent timesheets and paychecks.

1. In my last paid out paycheck, I noticed that I was overpaid. I worked 75.25 hours (See original email I had sent to you), but the total was altered to ~79 hours without me making any changes from my end.
2. For the current timesheet that was submitted, it shows regular hours for the 11th of March, but I was actually sick that day and used my sick hours (See image below).

Could you please help in resolving these discrepancies if possible? Thank you for your time and assistance; they are appreciated.

Kind regards,

Harout Gulessarian

07:59 100% LTE

Harout out due to illness

Gulessarian, Harout K.
To: Wong, Angela
Tue 3/12/2025 8:35 AM

Good morning Angela,

Just wanted to let you know that I will not be in today due to illness.

Kind regards,
Harout Gulessarian



Harout Gulessarian

To: pmicevych@mednet.ucla.edu >

4/29/25

Harout Gulessarian : Fwd: Any tasks for the day?

Good morning, Paul,

I hope all is well on your end! I just want to get you up to speed with where I am in the lab currently.

Angela had forwarded the attached paper with a brief verbal rushed statement on the 23rd of April (Less than a minute long): That I establish my own protocols, that TC work will be two days a week (I don't know where the location is), and if I need to order anything I order it. That's about the full extent of the instruction(s) I have received—no additional context or communication outside the paper that was forwarded to me attached below plus the above.

I stopped by your office yesterday and again today to discuss this in person, but unfortunately missed you. Since I have had no engagement from or with Angela—not even a returned greeting of hello on numerous occasions—it's difficult to determine how best to proceed.

Could you please clarify:

- What is the actual goal or intended outcome of this project?
- Is this work building on or replicating past experiments?
- Are there any specific expectations regarding methodology, output, or scope?

I'm committed to moving this forward productively, collaboratively, and/or independently as you prefer, but without direction or any communication, it's a challenge to ensure I'm aligned with any and all expectations of me.

Also, as a gentle reminder: I was underpaid in my last paycheck (64 hours), and I was locked out of the system for my current paycheck (80 hours). That brings the total to 144 hours not yet paid and/or processed from the past few weeks alone.



Evidence & Evidentiary Exhibit 31 – original report to Mark Lucas April 2024 where Lucas became a party because Lucas decided to not hold accountable the conduct or misconduct of Bennett Novitch and Samantha Butler (See PDEH FMLA portion for retaliation for Gulesserian whistleblowing as well).

BN BENNETT NOVITCH ① To: Harout Cc: Mark >

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

4/15/24

Harout Gulesserian
Re: Chat?
To: Lucas, Mark

April 25, 2024 at 12:48 AM

Good day, Mark.

After discussing time off for healthcare matters(among other things), and reaching an understanding with the UCLA Office of Ombuds 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/insidious 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/insidious 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

Evidence & Evidentiary Exhibit 32 – University of California Policies, California State Law, and Federal Law without limitations

See NIH rules for reporting

University of California – IP Policy

Policy on Inventions, Patents, and Innovation Transfer



Responsible Officer:	VP - Research and Innovation
Responsible Office:	RI - Research and Innovation
Issuance Date:	02/02/2024
Effective Date:	07/01/2024
Scope:	All University employees, non-employees using University Research Facilities, and non-employees using gifts, grants, or contracts received by or through the University.
Contact:	Deborah Motton
Title:	Executive Director, Research Policy Analysis and Coordination
Email:	Deborah.Motton@ucop.edu
Phone:	(510) 587-6053

TABLE OF CONTENTS

I. POLICY SUMMARY.....	1
II. DEFINITIONS.....	2
III. POLICY TEXT	3
IV. COMPLIANCE / RESPONSIBILITIES	3
V. PROCEDURES	3
VI. RELATED INFORMATION	4
VII. FREQUENTLY ASKED QUESTIONS.....	4
VIII. REVISION HISTORY	4

I. POLICY SUMMARY

The University of California ("University") is a major driver of economic and social prosperity in the State of California. This impact is primarily accomplished through the education of a highly trained workforce, the publication of research results, and the development of societal solutions through research and service initiatives. The University strives to manage [intellectual property assets](#) for the long-term benefit of both the University and the people of the State of California.

This policy supports the practical application of University research and the [Regents Policy on Innovation Transfer & Entrepreneurship](#) by establishing the University's

	UNIVERSITY OF CALIFORNIA STATE OATH OF ALLEGIANCE, PATENT POLICY, AND PATENT ACKNOWLEDGMENT	EMPLOYEE'S NAME (Last, First, Middle Initial)	DATE PREPARED Mo/Dy/Yr
	UPAY585 (R 11/2011) E0420 71443-180	EMPLOYEE ID	DEPARTMENT
<p>STATE OATH OF ALLEGIANCE: I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States and the Constitution of the State of California against all enemies, foreign and domestic; that I will bear true faith and allegiance to the Constitution of the United States and the Constitution of the State of California; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties upon which I am about to enter.</p>			
Taken and subscribed before me on: _____ Signature of Authorized Official: _____ Title: _____ County: _____ State: _____		Signature of Officer or Employee: _____ (Do not sign until in the presence of proper witness.) NOTE: No fee may be charged for administering this oath.	
<p>The oath must be administered by either (1) a person having general authority by law to administer oaths—for example, Notaries Public, Civil Executive Officers (Gov. Code Sec. 1001), Judicial Officers, Justices of the Peace, and county officials named in Gov. Code Sections 24000, 24057, such as, district attorneys, sheriffs, county clerks, members of boards of supervisors, etc., or (2) by any University Officer or employee who has been authorized in writing by The Regents to administer such oaths.</p>			
<p>WHO MUST SIGN THE OATH: All persons (other than aliens) employed by the University, in common with all other California public employees, whether with or without compensation, must sign the oath. (Calif. Constitution, Article XX, Section 2, Calif. Gov. Code Sections 3100-3102.)</p> <p>All persons re-employed by the University after a termination of service must sign a new Oath if the date of re-employment is more than one year after the date on which the previous Oath was signed (Calif. Gov. Code Sec. 3102.)</p> <p>WHEN OATH MUST BE SIGNED: The Oath must be signed BEFORE the individual enters upon the duties of employment (Calif. Constitution, Article XX, Section 3; Calif. Gov. Code Sec. 3102.)</p>		<p>WHERE OATHS ARE FILED: The Oaths of all employees of the University shall be filed with the Campus Accounting Office.</p> <p>FAILURE TO SIGN OATH: No compensation for service performed prior to his subscribing to the Oath or affirmation may be paid to a University employee. And no reimbursement for expenses incurred may be paid prior to his subscribing to the Oath or affirmation. (Calif. Gov. Code Sec. 3107.)</p> <p>PENALTIES: "Every person who, while taking and subscribing to the Oath or affirmation required by this chapter, states as true any material which he knows to be false, is guilty of perjury, and is punishable by imprisonment in the state prison not less than one or more than 14 years." (Calif. Gov. Code Sec. 3108.)</p>	
<p>PATENT ACKNOWLEDGMENT</p> <p>This acknowledgment is made by me to The Regents of the University of California, a corporation, hereinafter called "University," in part consideration of my employment, and of wages and/or salary to be paid to me during any period of my employment, by University, and/or my utilization of University research facilities and/or my receipt of gift, grant, or contract research funds through the University.</p> <p>By execution of this acknowledgment, I understand that I am not waiving any rights to a percentage of royalty payments received by University, as set forth in the University of California Patent Policy, hereinafter called "Policy."</p> <p>I also understand and acknowledge that the University has the right to change the Policy from time to time, including the percentage of net royalties paid to inventors, and that the policy in effect at the time an invention is disclosed shall govern the University's disposition of royalties, if any, from that invention.</p> <p>Further, I acknowledge that the percentage of net royalties paid to inventors is derived only from consideration in the form of money or equity received under: 1) a license or bailment agreement for licensed rights, or 2) an option or letter agreement leading to a license or bailment agreement. I also acknowledge that the percentage of net royalties paid to inventors is not derived from research funds or from any other consideration of any kind received by the University.</p> <p>The Policy on Accepting Equity When Licensing University Technology governs the treatment of equity received in consideration for a license.</p> <p>I acknowledge my obligation to assign, and do hereby assign, inventions and patents that I conceive or develop 1) within the course and scope of my University employment while employed by University, 2) during the course of my utilization of any University research facilities, or 3) through any connection with my use of gift, grant, or contract research funds received through the University. I further acknowledge my obligation to promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the University authorized licensing office. Such inventions shall be examined by the University to determine rights and equities therein in accordance with the Policy. I shall promptly furnish University with complete information with respect to each.</p> <p>In the event any such invention shall be deemed by University to be patentable or protectable by an analogous property right, and University desires, pursuant to determination by University as to its rights and equities therein, to seek patent or analogous protection thereon, I shall execute any documents and do all things necessary, at University's expense, to assign to University all rights, title, and interest therein and to assist University in securing patent or analogous protection thereon. The scope of this provision is limited by Calif. Labor Code Sec. 2870, to which notice is given below. In the event I protest the University's determination regarding any rights or interest in an invention, I acknowledge my obligation: (a) to proceed with any University requested assignment or assistance; (b) to give University notice of that protest no later than the execution date of any of the above-described documents or assignment; and (c) to reimburse University for all expenses and costs it encounters in its patent application attempts, if any such protest is subsequently sustained or agreed to.</p> <p>I acknowledge that I am bound to do all things necessary to enable University to perform its obligations to grantors of funds for research or contracting agencies as said obligations have been undertaken by University.</p> <p>University may relinquish to me all or a part of its right to any such invention, if, in its judgment, the criteria set forth in the Policy have been met.</p> <p>I acknowledge that I am bound during any periods of employment by University or for any period during which I conceive or develop any invention during the course of my utilization of any University research facilities, or any gift, grant, or contract research funds received through the University.</p> <p>In signing this acknowledgment, I understand that the law, of which notification is given below, applies to me, and that I am still required to disclose all my inventions to the University.</p>		<p>NOTICE: This acknowledgment does not apply to an invention which qualifies under the provision of Calif. Labor Code Sec. 2870 which provides that (a) Any provision in an employment agreement which provides that an employee shall assign, or offer to assign, any of his or her rights in an invention to his or her employer shall not apply to an invention that the employee developed entirely on his or her own time without using the employer's equipment, supplies, facilities, or trade secret information except for those inventions that either: (1) Relate at the time of conception or reduction to practice of the invention to the employer's business, or actual or demonstrably anticipated research or development of the employer; or (2) Result from any work performed by the employee for the employer. (b) To the extent a provision in an employment agreement purports to require an employee to assign an invention otherwise excluded from being required to be assigned under subdivision (a), the provision is against the public policy of this state and is unenforceable. In any suit or action arising under this law, the burden of proof shall be on the individual claiming the benefits of its provisions.</p>	
<p>RETENTION: Accounting: 5 years after separation, except in cases of disability, retirement or disciplinary action, in which case retain until age 70.</p> <p>Other Copies: 5 years after separation</p>		<p>Employee/Guest Name (Please print): _____</p> <p>Employee/Guest Signature: _____ Date: _____</p> <p>Witness Signature & University Acceptance: _____ Date: _____</p>	

PLEASE SIGN STATE OATH AND PATENT ACKNOWLEDGMENT

UNIVERSITY OF CALIFORNIA PATENT POLICY—October 1, 1997

I. PREAMBLE

It is the intent of the President of the University of California, in administering intellectual property rights for the public benefit, to encourage and assist members of the faculty, staff, and others associated with the University in the use of the patent system with respect to their discoveries and inventions in a manner that is equitable to all parties involved.

The University recognizes the need for and desirability of encouraging the broad utilization of the results of University research, not only by scholars but also in practical application for the general public benefit, and acknowledges the importance of the patent system in bringing innovative research findings to practical application.

Within the University, innovative research findings often give rise to patentable inventions as fortuitous by-products, even though the research was conducted for the primary purpose of gaining new knowledge. The following University of California Patent Policy is adopted to encourage the practical application of University research for the broad public benefit; to appraise and determine relative rights and equities of all parties concerned; to facilitate patent applications, licensing, and the equitable distribution of royalties, if any; to assist in obtaining funds for research; to provide for the use of invention-related income for the further support of research and education; and to provide a uniform procedure in patent matters when the University has a right or equity.

II. STATEMENT OF POLICY

A. An agreement to assign inventions and patents to the University, except those resulting from permissible consulting activities without use of University facilities, shall be mandatory for all employees, for persons not employed by the University but who use University research facilities, and for those who receive gift, grant, or contract funds through the University. Such an agreement may be in the form of an acknowledgment of obligation to assign. Exemptions from such agreements to assign may be authorized in those circumstances when the mission of the University is better served by such action, provided that overriding obligations to other parties are met and such exemptions are not inconsistent with other University policies.

B. Those individuals who have so agreed to assign inventions and patents shall promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions to the Office of Technology Transfer or authorized licensing office. They shall execute such declarations, assignments, or other documents as may be necessary in the course of invention evaluation, patent prosecution, or protection of patent or analogous property rights, to assure that title in such inventions shall be held by the University or by such other parties designated by the University as may be appropriate under the circumstances. Such circumstances would include, but not be limited to, those situations when there are overriding patent obligations of the University arising from gifts, grants, contracts, or other agreements with outside organizations.

In the absence of overriding obligations to outside sponsors of research, the University may release patent rights to the inventor in those circumstances when:

1. The University elects not to file a patent application and the inventor is prepared to do so, or
2. the equity of the situation clearly indicates such release should be given, provided in either case that no further research or development to develop that invention will be conducted involving University support or facilities, and provided further that a shop right is granted to the University.

C. Subject to restrictions arising from overriding obligations of the University pursuant to gifts, grants, contracts, or other agreements with outside organizations, the University agrees, following said assignment of inventions and patent rights, to pay annually to the named inventor(s), or to the inventor(s)' heirs, successors, or assigns, 35% of the net royalties and fees per invention received by the University. An additional 15% of net royalties and fees per invention shall be allocated for research-related purposes on the inventor's campus or Laboratory. Net royalties are defined as gross royalties and fees, less the costs of patenting, protecting, and preserving patent and related property rights, maintaining patents, the licensing of patent and related property rights, and such other costs, taxes, or reimbursements as may be necessary or required by law.

Inventor shares paid to University employees pursuant to this paragraph

represent an employee benefit. When there are two or more inventors, each inventor shall share equally in the inventor's share of royalties, unless all inventors previously have agreed in writing to a different distribution of such share.

Distribution of the inventor's share of royalties shall be made annually in November from the amount received during the previous fiscal year ending June 30th, except as provided for in Section II.D. below. In the event of any litigation, actual or imminent, or any other action to protect patent rights, the University may withhold distribution and impound royalties until resolution of the matter.

D. The DOE Laboratories may establish separate royalty distribution formulas, subject to approval by the President. Distribution of the inventor's share of DOE Laboratory royalties shall be made annually in February from the amount received during the previous fiscal year ending September 30th. All other elements of this policy shall continue to apply.

E. Equity received by the University in licensing transactions, whether in the form of stock or any other instrument conveying ownership interest in a corporation, shall be distributed in accordance with the Policy on Accepting Equity When Licensing University Technology.

F. In the disposition of any net income accruing to the University from patents, first consideration shall be given to the support of research.

III. PATENT RESPONSIBILITIES AND ADMINISTRATION

A. Pursuant to Regents' Standing Order 100.4/mm), the President has responsibility for all matters relating to patents in which the University of California is in any way concerned. This policy is an exercise of that responsibility, and the President may make changes to any part of this policy from time to time, including the percentage of net royalties paid to inventors.

B. The President is advised on such matters by the Technology Transfer Advisory Committee (TTAC), which is chaired by the Senior Vice President—Business and Finance. The membership of TTAC includes the Provost and Senior Vice President—Academic Affairs, the Director of the Office of Technology Transfer, and representatives from the campuses, DOE Laboratories, Academic Senate, the Division of Agriculture and Natural Resources and the Office of the General Counsel. TTAC is responsible for:

1. Reviewing and proposing University policy on intellectual property matters including patents, copyrights, trademarks, and tangible research products;
 2. Reviewing the administration of intellectual property operations to ensure consistent application of policy and effective progress toward program objectives; and
 3. Advising the President on related matters as requested.
- C. The Senior Vice President—Business and Finance is responsible for implementation of this Policy, including the following:
1. Evaluating inventions and discoveries for patentability, as well as scientific merit and practical application, and requesting the filing and prosecution of patent applications.
 2. Evaluating the patent or analogous property rights or equities held by the University in an invention, and negotiating agreements with cooperating organizations, if any, with respect to such rights or equities.
 3. Negotiating licenses and license option agreements with other parties concerning patent and/or analogous property rights held by the University.
 4. Directing and arranging for the collection and appropriate distribution of royalties and fees.
 5. Assisting University officers in negotiating agreements with cooperating organizations concerning prospective rights to patentable inventions or discoveries made as a result of research carried out under gifts, grants, contracts, or other agreements to be funded in whole or in part by such cooperating organizations, and negotiating with Federal agencies regarding the disposition of patent rights.
 6. Approving exceptions from the agreement to assign inventions and patents to the University as required by Section II.A. above.
 7. Approving exemptions to University policy on intellectual property matters including patents, copyrights, trademarks, and tangible research products.

PLEASE SIGN THE STATE OATH and PATENT ACKNOWLEDGEMENT on page 1

CHAPTER 18—PATENT RIGHTS IN INVENTIONS MADE WITH FEDERAL ASSISTANCE

Sec.	
200.	Policy and objective.
201.	Definitions.
202.	Disposition of rights.
203.	March-in rights.
204.	Preference for United States industry.
205.	Confidentiality.
206.	Uniform clauses and regulations.
207.	Domestic and foreign protection of federally owned inventions.
208.	Regulations governing Federal licensing.
209.	Licensing federally owned inventions.
210.	Precedence of chapter.
211.	Relationship to antitrust laws.
212.	Disposition of rights in educational awards.

AMENDMENTS

2000—Pub. L. 106–404, §4(b), Nov. 1, 2000, 114 Stat. 1744, substituted “Licensing federally owned inventions” for “Restrictions on licensing of federally owned inventions” in item 209.

1984—Pub. L. 98–620, title V, §501(15), Nov. 8, 1984, 98 Stat. 3368, added item 212.

1982—Pub. L. 97–256, title I, §101(5), Sept. 8, 1982, 96 Stat. 816, redesignated chapter 38, as added by Pub. L. 96–517, §6(a), Dec. 12, 1980, 94 Stat. 3018, comprising sections 200 to 211, as chapter 18, and transferred chapter 18, as so redesignated, to end of this part from end of part IV.

§200. Policy and objective

It is the policy and objective of the Congress to use the patent system to promote the utilization of inventions arising from federally supported research or development; to encourage maximum participation of small business firms in federally supported research and development efforts; to promote collaboration between commercial concerns and nonprofit organizations, including universities; to ensure that inventions made by nonprofit organizations and small business firms are used in a manner to promote free competition and enterprise without unduly encumbering future research and discovery; to promote the commercialization and public availability of inventions made in the United States by United States industry and labor; to ensure that the Government obtains sufficient rights in federally supported inventions to meet the needs of the Government and protect the public against misuse or unreasonable use of inventions; and to minimize the costs of administering policies in this area.

(Added Pub. L. 96–517, §6(a), Dec. 12, 1980, 94 Stat. 3018; amended Pub. L. 106–404, §5, Nov. 1, 2000, 114 Stat. 1745.)

AMENDMENTS

2000—Pub. L. 106–404 substituted “enterprise without unduly encumbering future research and discovery;” for “enterprise;”.

Evidence & Evidentiary Exhibit 33 – UCLA Procedure 955.1: Release of Patent Rights to Inventors

UCLA Procedure 955.1: Release of Patent Rights to Inventors

Issuing Officer: Vice Chancellor - Research

Responsible Office: Technology Development Group - [Look Up Contact Person](#)

Effective Date: July 10, 2018

Revision History: [APP History](#)



I. PURPOSE & SCOPE

The purpose of this Procedure is to articulate the conditions in which the University of California ("University") will release patent rights to their Inventors. This Policy applies to all employees and others as specified in the [University of California Patent Policy](#) (the "Patent Policy").

II. DEFINITIONS

For the purposes of this Procedure:

Inventor(s) refers to individuals who are identified as Inventors on the patent rights pursued on the invention and assigned their rights to the Regents or whose interests are owned by the Regents as a matter of policy, law, or contract.

Net Income means any and all consideration, including equity received by the Inventors from the commercialization of a Released Patent (as defined below), less the Inventor's documented unreimbursed out-of-pocket expenses in the prosecution of the Released Patent and its commercialization.

III. STATEMENT

When the University elects not to file a patent application or to commercialize a patent, it may elect, at its absolute discretion, to release such patent rights to the Inventor(s) (the "Released Patent"). Such release will be made subject to the following conditions:

1. The Released Patent shall be subject to any rights that the sponsors of the research (that led to the invention relating to the Released Patent) may have. Patent rights related to an invention supported by a federal funding agency may not be released by the University directly to the Inventors and, as such, this Procedure will apply subject to the federal funding agency's release of such Released Patent.
2. The Inventor(s) must have disclosed to the University all material facts pertaining to the Released Patent and its commercial potential.
3. Each of the Inventors shall agree, in writing, to assignment of title in the Released Patent to her/his co-inventors and relinquish any rights they may have to income received by the University pursuant to Paragraph 6(b) below.
4. The Inventor(s) shall agree, in writing, that no further research or development of the invention related to the Released Patent may be conducted using any support, services, or facilities of the University.
5. The Regents expressly reserves the right to: (a) use the Released Patent and associated technology for educational and research purposes, to perform research sponsored by commercial entities, and to perform clinical research and diagnostic and prognostic services; (b) publicly disclose research results; and (c) allow other non-profit and academic institutions to use the Released Patent and associated technology for the same purposes as all of the foregoing.
6. If the Released Patent is commercialized by the Inventor(s), the relevant Inventor(s) shall:
 - a. Reimburse the University for its out-of-pocket expenses relating to the Released Patent on a pro rata basis in view of the amount the Inventor(s) spent in pursuing patenting the Released Patent; and
 - b. Pay to the University twenty percent (20%) of all Net Income received by the Inventor(s) from such commercialization, which the campus will redistribute per UCLA Procedure 955-2; provided however, in cases of equity UCLA shall not be entitled to receive more than five percent (5%) of the issued shared capital of the licensee.

Evidence & Evidentiary Exhibit 34 – Ongoing Delay and Failure by Dr. Bennett Novitch to Disclose University Property

This exhibit documents Dr. Bennett Novitch's continued failure to comply with legal and institutional obligations by withholding disclosure of potentially patentable intellectual property, which is the rightful property of the University under applicable policies and law.

Included is a video from 2022, in which Dr. Novitch refers to the brain organoid industry as the “wild wild west,” suggesting underlying financial motives and a disregard for proper IP disclosure procedures by Novitch and his collaborators.

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

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

Kind regards,
Harout

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

April 12, 2024 at 7:09 PM

Details

Hello Harout,

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

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



BENNETT NOVITCH

Re: Delays

To: Natella Ballaouri, Cc: Harout Gulessarian

April 13, 2024 at 12:56 AM

[Details](#)

I need to clear the air here, as I seem to be the initiator of this request from a conversation that I had with Ivan earlier today. He mentioned that he was unable to do many hippocampus recordings before he graduates since there have been problems with organoid formation broadly in the lab, likely related to the MEF issues. I commented to him that perhaps he could talk to Harout to see if some of the many organoids that he and Erick have been generated from the KOLF2.2J cell line could be spared and tested to see if they could be turned into hippocampus and GE, which to my knowledge still has not been formally tested. I was thinking of this as a potential win-win and perhaps give us a chance to start thinking about conducting some electrophysiological recordings which could be great for both validating the FF organoid protocol and advancing the goals of our SSIpayGene 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 patient" is driving me nuts. A lot of work and contributions from people in the lab before you have gone into these methods, and I thus view our methods as the collective wisdom and property of the lab. Anyone working in our group should have access to that knowledge and the reagents needed. Please give the information that Natella, Cendi, and anyone else who is struggling with their organoid experiments need to see if what you've found works for you also works for them and their cells. It is imperative that we keep all of our projects moving forward as we have an obligation to our funding agencies to do the experiments that we said that we were going to do. By withholding information or providing it piecemeal, it is impeding other's progress and thus harms everyone. Funding for our Rett syndrome project has been fueling a lot of our research expenses and going towards people's salaries. If we do not fulfill our obligations and make steady progress, it puts everything at risk.

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

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

Ben

From: Harout Gulesserian HKG90@icloud.com
Subject: Re: Delays
Date: April 15, 2024 at 2:25 AM
To: BENNETT NOVITCH bnovitch@g.ucla.edu

HG

Hi Ben,

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

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

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

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



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

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

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

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

- 1) Why are you not providing the information that you are supposed to provide as per UCLA policy to protect the intellectual property rights?

UCLA Policy 993: Responding to Allegations of Research Misconduct

Issuing Officer: Executive Vice Chancellor & Provost

Responsible Dept: Office of the Vice Chancellor for Research and Creative Activities

Effective Date: June 17, 2022

Supersedes: UCLA Policy 993, dated 10/27/2010

I. PURPOSE & SCOPE

II. DEFINITIONS

III. POLICY STATEMENT

IV. PROCEDURES

V. REFERENCES

VI. ATTACHMENTS

I. PURPOSE & SCOPE

UCLA is committed to maintaining the integrity of scholarship and Research, and to fostering a climate conducive to Research integrity in accordance with the University's Policy on Integrity in Research. Such integrity includes not only the avoidance of wrong doing but also the rigor, carefulness, and accountability that are hallmarks of good scholarship.

This Policy implements this commitment and outlines the procedures for reporting and responding to Allegations of Research Misconduct, and is also intended to satisfy the requirements of the U.S. Department of Health and Human Services (DHHS), the National Science Foundation, and other federal agencies.

This Policy applies to:

1. All academic appointees, postdoctoral scholars, and staff, who held appointments at UCLA at the time of the alleged Research Misconduct; and
2. Others at UCLA (including paid and unpaid students) working on externally (including federally) sponsored Research projects or being supported by externally (including federally) funded Research training grants when Research Misconduct involving their supported work was alleged to have occurred, if the external sponsor requires a process for responding to Allegations of Research Misconduct that is similar to, or based on the federal Research Misconduct regulations.

This policy does *not* apply to:

3. Students (including those preparing Master's or Ph.D. theses), except as included in section 1. and 2., above; and
4. Faculty teaching activities, such as the preparation and presentation of classroom lectures, examinations, or websites.

II. DEFINITIONS

Allegation refers to any oral or written report of suspected Research Misconduct.

Complainant is a person who makes an Allegation.

Good Faith as applied to a Complainant or witness, means that the Complainant or witness believes that the Allegation made or the testimony given is true based on the facts as that individual understands them at the time. As applied to a committee member, Good Faith means cooperating with the Research Misconduct Proceeding by carrying out duties impartially.

Initial Assessment is an evaluation of an Allegation by the Research Integrity Officer to decide whether an Inquiry is warranted.

Inquiry refers to preliminary information-gathering and fact-finding to conclude whether an Allegation warrants an investigation.

Investigation is the formal development of a factual record and the examination and evaluation of that record to find if Research Misconduct has occurred and, if so, to determine the responsible person(s).

Expenditure of the Evidence is the standard used in determining whether Research Misconduct occurred; i.e., proof by information that leads to the conclusion that Research Misconduct was more likely to have occurred than not.

Research refers to, in any academic discipline, a systematic experiment, study, evaluation, demonstration or survey designed to develop or contribute to general knowledge (basic Research) or specific knowledge (applied and demonstration Research) by establishing, discovering, developing, elucidating or confirming information about, or the underlying mechanism relating to, causes, functions or effects.

Research Integrity Officer (RIO) refers to the institutional official responsible for administering this Policy. At UCLA, the Vice Chancellor for Research and Creative Activities (VCR) serves as the RIO, except that the Vice Chancellor, Academic Personnel will serve instead if, in a particular Research Misconduct Proceeding, the VCR has a conflict of interest or is unavailable.

Research Misconduct is the Fabrication, Falsification, or Plagiarism in proposing, performing, or reviewing Research, or in reporting Research results. It does not include honest error or differences of opinion.

- **Fabrication** is making up data or results and recording or reporting them.
- **Falsification** is manipulating Research materials, equipment or processes, or changing or omitting data or results, such that the Research is not accurately represented in the Research Record.
- **Plagiarism** is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit, but is not a dispute among collaborators about authorship or credit.

Research Misconduct Investigator is a person designated by the RIO to assist in conducting a Research Misconduct Proceeding.

Research Misconduct Proceeding refers to any formal University action (or other action by a Research Sponsor with regulatory responsibility) related to an Allegation, including but not limited to UCLA's receipt of an Allegation, Initial Assessment, Inquiry, Investigation or determination by the RIO.

Research Report is the record of data or results that embody the facts resulting from Research, including but not limited to Research proposals, laboratory records (both physical and electronic), progress reports, abstracts, status, oral presentations, databases, internal reports, books, and journal articles, as well as any documents and materials provided to the Research Sponsor or to UCLA, or its employees, by a Respondent in the course of a Research Misconduct Proceeding.

Research Sponsor is a governmental or non-governmental entity that funds Research, such as the Public Health Service, the National Science Foundation or the American Cancer Society, or that has oversight responsibility for Research Misconduct, such as the Office of Research Integrity of the U.S. Department of Health and Human Services (ORI).

Respondent is a person against whom an Allegation of Research Misconduct is directed or who is the subject(s) of a Research Misconduct Proceeding.

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

B. POLICY STATEMENT

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

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

IV. PROCEDURES

A. Reporting Allegations of Research Misconduct

Anyone may report, either orally or in writing, suspected Research Misconduct against one or more persons. Such Allegations should be reported to the RIO. If an Allegation is received by another University administrator, it should be promptly reported to the RIO.

If an Allegation is identified in the course of another University process, such as an audit, it should immediately be reported to the RIO who will promptly initiate a Research Misconduct Proceeding regardless of the conduct or outcome of the other process.

Not all wrongdoing related to Research is Research Misconduct, but it may still violate other University policies (e.g., the Faculty Code of Conduct, the UCLA Student Conduct Code, or the UC Personnel Policies for Staff Members), including misuse of University funds, facilities and resources, misuse of human subjects, breach of confidentiality, conflicts over authorship, conflicts of interest, conflicts of commitment, misuse of animals, etc.

B. Initial Assessment

1. Receipt of an Allegation. Upon receiving an Allegation, the RIO will, if possible within two (2) weeks, make an Initial Assessment to decide whether an Inquiry is warranted.
- An Inquiry is warranted if there is a reasonable basis for concluding that: a) the Allegation falls within the definition of Research Misconduct; b) the Allegation is sufficiently serious, credible and specific so that potential evidence or witnesses may be identified; c) the Allegation is made against a person to whom this Policy applies; and d) the alleged Research Misconduct occurred within a limitation period, as defined below.
2. Decision That an Inquiry Is Warranted. If the RIO decides that an Inquiry is warranted, the RIO will initiate an Inquiry, as provided in section IV.E. If, however, there is sufficient evidence because the Allegation

arose out of another process, such as an audit of a clinical trial, the RIO may use that evidence to initiate an Investigation without an Inquiry.

In addition:

- If the Respondent is an academic appointee, the RIO will notify the Vice Chancellor, Academic Personnel;
- If the Respondent is a student, the RIO will notify the Dean of Students who may temporarily withhold a diploma or transcript, with concurrent notice to the Dean of the Graduate Division in the case of a graduate student;
- If the Respondent is a postdoctoral scholar or visiting scholar, the RIO will notify the appropriate academic dean, with concurrent notice to the Dean of the Graduate Division and the Associate Vice Chancellor, Campus Human Resources;
- If the Respondent is a staff member, the RIO will notify the Associate Vice Chancellor, Campus Human Resources;
- 3. Decision That the Research Misconduct Proceeding Should Be Closed. If the RIO decides that an Inquiry is not warranted, the RIO will close the case pursuant to section IV.H. Prior to closing the case, the RIO will include in the file: a) written documentation summarizing the Allegation, b) identification of the source of Research support, and c) explanation, in light of the relevant criteria, of the reasons for the determination in sufficient detail so that if a Research Sponsor subsequently reviews the case file, they understand why the decision was made.
- The RIO may refer the matter to other campus offices, as appropriate.
- 4. Notice to Respondent. Within a reasonable time period and prior to the start of an Inquiry, if any, the RIO will provide the Respondent with written notice of the Allegation and a copy of this Policy.
- The unavailability of a Respondent for any reason, including voluntary or involuntary separation from affiliation with UCLA, will not preclude or in any way delay the initiation or continuation of a Research Misconduct Proceeding.
- 5. Limitation Period. An Inquiry and Investigation will not be initiated if the Allegation is received more than six (6) years after the alleged Research Misconduct occurred, unless: a) for potential benefit, the Respondent has confirmed or removed any alleged Research Misconduct through the citation, re-publication or other use of the Research Record at issue; b) the Research Sponsor or UCLA, in consultation with the Research Sponsor, determines that the alleged Research Misconduct would possibly have a substantial adverse effect on the health or safety of the public; or c) the Research Sponsor's policy provides an alternative limitation period.

C. Securing of Evidence

With the assistance of a Research Misconduct Investigator, representatives from Audit & Advisory Services, Campus Counsel, the Inquiry Committee or others, the RIO will take reasonable, practical, and prompt steps to obtain custody of inventory and securely sequester all Research Records and evidence required to conduct the Inquiry and Investigation. To the extent possible, this will be done before Respondents are notified of Allegations of Research Misconduct. If this includes data on instruments shared among a number of users, copies of that data may be secured instead, provided that those copies are substantially equivalent to the evidentiary value of the instruments. Research data generated during the course of UC research is owned by The Regents regardless of where it resides or its form (electronic or hard copy).

At each stage of these proceedings, those responsible for conducting the Inquiry and Investigation will notify the RIO if and when additional evidence is identified that needs to be secured and retained (see section IV.D.2.).

The RIO will securely maintain such data and evidence, as well as the records of an Initial Assessment and the Inquiry and Investigation Committees, for seven (7) years after the completion of a UCLA Research Misconduct Proceeding, unless custody of the records has been transferred to a Research Sponsor or a Research Sponsor has notified UCLA that the records are no longer needed. The Respondent will receive copies of, or supervised reasonable access to, the Research Record to prepare a response and continue conducting Research.

D. General Standards for Inquiry and Investigation Committees and Administrators

1. Selection Criteria. An Inquiry Committee (see section IV.E.1) and an Investigation Committee (see section IV.F.1) will consist of individuals with the appropriate scientific expertise to evaluate the evidence and issues related to the Allegation, but will not include, if practicable, the Respondent's chair or division chief, others who are directly responsible for the Respondent's work, and those who have unresolved personal, professional, or financial conflicts of interest with persons involved with the Inquiry or Investigation. Individuals appointed to the Investigation Committee may also have served on the Inquiry Committee.
2. Continuing Obligations. Inquiry and Investigation Committees are under a continuing obligation to:
 - Identify and secure any unsecured evidence relevant to the Inquiry or Investigation and to notify the RIO under section IV.D.1;
 - Notify the RIO if additional Allegations or additional Respondents are identified;
 - Notify the RIO if the Respondent makes an admission of guilt or wishes to enter into settlement discussions (see section IV.H.); and
 - Ensure thorough, competent, objective, and fair Inquiries and Investigations, which may include interviewing available principals and key witnesses.
3. Notify the RIO. Notify the RIO if there is reason to believe that, as a result of the alleged Research Misconduct, the health or safety of the public is at risk; there is an immediate need to protect human or animal subjects; federal resources or interests are threatened; Research activities should be suspended; there is reasonable indication of a possible violation of civil or criminal law; federal action is required to protect the interests of those involved in the Research Misconduct Proceeding; the Research Misconduct Proceeding may be made public prematurely, and notice would afford the federal government the opportunity to take appropriate steps to safeguard the evidence and protect the rights of those involved; or the Research community or public should be informed.
4. Confidentiality. To the extent possible, UCLA and all participants in a Research Misconduct Proceeding should limit disclosure of the identity of Respondents and Complainants to those who need to know, provided that this limit is consistent with a thorough, competent, objective and fair Research Misconduct Proceeding and consistent with University policy and the law. Except as may otherwise be prescribed by applicable law and University policy, and as necessary to conduct a Research Misconduct Proceeding, confidentiality must be maintained (e.g., through the use of redaction) for any records or evidence from which Research subjects may be identified.

E. Inquiry

1. Appointment of Inquiry Committee. Following a decision to initiate an Inquiry (see section IV.B.), the RIO will appoint an Inquiry Committee consisting of one or more persons to conduct preliminary information-gathering and fact-finding with respect to the Allegations. With the concurrence of the RIO, this Committee may ask a Research Misconduct Investigator, Campus Counsel, or others for assistance.
2. Notice to the Respondent. At the time of or before initiating an Inquiry, the RIO will make a reasonable effort to provide a written notice about the decision to initiate an Inquiry. That notification will include the identification of those who will conduct the Inquiry. The RIO will advise that to their knowledge, those

- conducting the Inquiry do not have unresolved personal, professional, or financial conflicts of interests with Respondent. Respondents who disagree may submit a written description of the conflict or bias that they believe exists, and any evidence supporting that assertion, within five (5) business days of receiving the notice. The RIO will make the final determination about the composition of the Committee.
- 3. Conduct of an Inquiry Committee:** An Inquiry Committee must complete its work, including the preparation of and transmission to the RIO of its preliminary and final reports, within sixty (60) days of its appointment unless an alternative time period is specified in the Research Sponsor's policies or the RIO grants an extension of the time period in response to a written request from the Inquiry Committee stating the basis for request for an extension.

The following table lists the sequential actions to be taken in conducting an Inquiry and the individual or group with responsibility for each action:

RESPONSIBILITY	ACTION
RIO	Appoints an Inquiry Committee, see section IV.E, and charges the Committee in writing and, if appropriate, also in person. Provides Respondent written notice of the decision to initiate the Inquiry.
Inquiry Committee	Engages in preliminary information-gathering and fact-finding, as provided in sections IV.C & D and may, but is not required to, conduct interviews of available principals and key witnesses. If interviews are conducted, each interview will be recorded or transcribed, a copy of which will be provided to the interviewee for annotation and correction, which in turn will be included in the record of the investigation. It, based upon that fact-finding, the Committee concludes that: 1) there is a reasonable basis for concluding that the Allegations fall within the definition of Research Misconduct; and 2) the Allegations may have sufficient substance, then the Committee will recommend to the RIO that an investigation is warranted. Prepares a Preliminary Inquiry Report for the RIO that includes: <ul style="list-style-type: none"> • the name and position of the Respondent; • a Description of the Allegations; • the basis for concluding whether an investigation is warranted; and • a description of any extramural support for the Research at issue (e.g., the proposal, grant or contract number, or publications that cite such support). Within sixty (60) days of appointment, forwards a copy of the Preliminary Inquiry Report to the RIO.
RIO	Transmits the Preliminary Inquiry Report to the Respondent.
Respondent	Within two (2) weeks of its receipt, may submit to the RIO a written response to the Preliminary Inquiry Report for transmission to the Committee.
RIO	May prepare comments as to whether the Committee's actions and Preliminary Inquiry Report satisfy this Policy, and transmit those comments (if any) to the Inquiry Committee along with any written response that the Respondent submitted.
Inquiry Committee	Considers any comments provided by the Respondent and RIO, making changes as the Committee feels appropriate, and submits to the RIO its final Inquiry Report with the Respondent's response attached.
RIO	Within two (2) weeks of receiving the Inquiry Report, issues a written decision on whether to accept the Committee's conclusion as to whether an investigation is warranted.

- 4. Evidentiary Standards:** A finding of Research Misconduct requires finding that the alleged Research Misconduct: a) represents a significant departure from accepted practices of the relevant Research community; b) was committed intentionally, knowingly, or with reckless disregard of the facts; and c) was proven by a Preponderance of the Evidence.

Evidence of Research Misconduct may include showing, by a Preponderance of the Evidence, that: a) the Respondent intentionally, knowingly, or recklessly destroyed Research Records, had the opportunity to maintain them but did not do so, or maintained them and failed to produce them to the RIO in a timely manner; and b) such actions constitute a significant departure from accepted practices of the relevant Research community.

The Respondent has the burden of proving by a Preponderance of the Evidence any and all affirmative defenses raised, including proof of honest error or that a difference of opinion occurred. The Respondent also has the burden of going forward with and proving, by a Preponderance of the Evidence, any mitigating factors that are relevant to a decision to take administrative actions, including sanctions and discipline, following a Research Misconduct Proceeding.

The following table lists the sequential actions to be taken in conducting an Investigation and the individual or group responsible for each action:

RESPONSIBILITY	ACTION
RIO	Appoints an Investigation Committee, see section IV.F., and charges the Committee in writing and, if appropriate, also in person.
Investigation Committee	Conducts an Investigation, as provided in sections IV.D & F. Conducts interviews of each Respondent, Complainant, and other available persons who have been reasonably identified as having relevant information, including witnesses and co-authors. Each interview will be recorded or transcribed, a copy of which will be provided to the interviewee for annotation and correction, which in turn will be included in the record of the investigation. Considers the arguments and evidence submitted by the Respondent. With the concurrence of the RIO, may ask a Research Misconduct investigator, Campus Counselor, or others for help in information-gathering and presenting evidence. Prepares a Preliminary Investigation Report for the RIO that includes: <ul style="list-style-type: none"> • the specific Allegations being considered in the investigation, and a list of all Allegations made; • Identification and summaries of the Research Records and evidence reviewed, as well as identification of evidence taken into custody but not reviewed; • For each Allegation, 1) a finding (based on the appropriate evidentiary standard) of whether Research Misconduct occurred, whether it involved Fabrication, Falsification, or Plagiarism, and whether it was intentional, knowing, or in reckless disregard of the facts, and 2) a summary of the facts and analysis that support each such finding, including a consideration of any explanation by the Respondent; • For each Allegation, identification of any publications that need to be corrected or retracted; • For each Allegation, a description and documentation of extramural support and known applications or proposals for support, including the proposal, contract or grant number, Research Sponsor, or publications being extramural support. Provides the Respondent with a copy of the Preliminary Investigation Report and a copy of, or supervised access to, the evidence upon which the Preliminary Investigation Report is based.
RIO	

RESPONSIBILITY	ACTION
RIO (cont'd.)	Provides the Respondent a copy of that written decision and of the Inquiry Report, along with references to this Policy and, as appropriate, the Research Sponsor's policy on Research Misconduct (e.g., PHS Policies on Research Misconduct, 42 CFR Part 93). After notifying the Research Sponsor, if required (see section IV.F.) initiates an investigation (section IV.F.) or closes the proceeding (see section IV.H.).

F. Investigation

- 1. Appointment of Committee:** Within thirty (30) days of the RIO's decision to conduct an investigation, the RIO will appoint an Investigation Committee to determine whether Research Misconduct has occurred, pursuant to the appropriate evidentiary standards.

In appointing the Committee, the RIO will consult with: a) the appropriate chair, director or dean, and b) the Chair of the Charges Committee of the UCLA Academic Senate, if the Respondent is an academic appointee; the Associate Vice Chancellor, Campus Human Resources, if a staff member; the Dean of Students, if a student; the appropriate academic dean, if a postdoctoral scholar or visiting scholar; or an appropriate administrator if the Respondent has some other UCLA affiliation.

The composition of an Investigation Committee will be as follows:

- If Respondent is a member of the Academic Senate, the Committee will consist of three (3) members of the University of California Academic Senate (or more if warranted in the view of the RIO) and, at the discretion of the UCLA Academic Senate Charges Committee, a representative designated by that Committee.
 - In all other cases, the Committee will consist of two (2) or three (3) members of the University of California Academic Senate or more if warranted in the view of the RIO. The RIO has the discretion to appoint an additional member from the Respondent's peer group (e.g., non-Senate academic appointee, visiting scholar, post-doctoral scholar, staff, student, etc.).
2. Notice to Respondent. The RIO will notify the Respondent in writing about the decision to initiate a formal investigation. The notice will include the identification of those who will conduct the investigation and advise that in the RIO's knowledge, none have unresolved personal, professional, or financial conflicts of interest. Respondents who disagree may submit a written description of the conflict or bias that they believe exists, and any evidence supporting that assertion, within five (5) business days of receiving the notice. The RIO will make the final determination about the membership of the committee.

3. Conduct of the Investigation. The Investigation Committee will take reasonable steps to: insure an impartial, unbiased, and thorough investigation, including sufficiently documenting the investigation; comply with section IV.C & D; diligently pursue all significant and relevant issues and leads; and examine all relevant Research Records and evidence, including evidence of additional Allegations.

During the investigation, the Respondent has the right to be represented, but the right of the Respondent and a representative to attend meetings of the Committee is limited to those occasions when the Respondent is being interviewed. If the Respondent elects to have legal counsel, Campus Counsel will also be invited to participate.

An Investigation Committee must complete its work, including the formal development of a factual record and the preparation of and transmission to the RIO of its Preliminary and Final Reports, within one hundred and twenty (120) days of its appointment unless the Research Sponsor specifies an alternate time period within its policies. The RIO may extend that time period, provided that a Research Sponsor, if so required, has assented in writing.

RESPONSIBILITY	ACTION
Respondent	Within thirty (30) days of its receipt, may submit to the RIO a written response to the Preliminary Investigation Report for transmission to the Committee and provide oral testimony and argument before the Committee.
RIO	May prepare comments as to whether the Committee's actions and Preliminary Investigation Report satisfy this Policy, and transmit those comments (if any) to the Investigation Committee along with any written response that the Respondent may have provided.

G. RIO's Determination of Research Misconduct

1. After reviewing the Investigation Report, the RIO:
- Decides (a) whether to return the Report to the Committee for further fact-finding or analysis, or to accept the Report as complete; and (b) if complete, whether to accept some or all of its findings.
 - After accepting an Investigation Report as complete, determines on the basis of that report whether Research Misconduct has occurred and documents that decision in writing in the form of a memorandum to the Chancellor. That determination constitutes UCLA's final finding as to whether Research Misconduct occurred for all purposes, including satisfying its responsibility to Research Sponsors, except for the purpose of imposing sanctions or discipline.
 - Provides the Respondent with a copy of the Investigation Report and written notification of the determination about whether Research Misconduct occurred.
2. After determining whether Research Misconduct has occurred, the RIO:
- If any related matter is pending before the Charges or Privileges and Tenure Committee of the UCLA Academic Senate, may forward to that Committee a copy of that determination and of the Investigation Report.
 - If the Respondent is no longer affiliated with UCLA, for the purpose of making a notation and including that determination and the Investigation Report in the Respondent's personnel or student file, notifies the Respondent in writing of this intended action and of the right to submit a written response for inclusion in the file.
 - Takes steps to ensure that corrections and corrections of any publications are completed, if appropriate.
 - Forwards that written determination and a copy of the Investigation Report (with any necessary redactions) to the following:
 - Vice Chancellor, Academic Personnel and the Charges Committee of the Academic Senate, and thereby files charges in accordance with APM-016 and UCLA Academic Senate Manual, Appendix XII, if the Respondent is a member of the Academic Senate;
 - Vice Chancellor, Academic Personnel for appropriate action under APM-150, if the Respondent has an academic appointment but is not a member of the Academic Senate;
 - Office of the Dean of Students (and, in the case of a graduate student, the Graduate Division) for appropriate action, if the Respondent is a student;
 - Dean of the Graduate Division for appropriate action under APM-390, if the Respondent is a postdoctoral scholar and the Associate Vice Chancellor, Campus Human Resources;
 - Associate Vice Chancellor, Campus Human Resources for appropriate action in coordination with the authorized organization head, if the Respondent holds a staff or management position;
 - Appropriate administrator if the Respondent has some other affiliation with UCLA; and/or

- Notifies the relevant academic dean and others who have a need to know.
3. If determining that Research Misconduct was not found, the RIO:
- If requested by the Respondent, makes reasonable efforts to restore the position and reputation of Respondent, including making diligent efforts to make known the outcome of the Research Misconduct Proceeding to appropriate individuals and organizations identified in consultation with the Respondent.
 - Forwards a copy of that determination and a copy of the Investigation Report to others with a need to know (such as the Vice Chancellor, Academic Personnel and the Chair of the Charges Committee of the Academic Senate, Office of the Dean of Students, Dean of the Graduate Division, and Associate Vice Chancellor, Campus Human Resources).

H. RIO's Closing of a Research Misconduct Proceeding

The RIO will ensure that each Research Misconduct Proceeding is completed pursuant to this Policy. A Research Misconduct Proceeding will be closed after the RIO's:

1. Initial Assessment that an Allegation does not warrant an Inquiry (see section IV.B.);
2. Acceptance of an Inquiry Report's conclusion that there is insufficient specific and credible evidence to warrant an Investigation or that the alleged acts do not fall within the scope of this Policy (see section E.);
3. Determination that Research Misconduct occurred, following an Investigation (see sections IV.F & G.);
4. Acceptance of Respondent's written and signed admission of wrongdoing specifically identifying the data in the Research Record that was Fabricated, Falsified, and/or Plagiarized, and acknowledging that this constitutes Research Misconduct, following the RIO's prior consultation with the Research Sponsor if as required; or
5. Negotiation, at any time during the Research Misconduct Proceeding, of a settlement agreement with the Respondent, following prior: a) consultation with Research Sponsor if so required; b) consultation with appropriate administrators; and c) compliance with UC policies on settlement agreements.

Following the RIO's acceptance of an admission of wrongdoing or a settlement agreement, if any, the RIO will implement, where appropriate, provisions of section IV.G., including determining that Research Misconduct has occurred and taking steps to ensure that retractions and corrections of any publications are completed.

The RIO or designee has a continuing duty, following the closure of a Research Misconduct Proceeding, to:

1. Preserve and maintain evidence and the record of the Research Misconduct Proceeding (see section IV.C.);
2. Protect participants in the Proceeding;
3. Communicate and cooperate with Research Sponsor (see section IV.I.) including, at their request, reopening a closed Proceeding when necessary;
4. Cooperate with other University officials to ensure the imposition of sanctions and discipline, if any (see section IV.G.).

I. RIO's Obligation to Report and Respond to External Agencies Throughout a Research Misconduct Proceeding

Of equal importance to the RIO's duty to administer this Policy at UCLA are duties to external institutions, including Research Sponsors, which arise immediately upon receipt of an Allegation and continue during and after a Research Misconduct Proceeding.

1. Reporting and Implementation Duties to Research Sponsors

The RIO will advise Research Sponsors as required by federal regulations and Research Sponsor policy.

- a. Of an Inquiry Committee's conclusion that an Investigation is warranted; of an Investigation Report's findings, of the RIO's determination whether Research Misconduct occurred; of pending or completed University actions resulting from that determination; and of information requested by Research Sponsors;
- b. Prior to closing a case if the Respondent has admitted wrongdoing, a settlement has been tentatively reached with the Respondent, or for any other reason but not when the RIO closes a case at the Initial Assessment or Inquiry stage on the basis that an investigation is not warranted (see sections IV.B. & H.);
- c. Of a need for an extension of time to complete an investigation, upon determining that an investigation cannot be completed within one hundred twenty (120) days of its initiation unless the Research Sponsor specifies an alternate time period within its policies;
- d. Immediately if at any time there is reason to believe as a result of a Research Misconduct Proceeding that: the health or safety of the public is at risk; there is an immediate need to protect human subjects or animals; federal resources or interests are threatened; Research activities should be suspended; there is reasonable indication of a possible violation of civil or criminal law; federal action is required to protect the interests of those involved in the Research Misconduct Proceeding; UCLA believes that, because the Research Misconduct Proceeding may be made public prematurely, notice would afford the federal government the opportunity to take appropriate steps to safeguard the evidence and protect the rights of those involved; or the Research community or public should be informed;
- e. Other information as a Research Sponsor may lawfully request.

2. Cooperating with Other Institutions

The RIO will coordinate UCLA's Research Misconduct Proceeding with that of any other institution that has a duty to investigate the same or related Allegation of Research Misconduct or otherwise has some jurisdiction over the Research (such as an institution that employs individuals who have UCLA academic appointments, administers UCLA Research support, or provides space, facilities, and/or regulatory oversight of UCLA Research). Such coordination includes, if reasonable and practical: upon receipt of an Allegation, determining whether another institution may have a duty to investigate; notifying the RIO's counterpart at the other institution; conducting a joint Inquiry and Investigation, with, when feasible, one institution taking the lead pursuant to its applicable policy and procedure; and giving and obtaining timely notice of all steps in the joint Research Misconduct Proceeding, including final outcomes and any appeals. However, UCLA must follow its own procedure for making a final determination of Research Misconduct and taking appropriate actions based thereon (see sections IV.D. & H.).

3. Delegating to Governmental Authorities

After consultation with a Research Sponsor if required, the RIO will suspend a Research Misconduct Proceeding if a governmental authority indicates that its continuation may interfere with the government's action.

V. REFERENCES

1. UC Policy on Integrity in Research, June 19, 1990;
2. UCLA Policy 910, Management of Sponsored Projects;
3. Code of Federal Regulations, Title 42, Part 93: Public Health Services Policies on Research Misconduct, as modified, effective June 16, 2005;
4. [UCLA Policy 410 – Non-Consensual Access to Electronic Communications Records](#)

VI. ATTACHMENTS

- A. Other Related Policies, Procedures and Resources.

Issuing Officer

/s/ Michael Levine

Interim Executive Vice Chancellor Research & Prevost

Questions concerning this policy or procedure should be referred to the responsible department listed at the top of this document.

Other Related Policies, Procedures and Resources

University of California

1. University of California Standards of Ethical Conduct;
2. University [of California] Policy on Faculty Conduct and the Administration of Discipline (APM 016);
3. The Faculty Code of Conduct (APM 017);
4. Non-Senate Academic Appointments/Corrective Action & Dismissal (APM 159);
5. Appointment and Promotion – Postdoctoral Scholars, Corrective Action & Dismissal (APM 390-56);
6. Academic Senate Manual, Los Angeles Division: Appendix XII: Campus Procedures for Implementation of University Policy on Faculty Conduct and the Administration of Discipline;
7. University of California Policies Applying to Campus Activities, Organizations, and Students: Section 106.00, Policy on Student Conduct and Discipline; and Section 116.00, Policies Applying to the Disclosure of Information from Student Records;
8. UCLA Student Conduct Code;
9. For exclusively represented employees, procedures of the appropriate Memorandum of Understanding, where applicable;
10. University of California Personnel Policies for Staff Members, Policy 42 - Corrective Action - Professional and Support Staff, and related campus implementing procedures;
11. University of California Policy on Settlement of Litigation, Claims, and Separation Agreements.

Other

1. Report of the Association of American Universities Committee on the Integrity of Research, 1982;
2. Framework for Institutional Policies and Procedures to Deal with Fraud in Research, issued by Association of American Universities, National Association of State Universities and Land-Grant Colleges, and Council of Graduate Schools, November 4, 1988.

Evidence & Evidentiary *Exhibit 35 – Inadequate Workplace Accommodations*

While the University formally attempted to provide accommodations for Gulessarian, the action taken resulted in a placement into another hostile work environment, thereby undermining the intended purpose of the accommodation and failing to provide a safe or supportive resolution.

SF **Frohrip, Shelly** April 24, 2025 at 7:56 AM
FW: accommodations request for interview [Details](#)
To: Discrimination Prevention Office, Cc: Harout Gulessarian

Hello DPO office,

I am forwarding Harout's most recent incident involving his timesheet and pay that he outlines below. I will contact Adriana directly about the accommodation request.

Thanks,
Shelly

Shelly Frohrip
Employee Disability Management Services-Program Manager
Insurance and Risk Management
UCLA Office of the Vice Chancellor & Chief Financial Officer
(424) 258-5242

UCLA Office of the Vice Chancellor & Chief Financial Officer

From: Harout Gulessarian <hkg90@icloud.com>
Sent: Wednesday, April 23, 2025 4:05 PM
To: Frohrip, Shelly <sfrohrip@um.ucta.edu>
Subject: Re: accommodations request for interview

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

Dear Shelly,

Thank you for your recent message regarding the accommodations related to the upcoming interview and the support person request. I appreciate your coordination with Adriana Stevenson to ensure my needs are taken into account, and I acknowledge the accommodations currently proposed.

However, I must respectfully clarify that several key components of my reasonable accommodation request have not yet been addressed. These include but are not limited to:

- 1. Advance Access to Interview Questions** – I have requested that all interview questions be provided to me at least seven (7) days in advance. This is a necessary accommodation that allows me time to process the questions appropriately and provide complete and considered responses in light of my documented disability and the ongoing psychological toll this matter has had.
- 2. Written Format for Responses** – If advance questions are not provided, I respectfully request to provide all responses in writing during the course of the interview/investigation. This is both a reasonable and necessary accommodation and is also a right I expressly reserve.

Evidence & Evidentiary Exhibit 36 – Continued Isolation and Retaliation Following Lateral Transfer

Despite a lateral transfer intended to relieve a hostile work environment, Gulessarian continued to experience isolation and retaliatory conduct, with many of the same individuals influencing the new environment from behind the scenes. The hostility did not end—it was simply relocated, allowing ongoing efforts to undermine and target Gulessarian to persist under the guise of administrative change.



Hi Shelly,

Thank you for reaching out.

At this time, I'm unable to confirm whether I can step out of the lab for a call on Friday at 10:30 AM, as I am currently working in what feels like a hostile environment. I do not know who I am supposed to speak with or get permission from to attend a call like this, and I'm genuinely unsure how to proceed. I spend 8 hours a day alone in the lab with zero tasks, period.

Earlier today, I shared with Angela how ~~isolating and discriminatory the environment has become~~—particularly the way I'm being treated and positioned within the workspace, including conduct like eye-rolling or being placed in a corner with no tasks, if I ask a question it is met with frustration, if I say hello I don't get a response but if another individual speaks they respond happily, basically these conducts feel demeaning and targeted to say the least and its happening everyday.

Given these circumstances, I'm requesting your guidance on how to proceed. I sincerely want to engage with you, but I also want to ensure that I'm protected and supported while doing so.

Also, please kindly provide the details of the accommodations discussed or available in writing, so I have a clear record of what is being offered—I want to ensure I don't forget anything that was said during these intolerable times.

I'm truly disappointed by the ongoing treatment I continue to experience in the Neurobiology Department, which appears to be carried out with clear knowledge, intent, motive, and a sustained pattern of behavior. This situation directly undermines the purpose of the accommodation process, which is meant to remove me from a hostile work environment. Please advise on how to proceed.

Warm regards,
Harout

Evidence & Evidentiary Exhibit 37 – Ongoing Pattern of Suspicious Discoveries of Fraud

Refer to supplemental materials for supporting evidence & evidentiary documentation related to Exhibit 37.1-37.46 and the notes that go with exhibit 37.1-37.46 discussing Research misconduct & fraud.