

Notes: Supplemental Submission of Evidence & Evidentiary Exhibit(s) 37.1 to 37.48 linking and identifying Consortium Group and other identities of respondent(s) – 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 and departmental members, in a role as potential additional Respondents for the investigation beyond merely Bennett Novitch as the sole Respondent responsible for this scientific 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 Gulesserian, 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. Gulesserian

Date of Submission: May 5th, 2025

Supplemented: May 23, 2025

Submitted by:

Harout K. Gulesserian

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:
 - Race
 - Ancestry
 - National Origin
 - Physical Disability
 - Mental Disability
 - Genetic information
 - Medical or Healthcare-Related Conditions
 - FMLA (Family and Medical Leave Act) Rights
 - FMLA Retaliation
 - Whistleblower
 - Reasonable Healthcare Accommodations
 - Reasonable Healthcare Accommodation Retaliation
 - 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, Gulesserian, 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.

Fraud Elements and Associated Exhibits

Exhibit	Fraud Elements	Explanation
<u>Exhibit 37.1: Fraud Elements</u>		
Exhibit 37.1	1, 4	<p>It is submitted and alleged without limitations and among other things as follows: Element 1 (Misrepresentation of a Material Fact): Reference to the Novitch Protocol being potentially too laborious compared to the Gulesserian Protocol (See exhibit 37.1 & Exhibit 37.2). Element 4 (Justifiable Reliance): Request for updated protocols suggests justifiable reliance on the information provided for the upcoming meeting. (See Exhibit 37.1 & 37.2).</p>
<u>Exhibit 37.2: Fraud Elements</u>		
Exhibit 37.2	1, 2, 3, 4	<p>It is submitted and alleged without limitations and among other things as follows: Element 1 (Misrepresentation of a Material Fact): The Novitch Protocol differs substantively from the later-developed Gulesserian Protocol (Compare Exhibit 37.2 with Exhibit 37.22), potentially misleading the recipient(s). Element 2 (Knowledge of Falsity): The fact that Novitch at that time was dealing with a different non-Gulesserian outdated protocol shows that Novitch knew this (See exhibit 37.2) and is later trying to say that Gulesserian's Protocol was in fact the outdated protocol as such (See exhibit 37.30), this shows scienter (knowledge of falsity) by Novitch (and any other connected members of the consortium who were aware of this email (Compare Exhibit 37.2 with Exhibits 37.22 & 37.40 then remind oneself with exhibit 37.8 false narrative change). Element 3 (Intent to Deceive): Forwarding the Novitch Protocol with the intent to obscure differences from the Gulesserian Protocol could show Novitch and Consortium members intent to deceive subsequent audiences (See exhibit 37.40 & Exhibit 37.39). Element 4 (Justifiable Reliance): Dr. Novitch knew that NIH and UCLA could have relied on the forwarded Gulesserian Protocol, making the reliance potentially justifiable by the U.S Government, NIH, California, UCLA, Gulesserian among others.</p>

Exhibit	Fraud Elements
---------	-------------------

Explanation

Exhibit 37.3: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

Exhibit
37.3

1, 2, 3, 4

Element 1 (Misrepresentation of a Material Fact): Dr. Novitch identifies Mr. Gulesserian as the first to work on the relevant cell line in his laboratory (See exhibit 37.3), which is significant because **Gulesserian's protocol had not been invented yet (See exhibit 37.22).** This could suggest that any prior references to methodologies attributed to Gulesserian might have been misrepresented. **Element 2 (Knowledge of Falsity):** Exhibit 37.1 and exhibit 37.2 clarifies that Gulesserian's protocol had not yet been invented, which could imply that if any communication by Novitch and consortium members (which very likely occurred through emails and text messages) is subsequent and post to the Gulesserian-invented protocol which suggested otherwise, then it would have been knowingly false that the consortium was working on the Gulesserian's invented and discovered protocol prior to Gulesserian's accidental discovery and invention of the protocol on 9/11/2023 (see exhibit 37.11 Consortium member stating that Gulesserian will share his SB protocol and See exhibit 37.22 for ACOP manuscript). **Element 3 (Intent to Deceive):** If the **Novitch Protocol** was presented in a way that misrepresents the timing or authorship of methodologies, there may be an **intent to deceive** (See exhibit 37.40 poster exposing trade secret with deception and misleading narratives of false inventors) by suggesting that **Gulesserian's protocol** existed or was involved when it wasn't even accidentally discovered or invented just yet (See exhibit Novitch changing the title of the discovery to Novitch's preferred fraudulent original narrative intent see exhibit 37.8 Novitch being dishonest and fraudulent about the original narrative). **Element 4 (Justifiable Reliance):** Dr. Novitch's identification of Gulesserian's role (See exhibit 37.3) could influence future reliance on **protocols and methods**, especially if UCLA, TDG, the Federal Government NIH or someone else relied on an inaccurate Novitch and/or Consortium fake representations (See exhibit 37.40 poster exposing trade secret + exhibit 37.30 Novitch willfully omits his duty to report to the federal government in violation of UCLA policy 993) of when the protocol was actually created/invented and how (that in fact in reality it was by accident and in reality by Gulesserian and not the other fake narrative invented by Novitch (See exhibit 37.8 Where Novitch states that altering the narrative from accidental to more suitable falsity is better) and furthered by the Consortium with intent to deceive NIH, the federal government, UCLA TDG all in an effort to get more government grants (See exhibit 37.26)

Exhibit	Fraud Elements	Explanation
		<p>and intentionally disseminate the invention/creation to international bad actors who end up patenting something similar at the expense of UCLA, TDG, NIH and the federal government, if Federal or State funds were used in the research – see evidence of Chinese translation of the Gulesserian invented protocol in the lab (Exhibit 37.24 and Exhibit 37.27 and exhibit 37.28) – arguably there is no need to translate the Gulesserian protocol by hand in Chinese language on a notepad in the all English speaking and writing UCLA Novitch lab where it was accidentally invented by Gulesserian who does not understand, read, or speak, Chinese, especially prior to a proper disclosure of the potentially patentable new invention to the Federal Government, NIH and UCLA under the Bayh-Dole Act so they can protect the newly and accidentally discovered trade secret/invention/creation by filing a one pager with the US Federal Patent office via UCLA TDG patenting the invention totally following Regents Policy 5105 and Provost Browns Objectives underscoring the purpose of Regents Policy 5105– although too early to state at this point, but in fact ironically this may very well have led to the Chinese government getting the benefit of the USA funded Gulesserian accidental invention because the timing of a patent in the Chinese patent data bank appears remarkably near in causal link and proximate time to when Novitch and the Consortium members began broadcasting the new “accidental” Mistake” “Serendipitous” finding/invention/creation trade secret regarding the small molecule SB 590885 in stem cell models– see the Chinese Government Patent) (See Exhibit(s) 37.27 & 37.28).</p>

Why is it important that Novitch admits having knowledge, intent, and motive, as to the value of the “Serendipitous” finding/invention/creation? (See exhibit 37.31 Because at minimum it can be defined as a “Trade secret”, arguably. Moreover, even beyond a trade secret taking the shape of a patent arguably because: “ It should be recognized that serendipitous discoveries are of significant value in the advancement of science and often present the foundation for important intellectual leaps of understanding.”

A) <https://pubmed.ncbi.nlm.nih.gov/16179740/>

B) <https://www.uspto.gov/subscription-center/2024/serendipity-sharpened-focus>

Exhibit	Fraud Elements	Explanation
---------	----------------	-------------

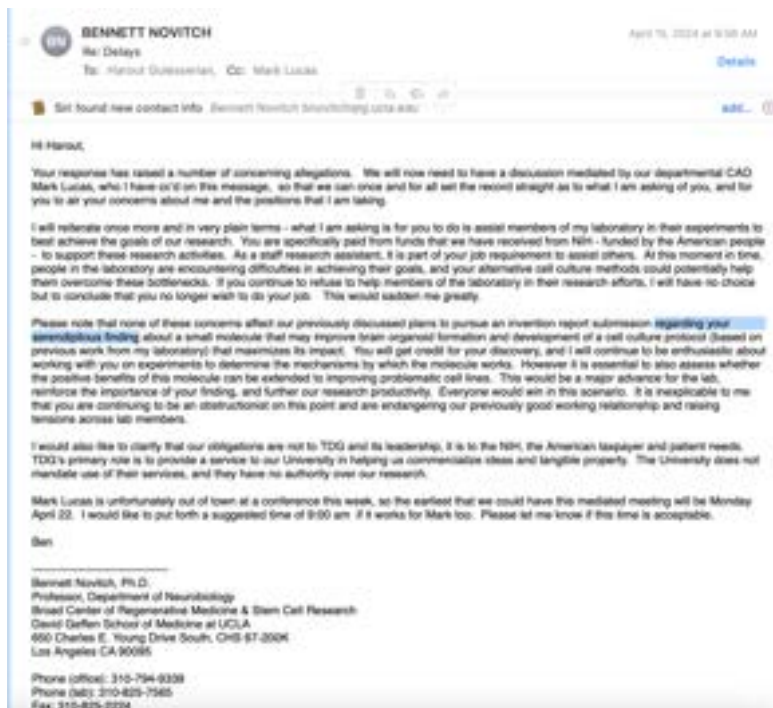
See “SERENDIPITY” links attached below. And incorporated by reference:



Below is a Novitch admission email about the serendipity of Gulesserian’s discovery with Mr. Mark Lucas cc’d in on the email (Lucas became a party this day; not a mediator) (See exhibit 37.30)

Exhibit Fraud Elements

Explanation



C) <https://pubmed.ncbi.nlm.nih.gov/16179740/>

D) <https://www.uspto.gov/submission-center/2024/serendipity-sharpened-focus>

Exhibit 37.4-5: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

Exhibits
37.4 – 1, 4
37.5

Element 1 (Misrepresentation of a Material Fact): If the meetings include discussions or decisions based on inaccurate protocols, it could be seen as a **misrepresentation** of the existing methodologies (See exhibit 37.1, 37.2, 37.4-5, then compare with the 37.11 statements from Jacqueline Martin and contrast with Exhibit 37.32 Gulesserian's ACOP manuscript delivered to TDG). **Element 4 (Justifiable Reliance):** The consortium group meetings indicate that the **core contributors** were involved in discussing protocols, having knowledge of the "Serendipitous" Accidental Gulesserian discovered invented protocol (Exhibit 37.11 & exhibit 37.12) and all prior non-Gulesserian "laborious" Non-Gulesserian Protocols (See exhibit 37.1 & 37.2). These consortium

Exhibit	Fraud Elements	Explanation
		<p>core contributors likely relied on the information presented and like had knowledge to know the difference between the “Serendipitous” “Accident” Gulesserian invented protocol and the “laborious” non Gulesserian protocols (See exhibit 37.1 compare with exhibit 37.16 where Gulesserian put the entire Novitch lab on notice), thus arguably making their subsequent misrepresentations matters where NIH, UCLA, State and Federal governments could have justifiable reliance, especially if the Federal Government, State Government, UCLA and all other stakeholders were arguably misled by the Consortiums false representations of the protocols or their status just so they can get more Federal or State Grant money (See exhibit 37.26, 37.36, 37.40).</p>

Exhibit 37.6: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

Exhibit 37.6	1, 2, 3, 4	<p>Element 1 (Misrepresentation of a Material Fact): The creation of the Gulesserian Protocol on 9/11/2023 as a result of a lab accident is significant because it directly contradicts earlier representations of protocol development, including any prior claims of Gulesserian's involvement in protocol creation before this date. Element 2 (Knowledge of Falsity): If any prior representations suggested that Gulesserian's protocol existed before 9/11/2023, those representations would have been knowingly false, establishing scienter. Element 3 (Intent to Deceive): There could be an intent to deceive if someone presented the Gulesserian Protocol as having existed or been developed before 9/11/2023, when it was only established after the laboratory “accident” by Gulesserian thus making it a “Serendipitous Finding.” Element 4 (Justifiable Reliance): The investors (if any, but likely the Federal Government, NIH, NIMH, CIRM, the State of California, all arguably could have relied on the fake narrative originally envisioned and created by Novitch (See fake narrative email Exhibit 37.8) and sadly the fake</p>
--------------	------------	---

Exhibit	Fraud Elements	Explanation
		narrative is only seeming knowingly and intentionally with motive to get more grant money further by the consortium (See exhibit 37.26 & 37.36) -- who furthers the Novitch fake narrative -- instead of the Gulesserian real “accident” serendipitous “narrative,” (see Zoom Meeting Discussing video and recorded of Consortium Zoom meeting dated: 11/15/2023 then if possible try to view UCLA Consortium zoom meeting on 2/26/2024 (See exhibit 37.21) thus leading to justifiable reliance , particularly if the Federal Government, NIH, NIHM, CIRM, and State of California were unaware of the actual timeline and of the accidental serendipitous nature of its creation.

Exhibit 37.07: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

Exhibit 37.7	1, 2, 3, 4, 5, 6	<p>Element 1 (Misrepresentation of a Material Fact): Gulesserian disclosing his discovery to Dr. Novitch on 9/29/2023 may reflect an effort to misrepresent the timing of the protocol's development, especially if prior disclosures suggested an earlier role in the discovery process. Element 2 (Knowledge of Falsity): If prior claims about the timing of the “accident” Gulesserian discovery or the involvement of others (such as Dr. Novitch or other members of the consortium) were false (See exhibit 37.8) scienter would be established. Element 3 (Intent to Deceive): The timing of this sandbagged Novitch disclosure might suggest an intent to deceive if there were prior attempts to falsely present Gulesserian’s involvement in developing the protocol earlier than it occurred by accident and not by conscious design as Novitch crafted the fake narrative that the Consortium furthered with full knowledge, intent and motive to get more grant money (See exhibit 37.8, 37.9, 37.11, 37.12, 37.17 & 37.21). Element 4 (Justifiable Reliance): If other contributors or stakeholders relied on Gulesserian’s disclosure regarding the</p>
--------------	------------------	---

**Exhibit Fraud
 Elements**

Explanation

protocol's development or timing, then their reliance could be **justifiable**, especially if they were misled about the actual events and this is entirely in line with Regents Policy 5105 and the relied upon Provost Brown Objectives which further Advancement opportunities for UC personnel. **Element 5 (Damages):** The **2-month reporting period requirement** to the federal government may have been sabotaged by **Dr. Novitch** and the consortium PI's, causing harm if the delay led to financial loss, reputational damage, or compliance issues (see Chinese Government Patent of similar Gulesserian Protocol with causal link at the same time that the SB 590885 Molecule was out of stock and translation into Chinese language in the UCLA Novitch lab regarding Gulesserian's Accidental Gulesserian discovery was happening (see Exhibit Chinese writing and Chinese patent 37.27 & 37.28 along with Sandeep Gupta international partners Exhibit 37.24). **Element 6 (Causation):** If the consortium's actions regarding the reporting period caused **financial or legal consequences** (e.g., penalties for failing to report), there is a **direct link** between the fraudulent actions and the harm suffered by the parties involved, especially if **Gulesserian** relied on the misleading information, and UCLA relied on Bennett Novitch & the Consortium's fake narrative, and Federal government and NIH and NIHM all relied on the Novitch and Consortium fake narrative instead of the real "accident" "serendipitous" of what actually happened when Gulesserian by accident made the discovery of the trade secret, and patentable invention..

Exhibit 37.8: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

**Exhibit
37.8**

**1, 2, 3, 4,
5, 6**

Element 1 (Misrepresentation of a Material Fact): Dr. Novitch's attempt to misrepresent the **Gulesserian Discovery** as a mistake and falsify the origin of the invention constitutes **misrepresentation of a material fact was the origin of the Consortiums subsequent furtherance of falsifying the manner and origin of the discovery**. This includes reframing the discovery's origin to avoid proper reporting and ownership attribution. **Element 2 (Knowledge of Falsity):** Dr. Novitch's actions show **scienter** because he was fully aware of the true origin of the discovery and the legal obligations surrounding its reporting, but still chose to misrepresent it. **Element 3 (Intent to Deceive):** Dr. Novitch's actions demonstrate **intent to deceive** because he deliberately attempted to alter the narrative of the invention's origin and intentionally delayed, denied, thwarted, and precluded compulsory & necessary legal reporting processes which were acted upon in furtherance with the consortium (See

Exhibit	Fraud Elements	Explanation
----------------	---------------------------	--------------------

all of Exhibit 37). This intent is amplified by his clear understanding of the consequences for **UCLA**, the **NIH**, the Federal Government, State of California and **Gulesserian among other stakeholders**. **Element 4 (Justifiable Reliance)**: University stakeholders, **federal agencies**, and others involved may have relied on the false narrative propagated by Dr. Novitch and furthered by the Consortium (See exhibit 37.40 A Consortium Group member on the poster), thus making their reliance justifiable despite the fraudulent misrepresentation of material facts. **Element 5 (Damages)**: The decision to **falsify** the discovery's origin and avoid, thwart, delay, and deny legally required Federal and State reporting requirements obviously **damages** various parties:- **UCLA**, **NIH**, and other stakeholders could suffer **legal penalties, reputational harm**, and potential **loss of funding**.- **Gulesserian**, as the actual inventor, could face **damage to his intellectual property rights**, as well as **personal and professional harm**.- **Reagents policy (5105)** could be **compromised**, affecting the broader research community. **Element 6 (Causation)**: The fraud directly caused the **damages** by preventing proper disclosure and reporting of the **discovery** to the relevant parties, including federal agencies and university stakeholders which would have arguably precluded the Chinese government beating the USA government to the proverbial patent punch, even though likely it was funded by American taxpayers (see Chinese writing and Chinese patent exhibits 37.27, See timing of the molecule being sold out See exhibit 37.28, Bennett's response to the molecule being sold out tagged it with the international partners statement identifying UCLA researchers Sandeep Gupta Bennett Novitch and Samantha Butler all listed See exhibit 37.24.2).

Exhibit 37.09: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

Exhibit 37.9	1, 2, 3, 4, 5, 6	<p>Element 1 (Misrepresentation of a Material Fact): Dr. Novitch attempts to compel Mr. Gulesserian to breach Gulesserian contractual duties to Principal UCLA and to waive Gulesserian's rights to the accidental invention (See Exhibit 37.9, 37.11, 37.12, 37.26, 37.36) and, thus Novitch distributes the trade secret protocol to other labs (See Exhibit 37.40) all the while intentionally thwarting proper reporting of a possible patentable novel serendipitous (See exhibit 37.30) finding, thus misrepresenting ownership and control of the discovery (See all complaints). Element 2 (Knowledge of Falsity): Dr. Novitch was fully aware that Gulesserian held inventor and creator rights to the invention (whatever those may be) (See exhibit 37.8), but intentionally chose to</p>
-------------------------	-----------------------------	---

Exhibit	Fraud Elements	Explanation
		<p>harm employment benefits of Gulesserian and intentionally with malicious motive and intent distribute the protocol illegally (See exhibit 37.40), violating research misconduct policy and laws (UCLA policy 993, policy 925, 925.3 among others). Element 3 (Intent to Deceive): Dr. Novitch's and other consortium PI's actions show an intent to deceive (See exhibit 37.12 and exhibit 37.40), as they sought to undermine Gulesserian's rights by forcing Gulesserian to waive those rights intentionally (See exhibit 37.11, 37.12, among others) while distributing the protocol (See exhibit 37.40) without proper notification to the university and funding agencies per UCLA policy 993 (See UCLA policy 993). Element 4 (Justifiable Reliance): If other labs or contributors received the unreported/unprotected trade secret patentable protocol (See exhibit 37.40, 37.9, 37.11, 37.12), they may have justifiably relied on the information and the belief that the proper legal procedures had been followed, especially if they were unaware of the misconduct. Element 5 (Damages): The damages resulting from Dr. Novitch's and the Consortium PI's actions are significant: - Gulesserian faces potential loss of intellectual property rights and complete career reputational damage. - UCLA and the NIH suffer legal penalties and reputational damage from the failure to report properly and likely, if state & federal taxpayer funds were used, this could likely trigger a Federal Audit and Federal Investigation (Per Bayh-Dole and NIH guidelines) especially with a likely Chinese/Chinese Government misappropriated trade secret and patent issue casually linked to Gulesserian's discovery (see Chinese Patent exhibit 37.27, 37.28, 37.24) - The research misconduct could damage policies and funding relationships with all stakeholders (See UCLA policy 993). Element 6 (Causation): The alleged fraud directly caused damages by precluding the proper reporting of the discovery and involving multiple parties in the misrepresentation of the discovery's origin (See exhibit 37.8).</p>

Exhibit 37.10: Fraud Elements

It is submitted and alleged without limitations and among other things as follows:

Exhibit 37.10	1, 2, 4, 5	<p>Element 1 (Misrepresentation of a Material Fact): Dr. Novitch verbally assures Gulesserian of his rightful authorship and inventorship (see exhibit 37.10) credit but later contradicts these assurances by attempting to have Gulesserian waive his rights (See exhibit 37.30 & 37.25). Element 2 (Knowledge of Falsity): Novitch knew that the rights belonged to Gulesserian, but he knowingly and intentionally with motive attempted to undermine this and bypass the reporting requirements by</p>
------------------	------------	---

Exhibit	Fraud Elements	Explanation
		<p>claiming that more data was needed (See exhibit 37.15), a false requirement. Element 4 (Justifiable Reliance): Gulesserian could have justifiably relied on the verbal assurances from Dr. Novitch, assuming that Federal Government interest, UCLA interest, State of California interest (See UCLA policy 993), and Gulesserian's employment benefits and privileges under the contract, Gulesserian employment rights (See patent agreement), title, and interest, including scholarly author rights and Regents Policy 5105 contributions would be honored in the development and reporting of the discovery without distorting the actual story (see exhibit 37.8). Element 5 (Damages): This misrepresentation harmed many and violates policy 5105 along with violating the stated objectives of Provost Brown underscoring the purpose of UC Regents policy 5105 among other policies, all done by harboring malice an intentionally and knowingly failing to report (See all exhibits), thus failing to follow proper UCLA and Federal Law procedures for invention disclosure (See NIH reporting strict guidelines), thus affecting Gulesserian's intellectual property and potentially leading to legal or reputational damage for both Gulesserian and the university collectively and the United States Government (See Bayh-Dole act).</p>

Exhibit 37.11: Fraud Elements

Exhibit Fraud Elements

Explanation

It is submitted and alleged without limitations and among other things as follows:

Element 1 (Misrepresentation of a Material Fact - Change of Narrative): The narrative changes surrounding the discovery (See exhibit 37.8), and the **Gulesserian Protocol** (See **Exhibit 37.22**) is acknowledged but misrepresented in the context of **Gulesserian's** original work through a false pretense narrative on a fraudulent poster exposure (See Exhibit 37.40).

Element 2 (Knowledge of Falsity - Admission of Harout Protocol): The **Gulesserian Protocol** (See exhibit 37.22) is acknowledged (See TDG communication), which may mislead about its true origin and development timeline (See exhibit 37.8), and about **Gulesserian's involvement** (See exhibit 37.30 how the patent business (following the rules) is driving Mr. Novitch nuts statement.

**Exhibit 1, 2, 3, 4,
37.11 5, 6**

Element 3 (Intent to Deceive - Deceiving Inventor/Creator Rights and Reporting Requirements): **Gulesserian's rights** are intentionally undermined by Novitch (See exhibit 37.8, 37.9, 37.11, 37.26, 37.36, 37.30, 37.40 with the goal of **misleading** (See wiping out of servers for no reason Exhibit 37.45 at the same time) about the discovery's **origin** (See exhibit 37.8) and preventing proper reporting to the **patent office** and other stakeholders, including the **NIH and UCLA** (See **NIH reporting guidelines**) at the same time obtaining federal and state government funds under false pretenses (See exhibit 37.26 and 37.36 then also **Bhaduri's latest consortium grant of \$10.3 million taxpayer dollars among other grants received recently by the institution with these false pretenses** (See CIRM grants, NIH grants, Private grants, among others that were received since **Gulesserian's discovery and manuscript**). **Element 4 (Justifiable Reliance - NIH, UCLA, USA, Gulesserian, and Rules):** All named parties (including NIH, UCLA, USA, and **Gulesserian**) justifiably relied on established rules and procedures for patent and intellectual property reporting (See Bayh-Dole act, See UCLA policy 933, See NIH reporting guidelines) which were intentionally bypassed by the consortium and by Bennett Novitch (See exhibit 37.12, 37.26, 37.36, 37.40).

Element 5 (Damages - Violation of Policy 5105 among others including but not limited to signed contracts): The failure to properly report the invention results in **damages** to all parties involved, including violations of **Policy 5105** (See UC reagents policy 5105) related to research misconduct (See UCLA policy 933) and intellectual property management (See UCLA TDG).

Element 6 (Causation - Scholarly Credit and Patent Dispute):

Exhibit	Fraud Elements	Explanation
		<p>Gulesserian was promised scholarly credit (See exhibit 37.10), but this promise was undermined by the poster leak (See exhibit 37.40) of Gulesserian's discovery and the subsequent actions to foreclose the valuable trade secret/patent (See Bayh-Dole Act), potentially sharing the discovery with foreign governments (See Exhibit 37.24 and 37.27) or international entities and the wiping out of internal servers when it was not necessary (See exhibit 37.45) (Just because Novitch knew his lab and his wife's (Samantha Butlers lab) were likely going to get investigated Bennett Novitch decided that wiping out the servers and memory of the computers; followed by selectively transferring what they wanted to transfer and get rid of all other data to conceal their wrong doings). It appears that the Chinese writing (Exhibit 37.24) found in the lab the Chinese patent (Exhibit 37.27) found during the same time and the molecule being sold out (See exhibit 37.28) are all linked and that there may be links between the servers being wiped that had data similar molecules and methods (See exhibit 37.45) to what was being shown in the Chinese patent (See exhibit 37.27) all occurring post the Gulesserian discovery (See exhibit 37.22 and exhibit 37.8).</p>

Exhibit 37.12: Fraud Elements

Exhibit Fraud Elements

Explanation

It is submitted and alleged without limitations and among other things as follows:

Element 1 (Misrepresentation of a Material Fact - Intentional Foreclosure of Patentability): The consortium intentionally **misrepresented the discovery by foreclosing on its patentability** (See **exhibit 37.12 and Exhibit 37.40**), prioritizing obtaining grants (see **exhibit 37.26 & 37.36**) and potentially **sharing the discovery with international parties** (See **exhibit 37.24 and 37.27**), instead of protecting the IP as required under USPTO regulation, NIH reporting guidelines among others without limits (See Bayh-Dole, UCLA policy 993, See NIH reporting regulations among others).

**Exhibit 1, 2, 3, 4,
37.12 5, 6**

Element 2 (Knowledge of Falsity - Duty to Report and Falsified Narrative): The consortium **knew they had a duty** to report (See exhibit 37.30 allegiance to NIH comment by Novitch) the discovery's potential patentability within **two months of the original invention** (See **exhibit 37.12**). However, the consortium presented a **false narrative** (See **exhibit 37.8**) starting in **October 2023**, with **Novitch** leading the charge was keen on changing the narrative. On **November 15, 2023** (See **exhibit 37.12**), the consortium group **fraudulently disclosed** the discovery to the **NIMH** to obtain grants (See exhibit 37.26, 37.36 & 37.40), despite knowing the proper procedure was not followed (See exhibit 37.16), allowing for misappropriation to occur (See exhibit 37.18, 37.12, 37.26, 37.36, 37.34, 37.38, 37.40 and especially 37.24 and 37.27) of United states partially owned trade secret (See Bayh-Dole Act, See NIH reporting, See UCLA Policy 993).

Element 3 (Intent to Deceive - Deceiving the U.S. Government): The consortium's actions (See exhibit 37.12, 37.26, 37.36, 37.40) **deceive the U.S. government** by precluding **proper protection of the IP funded in part by the federal government through NIH** (See **NIH reporting regulations, See Bayh-Dole Act, See UCLA policy 993**), while simultaneously seeking **lucrative government grants** (See **Exhibit 37.26, 37.36, 37.40, also see Bhaduri \$10.3 million dollar grant**) for something that was already potentially **patentable** (See **patentability of serendipitous findings Sub section exhibit 38**) , undermining both the intellectual property protections and the Bayh-Dole Act and the United States government collectively (See NIH reporting obligations, See Bayh-Dole Act and See UCLA policy 993, among others).

Exhibit	Fraud Elements	Explanation
		<p>Element 4 (Justifiable Reliance - Government's Reliance on Faculty for IP Protection): The government and UCLA rely on faculty and staff to properly report potentially patentable discoveries under the Bayh-Dole Act (See Bayh-Dole-Act and UCLA policy 993 (See UCLA Policy 993 also see NIH reporting guidelines)). The consortium's failure to do so undermines the public trust and puts both the university and government at risk of not fulfilling their property interest obligations (See Chinese patent application exhibit 37.27).</p> <p>Element 5 (Damages - Violation of Legal and Policy Requirements): The failure to disclose the patentability and the fraudulent actions surrounding the discovery (See exhibit 37.8) result in damages to the U.S. government, NIH, UCLA, and Gulesserian, as well as violations of Policy 5105 and legal IP protection standards (See all complaints).</p> <p>Element 6 (Causation - Legal Consequences and Reputational Harm): The failure to disclose the discovery properly leads to legal consequences for the consortium and causes significant reputational harm to UCLA (See UCLA policy 993), the NIH (See NIH reporting guidelines), and Gulesserian (See patent agreement), who loses his right to patent protections and fair recognition for his work to bad faith actors who likely misappropriated Government (See Chinese patent exhibit 37.27).</p>

Exhibit 37.13: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact - Admission of Invention Ownership): Dr. Novitch admits that the invention is Gulesserian's (See exhibit 37.8, 37.30 and 37.13), not Novitch's or anyone's, for that matter (See exhibit 37.16). Novitch acknowledges that Novitch would already know how to make the discovery and wouldn't need Gulesserian for that, highlighting Novitch's false narrative (See exhibit 37.8) of inventorship or knowledge of how to make those organoids (See Exhibit 37.13).</p> <p>Element 2 (Knowledge of Falsity - Request for Improper Training and Disclosure): Novitch knowingly requests training from Gulesserian on Gulesserian's method (See exhibit 37.13), which</p>
Exhibits 37.13 – 37.15	1, 2, 3, 4, 5, 6	

Exhibit	Fraud Elements	Explanation
		<p>indicates a lack of knowledge on Novitch's part (See exhibit 37.8) about the new method (See exhibit 37.22 and compare with exhibit 37.2), further reinforcing that the invention is Gulesserian's (See all exhibits). Novitch then urges Gulesserian to disclose the invention through improper channels (See exhibit 37.9, 37.11, 37.12, 37.26, 37.36, 37.34, 37.38, & 37.30 without limits), directly violating the proper university procedures (UCLA policy 993) and UC Regents Policy 5105. Element 3 (Intent to Deceive - Breach of Contracts and University Policies): By asking Gulesserian to bypass the university's channels (See exhibit 37.9, 37.11, 37.12, 37.26, 37.36, 37.34, 37.38, & 37.30 without limits) and go against the Regents' Policy 5105 (See UC Regents policy 5105) , Novitch intentionally breaches Gulesserian's contracts (See exhibit 37.8), effectively obstructing the correct process of disclosure and patent protection from Gulesserian (See exhibit 37.14).</p> <p>Element 4 (Justifiable Reliance - USA, UCLA, Gulesserian, and Reporting Duty): Gulesserian, UCLA, and the U.S. government rely on Novitch to follow proper disclosure protocols and report the invention's funding information and patentability, which Novitch fails to do by attempting to sidestep the proper procedures (See UCLA policy 993, NIH reporting guidelines, Federal reporting guidelines, Trade secret law, among others).</p> <p>Element 5 (Damages - Violation of Legal and Policy Requirements): The failure to disclose properly and bypass official channels with a false narrative (See exhibit 37.8) causes damages to all parties involved, including the U.S. government, UCLA, and Gulesserian, who loses out on proper intellectual property rights and legal protections (See UCLA policy 993, NIH reporting guidelines and obligations to the United States Federal government and citizens).</p> <p>Element 6 (Causation - Legal Consequences and Reputational Harm): The improper actions of Novitch, the consortium + administrators lead to legal consequences for UCLA and Gulesserian, as the failure to report the invention and funding information accurately jeopardizes the patentability and the institution's compliance with federal regulations, arguably causing significant reputational harm to the institution (See UCLA policy 993, NIH reporting guidelines, Federal reporting guidelines, Trade secret law, among others).</p>

Exhibit 37.14: Fraud Elements

Exhibit Fraud 37.14 Elements

Explanation

It is submitted and alleged without limitations and among other things as follows:

Element 1 (Misrepresentation of a Material Fact - Formal Disclosure of Invention): Mr. Gulesserian formally **disclosed his invention** to UCLA's TDG on **January 12, 2024 (See exhibit 37.14)**, placing UCLA on notice of its federal duties (See exhibit 37.22 for manuscript delivered to TDG). This formal action contrasts with the **consortium's earlier misrepresentation (See exhibit 37.8, 37.9, 37.11, 37.12, 37.18, 37.26, 37.36, & 37.40)** and their failure to disclose the invention properly and intentionally (See all complaints), followed by Novitch wiping out servers when there was no need to wipe out a server with 8tb space (See exhibit 37.45). What is even more intriguing is that only Bennett Novitch (See exhibit 37.45) and Natella Baliaouri; Novitch's graduate student with the steal comments (See exhibit 37.18 & 37.45) have rights to modify the server and delete or accept the files they want to selectively transfer (See exhibit 37.45). Again, wiping out the servers during a complaint/investigation when the computers had enough space for 8tb of data does not make logical sense, paired with the purchasing of external hard drives during the same exact time (See exhibit 37.46)

**Exhibit 1, 2, 3, 4,
37.14 5, 6**

Element 2 (Knowledge of Falsity - Request for Guidance and Official Disclosure): By contacting UCLA and **requesting guidance**, Gulesserian demonstrated that he had taken steps to properly handle his discovery (See exhibit 37.14), while the **consortium** continued to avoid legal and policy compliance (see exhibit 37.12, 37.26, 37.36, 37.40) and Novitch wiped out the servers (See exhibit 37.45). Their failure to **notify UCLA's TDG** on time or follow procedures reflects their **knowledge of falsity** in their prior actions (See UCLA TDG, UCLA policy 993, Patent agreements, among others). **Element 3 (Intent to Deceive - Avoiding Proper Disclosure):** The **consortium's continued failure** to follow proper disclosure procedures (See exhibit 37.40), despite being on notice from Gulesserian (See exhibit 37.16), demonstrates an **intent to deceive** and avoid properly **disclosing the invention** to the relevant stakeholders for obtaining federal government (see exhibit 37.26, 37.36, 37.40, 37.30. among others). **Element 4 (Justifiable Reliance - UCLA and the U.S. Government):** UCLA and the U.S. government rely on the proper disclosure of potentially patentable inventions (UCLA policy 993, NIH reporting guidelines, Federal reporting requirements among others). The **failure to properly report (See exhibit 37.8, & exhibit 37.30)** the invention continues to undermine **UCLA's obligations** under the **Bayh-Dole Act** and risks non-compliance with federal regulations under UCLA policy 993 among others.

Exhibit	Fraud Elements	Explanation
		<p>Element 5 (Damages - Violation of Reporting Obligations and Policy 5105): The failure to properly report the discovery to the relevant stakeholders in accordance with UCLA’s Policy 5105 and federal law results in damages to all parties, including the U.S. government, UCLA, and Gulesserian, who is being denied his rightful protections and recognition (See Bayh-Dole act, See NIH reporting regulations, See Federal government reporting duties, See UCLA policy 993, See UC patent policy among others). Element 6 (Causation - Legal Consequences and Reputational Harm): Gulesserian’s formal disclosure to UCLA’s TDG (See exhibit 37.14) sets a clear causal link to the legal consequences that follow (See Bayh-Dole Act, See UCLA policy 993). The failure to report the discovery properly (See NIH reporting strict guidelines) causes legal consequences for the consortium and results in significant reputational harm for UCLA, as it was placed on notice as early as January 12th 2024, but failed to take appropriate action to protect intellectual property rights partially owned by the Federal government (See Bayh-Dole Act) and was misappropriated for the benefit of foreign countries like China instead of the rightful owner United States Federal Government (See exhibit 37.27).</p>

Exhibit 37.15: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact - Failure to Disclose Properly): Gulesserian urged Dr. Novitch to follow institutional protocols by formally disclosing the discovery to UCLA’s TDG (See exhibit 37.15). The fact that Novitch did not take action reinforces the misrepresentation of the invention’s ownership and patentability (See exhibit 37.15, 37.18, 37.30, 37.26, 37.36, & 37.40).</p> <p>Element 2 (Knowledge of Falsity - Knowledge of Reporting Duties): Dr. Novitch was fully aware of the proper intellectual property guidelines and the reporting duty to UCLA or the NIH (See exhibit 37.15, & exhibit 37.30). Novitch’s failure to act after being put on institutional notice urged by Gulesserian (See exhibit 37.15) & reinforced by TDG CIPO (See exhibit 37.16) shows his knowledge of falsity (also See exhibit 37.8) and deliberate avoidance of the correct procedures (See all complaints) all at the same time attempting to make Gulesserian waive his rights to Bhaduri who had her protocol submitted to TDG (See Bhaduri TDG application also see Bhaduri grant with consortium \$10.3 million taxpayer money).</p>

Exhibit 1, 2, 3, 4,
37.15 5, 6

Exhibit	Fraud Elements	Explanation
		<p>Element 3 (Intent to Deceive - Avoiding Formal Disclosure): By failing to act on Gulesserian's request (See exhibit 37.15, & 37.16), Novitch demonstrates his intent to deceive (See exhibit 37.8) in avoiding formal disclosure and preventing UCLA's TDG from officially taking responsibility for the discovery's patentability (See exhibit 37.15).</p> <p>Element 4 (Justifiable Reliance - Reliance of UCLA and the U.S. Government): UCLA, as well as U.S. Government and Gulesserian, relied on Dr. Novitch to follow the correct steps for reporting the invention's potential patentability (See NIH reporting guidelines, See Bayh-Dole act, See trade secrets, See UCLA policy 993). The failure to do so has resulted in potential harm to UCLA's reputation and violates federal and institutional guidelines (see Bayh-Dole-Act).</p> <p>Element 5 (Damages - Violation of Legal and Policy Requirements): The failure to disclose the discovery properly violates Policy 5105 and federal reporting obligations among others (See NIH federal reporting obligations), leading to damages to Gulesserian, UCLA, and potentially the U.S. government as a Chinese patent is filed regarding the novel discovery molecule by Gulesserian (See exhibit 37.27) followed by the intentional control and wiping out of the servers (See exhibit 37.45).</p> <p>Element 6 (Causation - Legal Consequences and Reputational Harm): The lack of proper disclosure and failure to provide the simple MTA and Sponsor information of the discovery to UCLA's TDG as requested by TDG (See TDG correspondence) has arguably caused legal consequences for UCLA and significant reputational harm to both UCLA and Gulesserian and the federal government (See Bayh-Dole Act, See NIH reporting duties, See UCLA policy 993, See Patent agreement). It also puts UCLA at risk of non-compliance with the Bayh-Dole Act and harms the intellectual property rights of the inventor which may now require federal oversight for non-compliance among other things (See strict NIH reporting guidelines, See Office of Research Integrity guidelines, See UCLA policy 993, see all reporting duties per UCLA TDG).</p>

Exhibit 37.16: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact - Knowledge and Admission): By formally placing the Novitch lab on notice (See exhibit 37.16) regarding UCLA's policies and intellectual property rules (See UCLA TDG CIPPO), Mr. Gulesserian ensured that all lab members, including Dr. Novitch, were made fully aware of the duty to report the invention's patentability and its secrecy (See exhibit 37.16). This establishes knowledge and admission of the responsibilities that had to be followed by all members including but not limited to Cendi Ling, Natella Baliaouri and Jessie Buth (See exhibit 37.38, 37.18, 37.34, 37.39, & 37.40).</p> <p>Element 2 (Knowledge of Falsity - Notice of Duty to Report and Bayh-Dole): The formal notice sent by Gulesserian (See exhibit 37.16), which included CIPPO Arora in the communication blind copied, explicitly outlined the duty to report under the Bayh-Dole Act among other applicable university federal and state laws including but not limited to UCLA policy 993). This notice highlights the knowledge of the lab members, including Dr. Novitch (See exhibit 37.16), about their</p> <p>Exhibit 1, 2, 3, 4, 37.16 5, 6 obligation to follow federal guidelines and properly report any potentially patentable discoveries before exposing the trade secret (See Bayh-Dole Act). Element 3 (Intent to Deceive - Misappropriation and Failure to Follow Protocol): Despite being put on formal notice, the lab members, particularly Dr. Novitch and his consortium friends all failed to follow the duty to report the invention (See exhibit 37.40), and instead continued their misappropriation of Gulesserian's trade secrets (37.12, 37.9, 37.11, 37.26, 37.36 37.38, 37.18, 37.34). This represents an intent to deceive by not properly acknowledging Gulesserian's intellectual property (See NIH reporting requirements, See UCLA policy 993).</p> <p>Element 4 (Justifiable Reliance - Government and Institutional Reliance on Reporting Duty): UCLA, the U.S. government, and Gulesserian relied on Novitch's adherence to the proper reporting protocols for the discovery's patentability under Bayh-Dole Act and applicable federal and state laws and university rules policies and regulations for example UCLA policy 993. The failure to report as per UCLA's policies and federal law undermines the institution's trust and violates the government's reliance on the university's duty to protect patentable inventions (See University of California's Mission).</p> <p>Element 5 (Damages - Violation of Legal and Policy Requirements): The failure to comply with the formal notice (See exhibit 37.16) and report the discovery results in damages to Gulesserian, UCLA, and the</p>

Exhibit	Fraud Elements	Explanation
		U.S. government, potentially including misappropriation of trade secrets (See exhibit 37.27) and violations of Policy 5105, and UCLA policy 993. Element 6 (Causation – To be ruled out: Espionage, Legal Consequences, and Reputational Harm): By failing to follow the correct procedures outlined in the formal notice , the Novitch lab (See exhibit 37.16, 37.18, 37.34, 37.38 and 37.40) is seemingly guilty of espionage, trade secret theft, and misappropriation of intellectual property, which has caused legal consequences and significant reputational harm to UCLA, Gulesserian, and the United States Federal Government among other stakeholders (See strict NIH reporting guidelines, See Bayh Dole act, See UCLA policy 993). This failure also jeopardizes the university’s compliance with Bayh-Dole and exposes them to legal repercussions for not protecting the intellectual property rights of the U.S. government and the inventor and allowing another country (See exhibit 37.27) to beat the USA to its rightful patent.

Exhibit 37.17: Fraud Elements

Exhibit	Fraud Elements	Explanation
		It is submitted and alleged without limitations and among other things as follows:
Exhibit 1, 2, 3, 4, 37.17	5, 6	<p>Element 1 (Misrepresentation of a Material Fact - Waiver of Rights and Circumventing IP Reporting): Dr. Novitch attempted to compel Mr. Gulesserian to waive his rights to the invention by distributing the protocol to Dr. Aparna Bhaduri’s lab (See exhibit 37.17, Bhaduri also submitted her protocol to UCLA TDG) without reporting it to UCLA or the funding agencies (See NIH reporting guidelines). This constitutes a misrepresentation of the ownership and the reporting obligations tied to the intellectual property along with the origin of the narrative of how the discovery was invented (See exhibit 37.8 where Novitch wants to alter the narrative). Element 2 (Knowledge of Falsity - Intentional Bypass of Reporting Duties): Novitch was aware that the invention had patentable potential (See exhibit 37.30) and that it needed to be reported in accordance with UCLA’s policies and research misconduct laws (See all complaints). By attempting to bypass these requirements, he acted with knowledge of falsity, as he knew the proper procedures were being intentionally ignored and bypassed (See consortium poster exhibit 37.40). Element 3 (Intent to Deceive - Deliberate Circumvention of IP Protection): The intent to deceive is evident from the deliberate attempt</p>

Exhibit	Fraud Elements	Explanation
		<p>to distribute the discovery outside of the proper channels by altering the narrative (See exhibit 37.8), which would avoid formal intellectual property protections, reporting (See NIH reporting guidelines) and prevent UCLA from asserting ownership or protecting the invention (See Bayh-Dole Act). Element 4 (Justifiable Reliance - UCLA and Government's Duty to Report): UCLA, the U.S. government, and Gulesserian all rely on researchers, Staff, Administrators and faculty to follow proper procedures for reporting potentially patentable inventions (See UCLA policy 993). Novitch's actions undermine the university's reliance on proper disclosure processes for financial gain (See exhibit 37.26, 37.36, 37.40) and the misappropriation/ theft of trade secrets to external countries like China who now will be profiting from Gulesserian's novel discovery (See Exhibit 37.24 & 37.27).</p> <p>Element 5 (Damages - Violation of Reporting Laws and Misconduct Policies): The attempted circumvention of proper disclosure has resulted in damages to Gulesserian (in the form of intellectual property rights), UCLA (in terms of university policy violations and failure to protect IP), and the U.S. government (in violation of Bayh-Dole and federal regulations concerning intellectual property).</p> <p>Element 6 (Causation - Legal Consequences and Reputational Harm): Novitch's attempt to bypass reporting requirements (See TDG and NIH strict guidelines) has caused legal consequences for both UCLA and Gulesserian. It has also led to significant reputational harm to the university, UCLA's research integrity (See UCLA policy 993), and the U.S. government, especially regarding compliance with intellectual property reporting laws (See NIH reporting) and trade secret laws governed under the Bayh-Dole Act.</p>

Exhibit 37.18: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact - Misappropriation of Intellectual Property): Natella Baliaouri (See exhibit 37.18), a graduate student of Dr. Novitch, was involved in actions that suggested an intent to misappropriate Mr. Gulesserian's intellectual property (See exhibit 37.18, 37.30, 37.39). Baliaouri's communication, made after the group had been placed on notice (See exhibit 37.16), indicates that there was an effort to exploit the discovery without proper authorization intentionally as a coordinated scheme; refer back to Novitch's original intent to alter the narrative to a false and more suitable one (see exhibit 37.8). Element 2 (Knowledge of Falsity - Intent to Exploit Discovery Without Authorization): Baliaouri also part of the consortium group (See exhibit 37.1) which then proceeded to include Cendi Ling (See exhibit 37.38) months after Gulesserian's discovery all acted under the influence of Novitch and his original false narrative (See exhibit 37.8), were aware that the intellectual property was protected by law (See exhibit 37.16) and that proper disclosure was necessary (See exhibit 37.16). However, Baliaouri's communication suggests knowledge of the intent to exploit the discovery illegally (See 37.18, 37.30, & 37.39) without adhering to proper disclosure procedures under NIH and State and federal guidelines rules and laws along with UCLA rules and policies, governing these types of situations (See NIH reporting duties, See UCLA reporting duties, See UCLA policy 993).</p> <p>Element 3 (Intent to Deceive - Bad Faith and Misleading Actions): Baliaouri (See exhibit 37.18), as part of Novitch's lab (See exhibit 37.16), was acting in bad faith by potentially misappropriating the intellectual property and attempting to bypass legal reporting and patent protections conspiring with Dr. Bennett Novitch (See exhibit 37.8). This was likely done with the intent to deceive both Gulesserian and the university regarding the ownership of the discovery (See exhibit 37.8, 37.18, 37.30, 37.39 & 37.12).</p> <p>Element 4 (Justifiable Reliance - Misleading the U.S. Government and UCLA): Both UCLA and the U.S. government rely on university researchers and lab members to follow proper intellectual property reporting procedures (See NIH, UCLA, Federal Government, and State Government reporting laws, See UCLA policy 993, See Bayh-Dole Act, See Patent agreements). Baliaouri's actions (See exhibit 37.18), driven by Novitch's influence, show a deliberate attempt to mislead and exploit the invention (See exhibit 37.39 and 37.40), thereby undermining the government's reliance on the university's disclosure</p>
Exhibit 37.18	1, 2, 3, 4, 5, 6	

Exhibit	Fraud Elements	Explanation
		<p>obligations per the requirements under NIH, Bayh-Dole and University policy 993 along with Office of Research Integrity rules laws and regulations without limits). Element 5 (Damages - Violation of Intellectual Property and Reporting Laws): The misappropriation of intellectual property, combined with the attempt to bypass UCLA's reporting procedures, results in damages to Gulesserian, UCLA, and the U.S. government. Regents policy 5105 among many others were violated, leading to intellectual property theft (See exhibit 37.27), as well as reputational and financial harm to the University, Gulesserian and especially to the United States Government (See Bayh-Dole Act).</p> <p>Element 6 (Causation - Legal Consequences and Reputational Damage): The misleading actions of Baliaouri (See exhibit 37.18, 37.30, 37.39) and the deceptive practices within the consortium (See exhibit 37.40 falsely disguising Gulesserian's discovery) have caused legal consequences for both UCLA and Gulesserian along with the federal government (See trade secret exposure to international partners (see exhibit 37.24) & including those in the republic of China see exhibit 37.27). These actions also will likely lead to reputational damage to the university, as well as potential legal repercussions for violating intellectual property laws, including the Bayh-Dole Act, and UCLA policy 993.</p>

Exhibit 37.19: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact - Misappropriation of Intellectual Property): Mr. Gulesserian formally placed the entire lab on notice regarding the legal and ethical implications of misappropriating intellectual property (See exhibit 37.16 & 37.19). Despite this, the misappropriation continued (See exhibit 37.40), indicating that there was an intent to deceive the rightful inventor and avoid proper disclosure from the start (See exhibit 37.8).</p> <p>Element 2 (Knowledge of Falsity - Awareness of IP Ownership and Duty to Report): Novitch and others in the lab were aware of Gulesserian's ownership of the intellectual property rights and the legal obligations to disclose it to the university and funding agencies</p>
Exhibit 37.19	1, 2, 3, 4, 5, 6	

Exhibit	Fraud Elements	Explanation
		<p>(see exhibit 37.16 & 37.19). Despite being informed by Gulesserian about these responsibilities on numerous occasions (See exhibit 37.16, 37.19, 37.30, 37.15, 37.39), they continued their actions in bad faith (See exhibit 37.40), knowing that the misappropriation was unlawful (See exhibit 37.16 37.19).</p> <p>Element 3 (Intent to Deceive - Continued Misappropriation Despite Notice): The actions of the lab members (See exhibit 37.18, 37.26, 37.34, 37.30, 37.38, 37.40) , especially after being formally placed on notice by Gulesserian (See exhibit 37.16), suggest that they were still intending to deceive Gulesserian and others regarding the ownership and disclosure of the intellectual property or the reporting of the property (See exhibit 37.15, 37.16, 37.30, 37.40) and all the while wiping out the computers and servers (See exhibit 37.45) when there was no need to destroy or alter the evidence (See exhibit 37.45 8tb space comment). This continues the pattern of intentional misrepresentation (See exhibit 37.8) and bypassing all legal duties for gain of grant money (see exhibit 37.26, and 37.36) along with misappropriating the discovery to foreign countries such as china (See exhibit 37.24 & 37.27). Element 4 (Justifiable Reliance - Duty to Report IP Ownership and Obstruction of Reporting): UCLA and the U.S. government rely on researchers, including those in Novitch's lab, to report any potential patentable discoveries in a timely and lawful manner (See Strict NIH reporting guidelines, See TDG reporting guidelines, See Federal government reporting guidelines, See USPTO reporting guidelines, See ORI guidelines for research misconduct, See UCLA policy 993 for research misconduct). Gulesserian's formal notice (see exhibit 37.16& 37.19) highlighted these obligations. Despite this, Novitch and his team sought to obstruct the reporting duties (See all complaints and steal comments), affecting the institutional reliance on their compliance with reporting requirements (See Bayh-Dole Act, See NIH reporting policies, see UCLA policy 993 and its obligations to the Federal government). Element 5 (Damages - Violation of Intellectual Property Rights and Legal Policies): The misappropriation of intellectual property (See exhibit 37.27) and continued failure to report the discovery to UCLA and the funding agencies results in damages for Gulesserian (in terms of lost intellectual property rights) and UCLA (failure to protect the invention), as well as potential legal damages under Bayh-Dole and other federal regulations (See Bayh-Dole Act, See NIH reporting policies, see UCLA policy 993 and its obligations to the Federal government)..</p> <p>Element 6 (Causation - Legal Consequences and Reputational Harm to Parties Involved): Gulesserian's formal notice of the legal implications and unlawful actions (See exhibit 37.16& 37.19) highlights the causation of potential legal consequences for all involved, including Novitch, UCLA, and the U.S. government (See Bayh-Dole Act, See NIH</p>

Exhibit	Fraud Elements	Explanation
		reporting policies, see UCLA policy 993 and its obligations to the Federal government).. These actions could lead to reputational damage to the university and legal repercussions regarding patent law violations (See Bayh-Dole Act, See NIH reporting policies, see UCLA policy 993 and its obligations to the Federal government and trade secret laws).

Exhibit 37.20: Fraud Elements

Exhibit	Fraud Elements	Explanation
		It is submitted and alleged without limitations and among other things as follows:
		Element 1 (Misrepresentation of a Material Fact - Deceptive Intent to Share Discovery Improperly): Dr. Novitch's statement about having contacts in Wisconsin and New York (See exhibit 37.20) with whom he intended to share the discovery prior to any formal disclosure to UCLA's Technology Development Group (TDG) (See exhibit 37.14, 37.16 & 37.19) is a misrepresentation (See exhibit 37.8) of the intellectual property ownership and reporting process (See exhibit 37.15). His actions suggest intentional deceit about proper disclosure channels (See exhibit 37.30; allegiance to the NIH; yet violates NIH strict regulations).
Exhibit 1, 2, 3, 4, 37.20	5, 6	Element 2 (Knowledge of Falsity - Awareness of IP Reporting Requirements): Dr. Novitch knew that Gulesserian had placed him and others in the lab on formal notice regarding the disclosure of the intellectual property to TDG (See exhibit 37.16 & 37.19) . Additionally, the January 20, 2024 notice should have ensured that the discovery was reported correctly and promptly (See exhibit 37.15). Novitch's and Consortiums subsequent actions (See exhibit 37.21, 37.11, 37.12) contradict these reporting requirements (See UCLA patent agreement, See Bayh-Dole act, See UCLA TDG, See UCLA policy 993, See also ORI federal regulations), showing knowledge of falsity . Element 3 (Intent to Deceive - Bypassing Formal Disclosure for Personal Gain): Novitch's overtly hostile in person response to Gulesserian (See exhibit 37.20) and his plan to share the discovery (See exhibit 37.8, 37.9, 37.11, 37.12, 37.26, 37.20, 37.36, 37.40 , 37.38, 37.34) outside of the formal channels suggest intent to deceive the university and the U.S. government by obtaining taxpayer funds (See exhibit 37.30) without reporting discoveries from those governmental funds (See exhibit 37.26, 37.36) in place allowing for the misappropriation to occur (See Chinese patent exhibit 37.27) . This also hints at the possibility of exploiting the discovery for personal gain or by working with external parties outside the approved reporting channels or country (See exhibit 37.24, and exhibit

Exhibit	Fraud Elements	Explanation
		<p>37.27). Element 4 (Justifiable Reliance - Violation of Reporting Duties and Obstruction of IP Disclosure): UCLA and the U.S. government rely on researchers and faculty to properly disclose intellectual property in line with institutional policies (See UCLA policy 993, and TDG reporting requirements). Gulesserian had placed Novitch on notice as early as January 20, 2024 (See exhibit 37.15), yet Novitch's actions to circumvent these duties harmed the reliance that UCLA and the U.S. government place on their staff to follow IP laws and protocols (See NIH reporting guidelines and see Bayh-Dole act, Also see UCLA policy 993, and TDG reporting requirements. Element 5 (Damages - Violation of Contractual Obligations and IP Ownership): By attempting to bypass proper disclosure (See exhibit 37.12, 37.15, & 37.40) , Novitch and the consortium violated not only contractual obligations related to the discovery, but also university policies regarding intellectual property (See TDG, See Policy 993). This resulted in damages to Gulesserian's intellectual property rights, as well as potential legal and financial harm to UCLA, the U.S. government, and other stakeholders due to trade secret theft among other things (See exhibit 37.27). Element 6 (Causation - Legal Consequences and Further Misappropriation of the Invention): Novitch's actions have set in motion the misappropriation of the discovery (See exhibit 37.27 & 37.40), potentially causing long-term legal consequences for all involved parties, including UCLA, Gulesserian, and even the U.S. government (See Bayh-dole act). Novitch's plan to share the discovery with external contacts internally (Consortium group, Butler lab, and others) and externally to other institutions or international countries (See exhibit 37.27), without following the correct known procedures, is a clear indication that Novitch the consortium and Mark Lucas all were misleading the system (See exhibit 37.30, 37.12, 37.40) , which has arguably caused reputational damage to UCLA, Gulesserian and could lead to significant legal repercussions for both UCLA and the consortium group and all others involved in this fraudulent scheme to defraud the government among others (See NIH reporting requirements).</p>

Exhibit 37.21: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact - Coordinating External Interests Over Institutional Obligations): The statements made during the Consortium Zoom meeting, such as “NIMH over UCLA interest” (Geschwind) and “We got each other’s back,” (Bhaduri) indicate a misrepresentation of priorities to the UCLA and the US government (See Bayh-dole Act). The consortium members prioritized external interests (e.g., NIMH grants) over institutional obligations (e.g., UCLA’s reporting duties) to report inventions in a timely manner. Further preventing the institution from timely reporting the invention to the Federal Government (See NIH reporting guidelines, See UCLA policy 993). This suggests a deliberate intent to deceive institutional stakeholders about their true motivations; foreign profits (see exhibit 37.27) while at the same time obtaining government grants (see exhibit 37.26 & 37.36).</p> <p>Element 2 (Knowledge of Falsity - Acknowledging the Violation of Institutional Duties): The consortium members’ statements show an awareness that they were acting outside institutional obligations (See UCLA policy 993). The phrase “We got each other’s back” implies a collective knowledge of their intentional avoidance of proper procedures (See exhibit 37.11, 37.12, 37.26, 37.36, 37.40)., as they conspired to protect each other from the consequences of violating UCLA’s intellectual property policies (See UCLA policy 993).</p> <p>Element 3 (Intent to Deceive - Coordination to Mislead UCLA and the U.S. Government): The statements made in the meeting suggest a coordinated effort to mislead UCLA and the U.S. government about the intellectual property of the discovery (See exhibit 37.8, 37.9, 37.11, 37.12, 37.18, 37.26, 37.36 & 37.40). The consortium members’ decision to prioritize their own interests over proper institutional and governmental reporting reveals intent to deceive and exploit the situation for personal or collective gain especially foreign government gain (See exhibit 37.27).</p> <p>Element 4 (Justifiable Reliance - Violation of UCLA’s Intellectual Property Reporting Policies): UCLA and the U.S. government rely on faculty, staff, and researchers to follow reporting duties and adhere to policies regarding intellectual property (See UCLA policy 993). The misrepresentation and coordinated effort to prioritize personal gain (see exhibit 37.26 37.36, 37.8) over institutional interests (See UC Regents policy 5105, UCLA policy 993, NIH guidelines and rules) undermines this</p>
Exhibit 37.21	1, 2, 3, 4, 5, 6	

Exhibit	Fraud Elements	Explanation
		<p>reliance, potentially causing harm to the university's reputation and its compliance with federal regulations per the rules and guidelines of the NIH (See NIH rules for reporting inventions and discoveries).</p> <p>Element 5 (Damages - Legal and Financial Consequences for UCLA, the U.S. Government, and Gulesserian): The consortium's coordinated effort to bypass proper intellectual property reporting procedures and to mislead stakeholders could result in legal and financial damages (See exhibit 37.27). This includes damages to Gulesserian's intellectual property rights, as well as damages to UCLA and the U.S. government, who could arguably face reputational harm, violations of Bayh-Dole Act, and loss of research grants (See Bayh-Dole Act, UCLA policy 993,, NIH reporting guidelines).</p> <p>Element 6 (Causation - Pattern of Behavior Leading to Misappropriation and Further Legal Repercussions): The actions captured in this Zoom meeting (Exhibit 37.21) reveal a clear pattern of behavior that reflects an ongoing intent to deceive and bypass legal duties to the federal government (See Bayh-Dole, UCLA policy 993 and NIH reporting guidelines). This coordinated effort by Novitch and other consortium supervisors, including potential violations of intellectual property laws, will likely result in legal consequences for all parties involved, including misappropriation of intellectual property and potential espionage (Theft of trade secret laws), as well as further harm to all named stakeholders (e.g., UCLA, U.S. government, and Gulesserian) due to potential loss to foreign county involvement (See exhibit 37.24, and 37.27).</p>

Exhibit 37.22: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact): By comparing Gulesserian's ACOP manuscript (See exhibit 37.22) (submitted to TDG per policy) to Novitch's protocol (See exhibit 37.2) Novitch's forwarded protocol, it is clearly evident that the two are different protocols. Any representation by Bennett Novitch or consortium members that attempt to disguise the discovery of Gulesserian's is factually false (See exhibit 37.40), Consortium PI's and Novitch attempting to disguise Gulesserian's discovery by misleading the audience by meshing 3-4 former protocols as one while displaying Gulesserian's discovery with no IP protection (See exhibit 37.40) but obtaining grants or attempting to (See exhibit 37.26, and 37.36).</p> <p>Element 2 (Knowledge of Falsity): The submission of the ACOP manuscript (See exhibit 37.22) shows that Gulesserian acted in accordance with reporting policy, while Novitch and others continued to act as if the protocol was not distinct or novel (See exhibit 37.40)—despite clear evidence to the contrary (See exhibit 37.30). The consortium had knowledge (See exhibit 37.11 37.12) (or at minimum reckless disregard) of the false equivalency being made between the protocols and the narrative change by Bennett Novitch (See exhibit 37.8) followed by Novitch's unnecessary wiping out of servers even though they had 8tb space on the computer with no need to erase any data from the servers. Furthermore the server password was in Novitch's and Graduate students possession; they controlled the entire system to manipulate what goes in and out (See exhibit 37.45 for Server wiping out emails) .</p> <p>Element 3 (Intent to Deceive): Continuing to promote the consortium's (see exhibit 37.40) while attempting to suppress or reframe Gulesserian's novel protocol (See exhibit 37.22) suggests intentional deception to misappropriate credit and foreclose rightful patent protection while wiping out servers at the same time when it was not necessary (see exhibit 37.45) and at the same time buying external hard drives (See exhibit 37.46).</p> <p>Element 4 (Justifiable Reliance): UCLA and federal stakeholders justifiably rely on faculty and researchers to truthfully disclose original research for purposes of protecting intellectual property (See UCLA policy 993). Gulesserian fulfilled this duty (See PDEH), while others misled the institution through misrepresentation (See all evidence).</p> <p>Element 5 (Damages): Falsely equating Gulesserian's discovery (See exhibit 37.22) with an earlier protocol (See exhibit 37.40) and obscuring its originality threatens patentability (See Bayh-Dole Act), violating UC</p>
Exhibit 37.22	1, 2, 3, 4, 5, 6	

Exhibit	Fraud Elements	Explanation
		<p>Regents Policy 5105, UCLA policy 993, and potentially defrauding the U.S. government, which has an ownership interest via the Bayh-Dole Act and not to just recklessly fund corrupt scientist (See exhibit 37.26 and 37.36) for foreign profits (See exhibit 37.27) among other things . This results in personal, institutional, and governmental damages (See NIH reporting requirements, See UCLA policy 993 and See Bay-Dole Act).</p> <p>Element 6 (Causation): The attempt to override or misrepresent the originality (See exhibit 37.40) of the ACOP protocol (See exhibit 37.22) has a direct link to Gulesserian’s loss of control over his IP, potential suppression of patent rights, and damage to federal compliance systems (See NIH reporting requirements, See Bayh-Dole Act, See UCLA policy 993).</p>

Exhibit 37.23: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact): Dr. Novitch disseminated Mr. Gulesserian’s protocol (See exhibit 37.38 exhibit 37.34), which had been submitted to TDG, without authorization (See exhibit 37.23). Disseminating the protocol while failing to acknowledge the rightful ownership or its patent status is a misrepresentation of its proprietary and legal status which was later disguised using false narratives under a poster (see exhibit 37.40).</p> <p>Element 2 (Knowledge of Falsity): Novitch knew the source of the protocol—UCLA TDG (See exhibit 37.23)—and had knowledge of the institutional and federal duty to maintain its confidentiality pending patent protection (See UCLA policy 993, and TDG). Disseminating it anyway shows reckless disregard or willful ignorance of those responsibilities (See exhibit 37.40).</p> <p>Element 3 (Intent to Deceive): Sharing the protocol without permission, despite knowing the legal implications (see exhibit 37.16), reflects an intent to interfere with Gulesserian’s ownership (Exhibit 37.23) and disrupt the formal Intellectual Property protection process (See UCLA TDG)—with the goal of misleading third parties about who the rightful creator is.</p> <p>Element 4 (Justifiable Reliance): UCLA, the U.S. government, and Gulesserian rely on individuals like Novitch to follow policy and legal obligations when handling potential intellectual property (See UCLA policy 993). The breach undermines that reliance and compromises the university’s ability to protect discoveries and operate under honesty (see policy 993).</p> <p>Element 5 (Damages): Unauthorized sharing violates Regents Policy 5105, Bayh-Dole Act, UCLA TDG guidelines, NIH guidelines potentially nullifying patent claims (See exhibit 37.27), and damages the Federal governments (USA), institution’s (UCLA) and Gulesserian’s ability to benefit from the invention. It also increases risk of Intellectual Property theft (Bayh-Dole Act) , grant fraud, and noncompliance with NIG regulations per the Bayh Dole Act. Element 6 (Causation): Novitch’s actions directly caused harm by derailing the confidential and regulated process of protecting and commercializing new inventions, as outlined by both university and federal policy frameworks (See UCLA policy 993). His breach could permanently undermine the value and control of United States owned Intellectual Property (See exhibit 37.27) to foreign countries.</p>
Exhibit 37.23	1, 2, 3, 4, 5, 6	

Exhibit 37.24: Fraud Elements

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact): The appearance of Chinese-language writing in an English-speaking lab referencing parts of Mr. Gulesserian’s discovery, while appearing innocuous on the surface, suggests the concealed recording or transmission of proprietary information. This raises questions about the lab’s transparency and the true destination or audience for the materials.</p> <p>Element 2 (Knowledge of Falsity): Dr. Novitch, Cendi Ling, and Sandeep Gupta, by being part of this lab environment and facilitating or ignoring this conduct, knew or should have known that any undisclosed documentation in a foreign language—particularly when IP disclosure is pending—violates institutional and federal duties. The fact that external hard drives were purchased, servers wiped, and Chinese patent filings align in timing demonstrates conscious knowledge and preparation to hide or misappropriate data.</p>
Exhibit 37.24	1, 2, 3, 4, 5, 6	<p>Element 3 (Intent to Deceive): The use of non-English documentation, combined with server wiping, external drive use, and lack of disclosure to the university or NIH, signals intent to conceal the invention’s true ownership and possibly divert the discovery for unauthorized foreign use or patent filings. This aligns with espionage, theft of trade secrets, or at minimum, gross negligence with IP security.</p> <p>Element 4 (Justifiable Reliance): The U.S. government, NIH, and UCLA fund and support research with the understanding that discoveries will be disclosed, protected, and kept secure. The use of foreign-language notes referencing the invention, particularly without explanation, undermines that trust and violates the reliance these institutions place on the lab's compliance with protocols.</p> <p>Element 5 (Damages): Unauthorized transmission of potentially patentable information could result in the U.S. government losing ownership rights under the Bayh-Dole Act, UCLA’s loss of commercialization opportunities, and Gulesserian’s total loss of inventor control. Additionally, if a Chinese patent has been filed based on this unlawfully exposed discovery, the United States is materially harmed, and the lab may be complicit in economic espionage.</p>

Exhibit	Fraud Elements	Explanation
		Element 6 (Causation): The deliberate use of foreign documentation, hardware concealment, and erasure of data—prior to formal university reporting—shows a direct line of conduct intended to remove the invention from U.S. ownership paths . This behavior could ultimately invalidate U.S. patent claims , hinder compliance with NIH funding mandates, and expose national research assets to foreign appropriation , causing both domestic and geopolitical harm .

Exhibit 37.25: Fraud Elements

Exhibit	Fraud Elements	Explanation
		It is submitted and alleged without limitations and among other things as follows:
Exhibit 1, 2, 3, 4, 37.25 5, 6		<p>Element 1 (Misrepresentation of a Material Fact): Dr. Novitch essentially instructing Mr. Gulesserian to transfer information related to Gulesserian accidental/serendipitous discovery to Cendi Ling as if it is NOT an accidental/serendipitous finding/discovery/invention/creation rises to arguable false pretenses and culminates in an employment threatening to Gulesserian to move forward with the false and fake narrative created by Novitch (See exhibit 37.8) with intent to force Gulesserian to waive Gulesserian’s rights (See all exhibits). This suggests an intent to bypass institutional procedures and misrepresent the situation to benefit from unauthorized disclosure of the intellectual property (See TDG reporting guidelines and See policy 993, see patent agreement, among other things).</p> <p>Element 2 (Knowledge of Falsity): Dr. Novitch, knowing the university’s policies and IP protection protocols such as UCLA policy 993 or NIH reporting guidelines, with intent knowledge and motive still directed the transfer of sensitive information to Cendi Ling (See exhibit 37.25) all the while thwarting and working towards precluding Gulesserian and others from making proper and legal duty bound disclosures to UCLA’s Technology Development Group (TDG), likely to NIH and the Federal Government as well (See exhibit 37.15). This demonstrates deliberate disregard of the duty to report and protect intellectual property rights to UCLA to NIH and the federal government among other stakeholders (See Bayh-Dole Act).</p>

Exhibit	Fraud Elements	Explanation
		<p>Element 3 (Intent to Deceive): The intent to deceive is clear as Dr. Novitch attempted to force Gulesserian into waiving his rights, a strategy that undermines the inventor's rights and the university's obligations to secure and protect potentially patentable discoveries (See Bayh-Dole Act, UCLA policy 993, UC patent agreement, among others). This could be seen as a way to misappropriate Gulesserian's intellectual property for personal or institutional gain (See exhibit 37.26 grants, 37.36 grants, 37.27 Chinese patent).</p>
		<p>Element 4 (Justifiable Reliance): The U.S. government and UCLA rely on proper disclosure of inventions to maintain compliance with institutional policies, such as the Bayh-Dole Act or strict NIH reporting duties (See UCLA policy 993, see Bayh-Dole act, see NIH reporting duties). By encouraging Gulesserian to waive his rights and bypass the correct channels, the consortium group undermines these obligations, damaging the trust placed in them by the government, UCLA, and the research community per UCLA policy 993 (See UCLA policy 993 among others).</p>
		<p>Element 5 (Damages): By encouraging Gulesserian to waive his rights, the consortium group (See exhibit 37.11, 37.12, 37.9 among others) exposes the intellectual property to potential misuse, including unauthorized external patents and loss of control for the inventor (See exhibit 37.24 & 37.27). This results in potential loss of funding, commercialization opportunities, and damages to UCLA and Gulesserian's professional and financial interests among others (See strict NIH reporting guidelines, See NIH research. Misconduct guidelines, See UCLA policy 993, See UCLA TDG, see all policies at UCLA pertaining to intellectual property).</p>
		<p>Element 6 (Causation): The act of instructing Gulesserian to waive his rights and the subsequent misappropriation of the invention leads directly to the failure to report the discovery, which could have severe consequences, including undermining U.S. patenting processes, violating research agreements, and exposing national research assets to foreign entities or unapproved parties (See NIH reporting guidelines, See UCLA policy 993, See Bayh-Dole Act, See Trade secret laws) .</p>

Exhibit 37.26: Fraud Elements

Exhibit	Fraud Elements	Explanation
Exhibit 37.26	1, 2, 3, 4, 5, 6	<p data-bbox="472 325 1398 388">It is submitted and alleged without limitations and among other things as follows:</p> <p data-bbox="472 436 1409 793">Element 1 (Misrepresentation of a Material Fact): Dr. Novitch's acknowledgment that his lab's existing protocol was inadequate for producing large quantities of organoids (See exhibit 37.26) or being too laborious (See exhibit 37.1), while Mr. Gulesserian's protocol demonstrated superior high-throughput capacity (See Exhibit 37.22), highlights the significant commercial value of Gulesserian's protocol and novelty (See exhibit 37.22). Novitch's decision to pursue grant funding using this new protocol without properly reporting the discovery or acknowledging Gulesserian's ownership misrepresents the true origin of the discovery (See exhibit 37.8, 37.26, 37.36, 37.40).</p> <p data-bbox="472 810 1425 1129">Element 2 (Knowledge of Falsity): Dr. Novitch, by intending to use the discovery for grant funding (See exhibit 37.26 & 37.36) without appropriately reporting it to UCLA or the funding agencies (See exhibit 37.15), knew or should have known (See UCLA policy 993 and exhibit 37.15, 37.30 among others) that failing to properly disclose the intellectual property would violate institutional policies and federal obligations, such as those under the Bayh-Dole Act (See UCLA policy 993, See Bayh-Dole act, See NIH reporting guidelines and also see USPTO reporting guidelines).</p> <p data-bbox="472 1146 1425 1539">Element 3 (Intent to Deceive): The intention behind seeking grants based on the undisclosed protocol without properly acknowledging Gulesserian's rights shows a deliberate intent to deceive the institutions involved (See Exhibit 37.26, 37.36, UCLA policy 993, reporting guidelines to NIH or UCLA TDG). By focusing on grants (See exhibit 37.26 & 37.36) rather than fulfilling contractual obligations (See Patent agreement employment contracts) to report potential intellectual property, Novitch and others may be attempting to secure financial gain for the lab and themselves at the expense of legal and ethical responsibilities to the U.S federal government (See Bayh-Dole Act, See UCLA policy 993, See NIH reporting guidelines).</p> <p data-bbox="472 1556 1414 1877">Element 4 (Justifiable Reliance): UCLA, NIH, and the U.S. government rely on the university's researchers to disclose inventions and innovations that could be patentable to ensure that funding and intellectual property protections are properly managed (See UCLA policy 993, See Bayh-dole act, See NIH reporting guidelines). By withholding the discovery and attempting to gain funding without fulfilling reporting obligations (See exhibit 37.26 and 37.36), the trust of these entities is compromised (See UCLA policy 993), which is a clear violation of their reliance on proper conduct and what the institution stands for (See UCLA policy 993).</p>

Exhibit	Fraud Elements	Explanation
		<p>Element 5 (Damages): By failing to report the invention, Novitch and the consortium among others expose the intellectual property to potential misappropriation (See exhibit 37.24, and 37.27). The U.S. government may lose its rights to the invention (See exhibit 37.27), while the discovery could be exploited by foreign entities (e.g., China), potentially resulting in loss of commercialization opportunities and national security concerns among trade secret violations (See exhibit 37.24 and 37.27). Gulesserian loses both control over his discovery and the opportunity for rightful financial gain per Gulesserian's contracts (See patent agreement).</p> <p>Element 6 (Causation): The actions taken by Dr. Novitch, including pursuing grant funding (see exhibit 37.26 & 37.36) and withholding the proper disclosures or lying about the original narrative of the discovery (See exhibit 37.8), directly caused the failure to secure patent protection under U.S. law (See Bayh-Dole Act). This failure allowed the discovery to be potentially used by foreign entities (See exhibit 37.27), undermining the U.S. government's interest in protecting its intellectual property and jeopardizing the ability to properly commercialize the invention (See UCLA TDG, See UCLA policy 993, see Bayh-dole act, See reporting requirements to the NIH).</p>

Exhibit 37.27: Fraud Elements - Misappropriation of Trade Secrets

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p> <p>Element 1 (Misrepresentation of a Material Fact): The unauthorized sharing and use of Mr. Gulesserian's protocol (See exhibit 37.27), which is considered a trade secret (See Exhibit 37.22), without following the proper legal or institutional disclosure channels (See policy 993), misrepresents the actual ownership of the intellectual property and undermines the necessary steps to protect it (See Bayh-Dole Act). This was done despite clear instructions and agreements regarding the handling of proprietary information (See UCLA policy 993).</p> <p>Element 2 (Knowledge of Falsity): Dr. Novitch and other consortium members were aware (See exhibit 37.12), or should have been aware (See UCLA policy 993), that the protocol constituted intellectual property</p>
Exhibit 37.27	1, 2, 3, 4, 5, 6	

Exhibit	Fraud Elements	Explanation
		<p>under U.S. law and that they had a duty to report and protect U.S government partially owned serendipitous accidental trade secret (See UCLA policy 993, See NIH reporting regulations, See UCLA TDG, without limits).The consortiums PI/management + Bennett Novitch's failure to follow proper procedures—such as bypassing UCLA's Technology Development Group (TDG) (See exhibit 37.16 & 37.15) and sharing the protocol with unauthorized parties (See exhibit 37.17, 37.40, 37.38, 37.18, 37.12, 37.09 37.35)—demonstrates knowledge that the actions taken violated intellectual property laws and UCLA policy 993 among others (See UCLA policy 993, See NIH reporting regulations, See UCLA TDG, See Bayh-Dole-Act, without limits).</p> <p>Element 3 (Intent to Deceive): The deliberate sharing of the trade secret outside (Exhibit 37.9, 37.11, 37.12, 37.15 , 37.17 37.26 among others) of the proper disclosure channels, including international contacts (See Gupta exhibit 37.24, and 37.27 Chinese writing in an all English American speaking USA lab, and Chinese patent filed) (See 37.27) and lab members, with the intent to bypass the reporting requirements for financial or personal gain (See 37.26, &37.36), shows a clear intention to deceive (See all complaints). This conduct likely aimed at gaining benefits from the protocol's commercial value (See exhibit 37.27) without providing credit or compensation to the rightful inventor, Mr. Gulesserian per contracts signed with the employer (See Contracts).</p> <p>Element 4 (Justifiable Reliance): UCLA, the NIH, and the U.S. government rely on researchers to properly protect intellectual property that is developed with public funding per UCLA policy 993 (See UCLA policy 993, See Bayh-Dole-Act, See also strict NIH reporting duties). The intentional misappropriation of trade secrets jeopardizes these institutions' reliance on faculty and staff to act in good faith instead of exposing the Gulesserian Accidental trade secret ACOP protocol (See exhibit 37.40), undermining the US government, California, UCLA, and Gulesserian the ability to manage and protect federally funded research (See Bayh-Dole act, See UCLA policy 993, See NIH guidelines for reporting, without limits).</p> <p>Element 5 (Damages): The misappropriation of trade secrets (See exhibit 37.27) harms not only Mr. Gulesserian, who loses control over his discovery and potential commercial gains among other things (See Regents policy 5105), but also the U.S. government (See UCLA policy 993, See NIH reporting regulations, See UCLA TDG, See Bayh-Dole-Act, without limits) and UCLA (See TDG section of PDEH), which may lose their rightful claims to the invention and potential commercialization opportunities to foreign countries (See exhibit 37.24 & 37.27). If the intellectual property is exploited by foreign entities (e.g., China) (37.27), it could result in national security risks and a significant loss of economic</p>

Exhibit	Fraud Elements	Explanation
		<p>value at the US governments expense per the benefit of a foreign country; essentially violation of trade secrets laws and economic espionage towards the United States Government (See exhibit 37.24 & 37.27, See NIH reporting duties, See Bayh-Dole-Act, See UCLA policy 993, See exhibit 37.35, See exhibit 37.30) for the serendipitous accidental Gulesserian establish novel discovery made in the USA (See 37.22) not China (See 37.27).</p> <p>Element 6 (Causation): The unauthorized disclosure of the serendipitous accidental Gulesserian protocol, including sharing it with international contacts (See exhibit 37.24 & 37.27) and lab members (See exhibit 37.38, 37.40 & 37.34) without proper reporting (See TDG requirements & see NIH reporting requirements, see Bayh-Dole Act), caused a direct violation of the Bayh-Dole Act and other related policies without limits risking at minimum federal government interests (See UCLA policy 993 & NIH reporting duties). This conduct led to the potential misappropriation of U.S. intellectual property (See exhibit 37.27), exposing the invention to foreign exploitation (See exhibit 37.24 & 37.27) and threatening the ability of U.S. entities to protect and commercialize the discovery (See UCLA policy 993). Furthermore, going against the University of California Los Angeles’s mission and commitment to conducting honest research among other things (being honest with the federal government before taking taxpayer dollars from the government; See UCLA policy 993, see USPTO reporting duties, See TDG reporting duties, see Office of Research Integrity regulations, See NIH).</p>

Exhibit 37.28: Fraud Elements - Molecule Sold Out Mysteriously by Top Vendors

Exhibit	Fraud Elements	Explanation
Exhibit 37.28	1, 2, 3, 4, 5, 6	<p data-bbox="467 405 1395 468">It is submitted and alleged without limitations and among other things as follows:</p> <p data-bbox="467 512 1414 835">Element 1 (Misrepresentation of a Material Fact): The molecule SB-590885 being mysteriously sold out by top vendors (See exhibit 37.28) without any formal intellectual property protection (See exhibit 37.28) being in place points to a failure by Dr. Novitch, the consortium to report or secure the necessary protections for the intellectual property (See TDG, See NIH, See Bayh-Dole, and UCLA policy 993. This lack of protection, despite clear protocols, suggests intentional misrepresentation of the ownership and status of the invention leading to foreign benefits rather than US benefit (See exhibit 37.27 Chinese patent filing).</p> <p data-bbox="467 850 1427 1283">Element 2 (Knowledge of Falsity): Dr. Novitch, his lab members, Samantha Butler, Butler lab members as well as other members of the UCLA consortium group (See exhibit 37.11 37.12 37.26, 37.36, 37.40), were fully aware that the invention was a patentable discovery, yet they did not take the necessary steps to protect the intellectual property. The respondent(s) actions—or lack thereof—show that they knew (See exhibit 37.30 allegiance to the NIH statement made by Novitch) they (all respondents) had a duty to protect the US made invention but chose to neglect it, leading to the potential exploitation of the invention by unauthorized vendors like those in china (See exhibit 37.24 and 37.27 and 37.28 for foreign involvement) and other international partners (See exhibit 37.24).</p> <p data-bbox="467 1297 1427 1839">Element 3 (Intent to Deceive): The fact that the molecule SB 590885 is now sold out from top vendors without IP protection (See exhibit 37.28), combined with the prior attempts to bypass proper disclosure and reporting procedures (See all exhibits reported), indicates that there was an intent to allow the Accidental serendipitous Gulesserian discovered protocol to be distributed and the molecule sb590885 randomly to be sold without securing the rightful protections for Mr. Gulesserian's/UCLA's/USA's invention and for the benefit of the United States instead of arguably China (See exhibit 37.27) for patenting rights. This would allow others to profit from the invention through government grants (See exhibit 37.26, and 37.36 without limits) without legal acknowledgment or compensation to the inventor, for the institution, or the value going back to the federal governments investment of United States public funds (UCLA policy 993) by allowing the trade secret to be exposed to foreign agents for foreign financial/ personal gain (See exhibit 37.27).</p>

**Exhibit Fraud
 Elements**

Explanation

Element 4 (Justifiable Reliance): The U.S. government, UCLA, and other stakeholders rely on the university's researchers to disclose, protect, and appropriately manage intellectual property created with federal funding (See UCLA Policy 993). The willful failure and intentional refusal to follow federal and state law along with UCLA rules and policies to protect the discovery as the evidence indicates the sb590885 molecule was wiped out of inventory and not available on market (See exhibit 37.28) during a similar timeframe the Chinese patent was filed (See exhibit 37.27), undermines this reliance and violates the expectations of these institutions (See Bayh-Dole Act and UCLA policy 993, along with NIH reporting guidelines, among other rules).

Element 5 (Damages): The intentional bad acts intended as to precluding the intellectual property allowed bad actors to disclose parts of the Gulesserian protocol, for the profiting of other countries (see 37.24 & 37.27) without compensating the inventor (See 37.22) or adhering to the legal obligations under the Bayh-Dole Act, the NIH guidelines or UCLA policy 993. This gross non-compliance resulted in significant financial damage and harm for Mr. Gulesserian, the U.S. government, and particularly for UCLA, as they lose their rightful stake in the invention being patented by bad foreign actors (See exhibit 37.27). The result of this is likely a federal investigation and interference due to apparent foreign country agent involvement along with federal funds being appropriated (See exhibit(s) 37.27, 37.26, 37.36, 37.40).

Element 6 (Causation): The lack of intellectual property protection, coupled with the failure to report the discovery to the relevant authorities, led directly to the misappropriation of the discovery (See exhibit 37.27), and the molecule SB 590885 was sold out by the top vendors (See exhibit 37.28) during the similar times as the Chinese patent was filed (See exhibit 37.27), the Chinese writing and translations of the novel American made invention into the Chinese language in the all American speaking and English writing Novitch lab (37.24 & 37.27) was discovered among other things including comments about international partners (See exhibit 37.24 Gupta statement includes Bennett Novitch and Samantha Butler among others listed in the publications). This non-compliance even after being put on notice on numerous occasions further undermines the U.S. government's control over federally funded research and opens the door for unauthorized exploitation of the discovery (See exhibit 37.24, 37.27 and 37.40), causing harm to the rightful inventor and the institutions involved including the federal government among others (See Bayh-Dole Act, UCLA policy 993, and all reporting requirements to the NIH), which will now arguably require federal oversight/investigation.

Exhibit 37.29: Fraud Elements – Coercion to Waive IP Rights & Complicity in Misappropriation

Exhibit	Fraud Elements	Explanation
		It is submitted and alleged without limitations and among other things as follows:
Exhibit 37.29	1, 2, 3, 4, 5, 6	Element 1 (Misrepresentation of a Material Fact): Dr. Novitch falsely implied that paperwork required for proper reporting and processing of the discovery would be contingent upon Mr. Gulesserian prematurely sharing his invention (See exhibit 37.12, 37.9 & 37.40). This misrepresents both the process and the legal obligations under university policy 993 and US federal IP law, misleading Gulesserian into thinking consent to share was a procedural requirement. The sharing of a USA made IP prior to following UC policy, state and federal law to protect the USA made IP was a coordinated fraudulent scheme planned intentionally knowingly and deliberately by Bennett Novitch, Samantha Butler, Novitch lab members, Butler lab members, the department of Neurobiology and all of the members in the organoid consortium group at UCLA to defraud the government and the university from their rightful property interests and attempting to diminish Gulesserian’s accidental serendipitous discovery and inventor rights collectively.
		Element 2 (Knowledge of Falsity): Novitch, as a seasoned researcher and supervisor, knew that UCLA policy 993 and the Bayh-Dole Act prohibit withholding Intellectual Property paperwork or conditioning it on unauthorized distribution (See exhibit 37.40). The fact that Dr. Bhaduri had already submitted a patent application for a similar protocol during a similar time window of the serendipitous accidental ACOP Gulesserian protocol suggests prior coordination (See exhibit 37.21), further evidence that Bennett Novitch and the consortium acted with full awareness of the falsehood and illegality of numerous statements (See exhibit 37.8, 37.26, 37.36, & 37.40).
		Element 3 (Intent to Deceive): The conditional offer to sign necessary paperwork only if the discovery was shared externally demonstrates a clear intent to manipulate to expressively to violate law, to expressly use a position of supervisory power to coerce a subordinate to violate law policy procedures and thus deprive the rightful inventor of intellectual property rights, title and/or interests, while funneling proprietary knowledge to another lab in the consortium (See exhibit 37.9, 37.12 & 37.17. Moreover the evidence seems to suggest a coordinated and planned designed scheme to misappropriate the serendipitous accidental Gulesserian ACOP discovery and sidestep institutional safeguards under Bayh-Dole reporting requirement and UCLA policy 993 (See UCLA policy 993) among other federal and institutional reporting guidelines, laws, and rules.

Exhibit	Fraud Elements	Explanation
		<p>Element 4 (Justifiable Reliance): Gulesserian, relying on Novitch’s supervisory role, the Consortiums supervisory/management role and presumed adherence to institutional procedures under UCLA policy 993, Tend to indicate that Gulesserian needed to comply with this coercion to move forward with his (Gulesserian’s) career. In fact, UCLA and the U.S. government also rely on lab leadership (Like Bennett Novitch, Consortium PI’s, Samantha Butler, Mark Lucas) to properly report and protect federally funded inventions per NIH guidelines and the Bayh-Dole act, along with UCLA policy 993.</p>
		<p>Element 5 (Damages): The demand to share proprietary knowledge before TDG protection exposed Gulesserian’s invention to unauthorized appropriation (See exhibit 37.9, 37.11, 37.12, 37.17, 37.26, 37.36, & 37.40). Bhaduri’s protocol submission—potentially containing elements derived from Gulesserian’s work—may compromise rightful inventorship, lead to loss of commercialization value, and expose UCLA and NIH to liability and national reputational harm among other things.</p>
		<p>Element 6 (Causation): The consortiums and Bennett Novitch’s coercive and coordinated demands directly caused the delay and obstruction of proper IP reporting (See all complaints), enabled unauthorized use by others who did not invent (See exhibit 37.18, 37.34, 37.38, 37.40) or discover the discovery, and may result in dual or disputed US patent filings (See Exhibit 37.27). This mismanagement undercuts the legitimate inventor’s rights and exposes federally funded research to unauthorized exploitation.</p>

Exhibit 37.30: Fraud Elements – Obstruction of IP Disclosure and Coercion to Violate Legal Duties

Exhibit	Fraud Elements	Explanation
		<p>It is submitted and alleged without limitations and among other things as follows:</p>
<p>Exhibit 37.30</p>	<p>1, 2, 3, 4, 5, 6</p>	<p>Element 1 (Misrepresentation of a Material Fact): Dr. Novitch misrepresented the legal and institutional process for intellectual property disclosure (See UCLA policy 993 and TDG) by acting as if Mr. Gulesserian’s efforts to report the discovery were problematic or improper (See exhibit 37.15). This concealed the fact that disclosure is a required, lawful step under federal regulations and UCLA policy (See Bayh-Dole and UCLA policy 993) also see federal government reporting duties (See NIH reporting guidelines).</p> <p>Element 2 (Knowledge of Falsity): Novitch was aware of the legal requirement to report potentially patentable discoveries within two months under Bayh-Dole and UC policy per his so called “allegiance” to the NIH (See exhibit 37.30). Bennett Novitch’s and the Consortiums reaction shows not just knowledge of that obligation, but an active, knowing, voluntary & intelligent effort to suppress it. Novitch and co-conspirators knowingly opposed Mr. Gulesserian’s lawful attempts to further the mechanism to report, despite being fully trained and experienced in research compliance, misconduct, among other things.</p> <p>Element 3 (Intent to Deceive): By creating an illegal and hostile work environment, and suggesting resistance to avoid the TDG process, Novitch and the consortium were attempting to convince Mr. Gulesserian to abandon his legal duties and break the law among other things (See PDEH and current complaint). This suggests an intent to suppress rightful reporting, misappropriate the invention, and divert control or benefit toward other parties (See 37.40, 37.38, 37.27, 37.26, 37.36)—including apparent international actors (See exhibit 37.24 and 37.27)—rather than preserving U.S. ownership and protections under the Bayh-Dole Act.</p> <p>Element 4 (Justifiable Reliance): Mr. Gulesserian and government institutions (NIH, UCLA, etc.) reasonably relied on Dr. Novitch & the Consortium PI’s (See exhibit 37.12) to support and uphold legal reporting processes (See UCLA policy 993, See NIH strict reporting institutional duties, See USPTO strict reporting, See also Bayh-Dole-Act). Instead, Novitch sought to coerce a deviation from those duties (37.26, 37.36, 37.39, 37.40), betraying the reliance placed on his leadership and compliance (See exhibit 37.8 and duties to report accidental discoveries to the NIH).</p>
		<p>Element 5 (Damages): This conduct undermines the integrity of federally funded research, potentially resulting in UCLA and the U.S. losing</p>

Exhibit	Fraud Elements	Explanation
		<p>extremely valuable intellectual property rights under policy 993 among others (See exhibit 37.27 exposure to china). It also damages the inventor's standing and deprives the U.S. public of the economic benefits tied to patent and Bayh-Dole protections. Meanwhile, unauthorized parties are profiting from the invention abroad (See exhibit 37.27). Furthermore, this malice and gross non-compliance will also expose UCLA to strict federal investigations for violation of federal laws policies and most importantly for economic espionage and theft of trade secrets among other things covered under the Bayh-Dole-Act without limits among others.</p> <p>Element 6 (Causation): Bennett Novitch's and the Consortium PI's the Neurobiology departments PI's and administrators intentionally planned and active interference and discouragement to report in proper forms directly delayed proper disclosure (See exhibit 37.15), opened the path for foreign exploitation (See exhibit 37.24 and 37.27), and may have prevented the U.S. Government (See Strict 60-days reporting to the Federal government requirement (See also; NIH, See also; what constitutes as research misconduct plus fabrication of the narrative (see exhibit 37.8) with inventor to preclude securing patent rights. Novitch's and the consortiums actions caused legal exposure for the institution and financial losses for the inventor and the federal government by conducting research misconduct among other things (See UCLA policy 993, among other things), and likely opens the door for federal investigations into UCLA for the loss of trade secrets to a foreign country through economic espionage fraud among grant fraud and other avenues of fraud by these bad acting bad actors (See 37.27 Chinese patent).</p>

Exhibit 37.31: Fraud Elements – Complicity by University Official (Mark Lucas)

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>By failing to act on his knowledge of the situation, Chief Administrative Officer Mr. Mark Lucas allowed the appearance that no misconduct had occurred (See exhibit 37.31). This silence constituted a misrepresentation that the lab environment was compliant with university and federal policies, even as violations were ongoing (See exhibit 37.38, 37.40) Lucas’s alignment with Dr. Novitch concealed the true nature of the inventorship dispute and the suppression of proper reporting (See exhibit 37.31, 37.44 then go back to PDEF FMLA portion to see exhibits from April 19th pattern of behavior email where Bennett Novitch lied, and Mark Lucas covered up for Bennett Novitch and Samantha Butler, and never sanctioned to this day for their false statements that was proven or reported to or the false accusations by Samantha Butler, Bennett Novitch among others) (See exhibit 37.31). Thus, intentionally aligning in the discrimination retaliation and other violations of protected classes as raised in the prior complaints (See PDEH, and all complaints) and the evidence of ongoing bad intentional acts including retaliation, discrimination, harassment, plus the withholding of paychecks among other things that continuously materially and negatively harm Mr. Gulesserian and Gulesserian’s employment terms with employer UCLA, knowingly impeding with contracts signed among other things (See all complaints).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>As of April 15, 2024, Mr. Mark Lucas (See exhibit 37.31.4) had direct knowledge of the hostile environment, intellectual property issues, and reporting violations. Despite this, supervisor Mark Lucas’s awareness of the truth and decision to ignore supervisor neutrality satisfies the scienter requirement for fraud and knowledge of the falsity among other things (See exhibit 27.31.6).</p>
Element 3 – Intent to Deceive	<p>By Mark Lucas siding with Dr. Bennett Novitch & Samantha Butler and ignoring UCLA policy breaches, Mr. Mark Lucas effectively enabled an institutional/departamental cover-up and an intent to deceive all parties involved by manipulating the systems and attempting to fire Mr. Gulesserian in a discriminatory manner. Mark Lucas’s failure to take appropriate corrective action suggests an intent to suppress disclosure, avoid accountability, and support the concealment of the invention’s true origin and continue to intentionally deceive the federal government, California, UCLA Gulesserian among other stakeholders. Mr. Lucas and his retaliatory behavior and practices continue to harm Mr. Gulesserian and his employment terms at UCLA.</p>

Fraud Element	Explanation
Element 4 – Justifiable Reliance	<p>Mr. Gulesserian, the University, State, and federal agencies like the NIH justifiably had reasonably relied on internal oversight by individuals like Dr. Bennett Novitch, Samantha Butler, Mr. Mark Lucas and the consortium PI's to enforce compliance of research integrity among other things without limitations. Their inaction breached that trust, worsening the harm and allowing alleged fraud to continue unchallenged and jeopardies; thus the justifiable reliance the government puts into institutions to report novel discoveries.</p>
Element 5 – Damages	<p>The respondent's complicity caused institutional harm, including the prolonged violation of university rules, the erosion of workplace protections, and the exposure of a potentially patentable invention to theft or unauthorized disclosure to foreign countries (see 37.27) prior to USA benefiting from the patent and benefits from their own investments. It further damages Mr. Gulesserian by undermining Gulesserian's efforts to report and protect the novel serendipitous accidental discovery and any intellectual property interests and wage and hour violations among other things.</p>
Element 6 – Causation	<p>Mr. Mark Lucas's failure to act (See 37.30, see 37.44) allowed Dr. Bennett Novitch and Samantha Butler's pattern of behavior to go unchecked. This directly contributed to the continued suppression of IP disclosures, deepened the hostile work environment, and delayed institutional and federal intervention—leading to tangible damages to all affected parties.</p>

Exhibit 37.32: Fraud Elements – Coordinated Knowledge and Exposure of IP Without Reporting

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>Dr. Novitch + the consortium members misrepresented the status (See exhibit 37.8) and origin of the accidental novel discovery of Mr. Gulesserian’s serendipitous finding on 9/11/2023 by presenting it to the NIMH consortium group on or about November 15, 2023 (See exhibit 37.12), without acknowledging its true source or reporting obligations (See also; TDG, See also; NIH) basically hiding the serendipitous (See exhibit 37.8 see also; 37.30) nature of the finding, violating UCLA policy 993, among NIH reporting guidelines among other things (See policy 993 and NIH reporting guidelines). The omission of rightful inventorship and lack of disclosure to UCLA TDG created a false narrative that misled federal officials and bypassed institutional and legal duties per UCLA policy 993 (See UCLA policy 993), arguably violating Federal law.</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>All consortium, Novitch lab, and Butler lab members, department of neurobiology were aware of Mr. Gulesserian’s work and of the fact that it had not been formally disclosed or cleared through proper channels, including without limits proper reporting requirements to the NIH. Their awareness of the invention’s origin (See exhibit 37.11 37.12 and 37.35) and the lack of authorization for its presentation demonstrates conscious knowledge of wrongdoing (See exhibit 37.40) and meets the elements for knowledge of falsity (scienter).</p>
Element 3 – Intent to Deceive	<p>Dr. Novitch’s, the consortiums, and all of the respondents main intent was to bypass institutional channels and secure grants (See exhibit 37.26 and 37.36) and recognition without disclosing the IP to the USA for patenting; thus allowing for misappropriation of USA made trade secrets to foreign agents for foreign benefit on U.S funded research). By doing so at a national forum like the NIMH meeting, with full awareness of the implications (See exhibit 37.12), the consortium demonstrated a motive to defraud the system for personal, professional, and potentially financial gain (See exhibit 37.27, 37.21, 37.26 , 37.36, 37.38, 37.18).</p>
Element 4 – Justifiable Reliance	<p>Institutions like NIMH, UCLA, and the U.S. government rely on researchers veracity and truthfulness to disclose patentable discoveries through proper channels to ensure public benefit, security, and compliance (See Bayh-Dole, and UCLA policy 993, See NIH strict reporting guidelines, See TDG, See USPTO). These entities were intentionally misled into believing the research was compliant and</p>

Fraud Element	Explanation
	<p>properly attributed when it was not properly done so (See exhibit 37.40) for financial gain by willfully omitting Gulesserian from any potential gains and exposing the IP to the public arguably under false pretenses (See exhibit 37.40). Prior to the U.S government getting returns on their federally funded investments for the accidental Gulesserian serendipitous discovery another country seems to be getting all of the benefits that were to be earmarked for the taxpayer of the federal government of the United States of America not for the republic of China (See exhibit 37.27). Made in the USA by Gulesserian (See ACOP manuscript exhibit 37.22).</p>
	<p>USA loss and harmed; UCLA loss and harmed ; Gulesserian loss and harmed</p>
Element 5 – Damages	<p>Improper exposure of an unprotected invention at a federal research meeting may have forfeited the opportunity for UCLA and the U.S. government to secure patent rights, undermining ownership under the Bayh-Dole Act and causing financial and reputational harm to both the inventor and respective public institutions.</p>
Element 6 – Causation	<p>The coordinated knowledge (See exhibit 37.12, 37.36, 37.40, 37.18, 37.36, 37.26) and decision to proceed with disclosure outside official channels caused an intended foreseeable direct harm to IP protections (See exhibit 37.40). This pattern of behavior laid the foundation for fraud/continued misappropriation, and issues due to conversion because parts of the misappropriated trade secret were exposed to a foreign country (See exhibit 37.27) while the remaining parts were exposed through a misrepresented and intended fraudulent changed narrative falsely disguising the serendipitous Gulesserian in a poster (see exhibit 37.40) and weakened NIH/Federal governments, UCLA's, & Gulesserian's inventor's ability to secure ownership or remedy, leading to widespread damages across multiple stakeholders including the US government (See UCLA policy 993), UCLA, among other stakeholders at large due to bad actors attempting to misappropriate USA made scientific intellectual property per Gulesserian's true narrative "accident" discovery and not the fake narrative fabricated by Bennett Novitch on October 2nd 2023 (See exhibit 37.8 for narrative change) and obviously furthered by other respondents per the poster which never once identifies the true "serendipitous" "accidental" nature and origin of the Gulesserian discovered USA made accidental invention on 9/11/2023 in Los Angeles California at UCLA.</p>

Exhibit 37.34: Fraud Elements – Attempts to Recreate Discovery During Protected Leave (FMLA)

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>While Mr. Gulesserian was on federally protected FMLA leave, members of the consortium group and some Novitch lab members attempted to further the fake narrative with intent to omit the truth; that the discovery was not an accident when in fact it was a “serendipitous” finding (See exhibit 37.30, 37.8) and instead of sticking to the true narrative members of the Novitch lab and consortium attempted to distort Gulesserian’s serendipitous accidental novel discovery by hiding and altering (See exhibit 37.34, 37.38, 37.39, 37.40) the original Gulesserian protocol without Gulesserian being able to be acknowledged of his inventorship (See Exhibit 37.34, 37.38, 37.39, 37.40, 37.12). This action falsely presented the ongoing work not as original independent serendipitous accidental discovery made by Mr. Gulesserian but with an obvious departmental/consortium led intent to deceive the university and the federal government at large (See exhibit 37.8 original fraud intent, followed by 37.12, 37.9, 37.35, 37.39, 37.34, 37.39 , 37.18), which are all a total misrepresentation of material facts of the discovery’s origin (See exhibit 37.22) not the false pretense presented by Bennett Novitch and the consortium group/ Neurobiology department (See exhibit 37.40).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>The Novitch lab had full knowledge that the protocol being replicated was originated by “accident” by Gulesserian a fully “serendipitous” finding by Mr. Gulesserian (See exhibit 37.35) , and that any such work should have involved Gulesserian’s express and unambiguous consent or proper disclosure through regulated and lawful institutional channels before exposing the trade secret (See exhibit 37.40) or exposing such potential and lucrative property to foreign agents (See exhibit 37.24, and 37.27). The respondent(s) decision to proceed without informing UCLA’s TDG that they will hide the true “accident” “serendipitous finding narrative, and instead peddle a false/fake not “Accident” narrative shows deliberate disregard for the truth and knowledge of Falsity to the US government (See Bayh-Dole Act, UCLA policy 993, See NIH reporting guidelines, See Federal reporting guidelines under ORI and Research misconduct rules and laws).</p>
Element 3 – Intent to Deceive	<p>The timing—during Mr. Gulesserian’s FMLA leave (See PDEH)—indicates an intent to obscure Gulesserian’s role and position others as contributors or co-inventors (See Exhibit 37.34, 37.38) so the truth</p>

Fraud Element	Explanation
	<p>remains hidden and not exposable by Gulesserian who took the position that the true serendipitous accidental discovery must be reported as such truthfully. This calculated move to sideline the true inventor in hopes of silencing the truth with a lie supports an inference of deceptive intent (intent to deceive) violating UCLA policy 993 (See policy 993) among many other things.</p>
Element 4 – Justifiable Reliance	<p>Federal FMLA protections, university policies, and NIH funding guidelines all assume inventors will not be undermined while on protected leave (See policy 993, See Federal FMLA regulations, See NIH, See USPTO). These institutions rely on researchers and supervisors to first tell the truth and second to respect legal boundaries, which were violated in this case (Justifiable reliance) (See Bayh-Dole Act, UCLA policy 993, See NIH reporting guidelines, See Federal reporting guidelines under ORI and Research misconduct rules and laws).</p>
Element 5 – Damages	<p>This action based on a fake not accident discovery, not serendipitous finding/invention directly damages the federal government funding, UCLA, State of California, Taxpayer money, along with Mr. Gulesserian by attempting to erase or dilute USA’s/UCLA’s patentable interest in the “serendipitous” (see exhibit 37.30) “accident” (See exhibit 37.8) invention ownership interest, and Gulesserian’s rights, title, and patentable “serendipitous” “accident” interest and ownership of the invention potentially impacting IP rights, authorship, and career progression among other things (See Reagents policy 5105, UCLA policy 993; see exhibit 37.8 Accident, see exhibit 37.30 Serendipitous; see NIH reporting guidelines, among other things). It also exposes UCLA to legal risk for violating FMLA protections and research integrity obligations (See Bayh-Dole).</p>
Element 6 – Causation	<p>The attempt to remake the discovery (See exhibit 37.34 and 37.38, 37.18, 37.40) during Gulesserian’s FMLA leave contributed directly to the loss of control over the invention, escalation of the dispute, and potential legal liability for the university. It is a causal factor in both reputational and financial harm to all affected parties (See UCLA policy 993; See NIH reporting guidelines; See TDG; See FBI trade secrets and economic espionage + Bayh-Dole) because other foreign countries benefited (See exhibit 37.27) from the Gulesserian made accidental novel serendipitous discovery (See US government owned trade secret theft exhibit in Chinese writing and patent filing in exhibit 37.27).</p>

Exhibit 37.35 (1/30/2024 Notice): Fraud Elements – Formal Lab Notification of Legal and Ethical Obligations

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>Prior to the January 30, 2024 formal notice, various lab members acted in ways that feigned and put up a misrepresenting implied ignorance fake narrative of Gulesserian’s inventorship or of the legal obligations to report the discovery. This INSTANT NOTICE corrects that misrepresentation by documenting explicit acknowledgment of Gulesserian’s IP rights (See Exhibit 37.35). Any continued denial of those rights after this date constitutes willful misrepresentation (See Exhibit 37.30, 37.34, 37.35, 37.40, 37.39, 37.12).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>Once the entire lab (see exhibit 37.35)—specifically Jessie Buth, Bennett Novitch, Cendi Ling, and Natella Baliaouri and all Novitch lab members—were officially informed and placed on EXPRESS WRITTEN NOTICE along with the institution through TDG (See exhibit 37.22) Novitch and the group continued attempts to exclude or suppress Gulesserian’s invention and discovery show direct knowledge of the truth and an active choice to disregard it or falsify it (See exhibit 37.8, 37.34, 37.38, 37.39, 37.40). Simply stated, Novitch, Neurobiology department, consortium, TDG and the university all had known reporting duties to the federal government to the extent any research was funded by the federal government (See exhibit 37.30; and all complaints).</p>
Element 3 – Intent to Deceive	<p>Any actions taken after the notice—such as forwarding the protocol to outside labs, failing to disclose to TDG, or engaging in improper authorship claims—were now carried out with documented knowledge (Reminder all members were put on notice). This elevates the conduct from negligence to intentional deception and an intent to willfully/recklessly deceive all parties involved.</p>
Element 4 – Justifiable Reliance	<p>The University, NIH, and Gulesserian himself reasonably justifiably relied on the requirement that, once formally notified, the lab would act in compliance with rules, laws, and policy (e.g., UCLA policy 993, Bayh-Dole Act, Regents Policy 5105 among others). That reliance was breached through continued and ongoing new acts of misconduct and continued falsification of the true story of the discovery (See exhibit 37.8).</p>
Element 5 – Damages	<p>This documented notice (Exhibit 37.35) removes any plausible deniability for lab members. Therefore, subsequent misappropriation attempts (See exhibit 37.18, 37.34, 37.12, 37.27, 37.38, 37.39, 37.40), misreporting and falsifying the entire scientific community on the accidental discovery being a non-accidental intended scientific work(Exhibit 37.40), and concealment (See exhibit 37.38, 37.35,</p>

Fraud Element	Explanation
Element 6 – Causation	<p>37.12, and 37.39) directly resulted and continued with ongoing acts now with wage and hour violation retaliation (See new protected disclosure complaint filed May 23, 2025 by Gulesserian) in greater legal exposure for the US government, the University and increased damages to all parties involved including but not limited to Mr. Gulesserian—loss of trade secret, loss of IP, loss of authorship, exclusion, violations to UC Regents policy 5105 , violation of signed contracts along with breach of federal reporting requirements among other stakeholders among others (See exhibit 37.27 See exhibit 37.26, 37.30, 37.36, 37.40).</p>
	<p>The January 30, 2024, (See exhibit 37.35) email serves as a clear causal marker (See exhibit 37.35): any fraudulent actions taken after this date directly resulted from willful disregard for clearly communicated legal obligations (See exhibit 37.35). Continued suppression or known misappropriation of the accidental serendipitous Gulesserian discovery (See exhibit 37.40, 37.36, 37.38, 37.34, 37.39, 37.18, 37.30) after this point shows unambiguous causation of harm to Gulesserian, the University, and the U.S. government (See exhibit 37.27, and see 37.24 how UCLA made inventions are being shared and translated without protecting intellectual property from international partners outside the USA (See exhibit 37.24)) which is a financial loss of investment to the USA and its general public.</p>

Exhibit 37.36: Fraud Elements – Prioritizing Grants Over Intellectual Property Protection

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>By focusing on grant applications as a consortium group (See exhibit 37.26 and Exhibit 37.36) while withholding proper disclosure of the invention, Dr. Novitch and associated parties created a false impression that there was no patentable discovery requiring formal protection (See exhibit 37.40). By disguising the accidental serendipitous Gulesserian ACOP discovery with the fake planned out deceptive mesh up story of previous lab protocols to cover the truth aligns with Novitch’s original intent of fraud to change the true “accidental” narrative into a non-accidental falsely crafted suitable narrative (See exhibit 37.8, See exhibit 37.38, See exhibit 37.40, See exhibit 37.30). This misled, and still misleads stakeholders into believing protocols were compliant with institutional and federal obligations where lucrative funding was likely secured based on fake narratives(See Bhaduri grant among others). Also keep in mind Novitch did not want to protect the IP but rather obtain federal grants (See exhibit 37.26, 37.36, 37.30 and the Bhaduri and the Plath grants obtained recently at UCLA without even telling the true “accident” and “serendipitous” Gulesserian finding narrative.</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>The parties (Mostly all of them were involved in management roles, or were graduate students that had knowledge (See exhibit 37.35) involved were aware that the invention should have been disclosed to UCLA’s Technology Development Group (TDG) under federal and university rules, including the Bayh-Dole Act and UCLA policy 993 (See exhibit 37.35). The decision to pursue funding without transparent honest and true story disclosure shows clear knowledge of reporting obligations and a deliberate choice to ignore them (See exhibit 37.26, 37.36, 37.35, 37.30, 37.40, 37.39).</p>
Element 3 – Intent to Deceive	<p>The shift to grant pursuit (See exhibit 37.26 & 37.36) without formal IP protection indicates an intent to monetize the discovery through channels that bypass inventor rights and proper ownership tracking (See Bhaduri grant). It reflects a calculated decision to benefit financially for personal and foreign country gains while evading institutional processes and federal/state laws designed to safeguard those very rights (See exhibit 37.24 and 37.27 see also NIH reporting).</p>
Element 4 – Justifiable Reliance	<p>Federal agencies like the NIH and the University of California system rely on researchers to disclose inventions for public protection,</p>

Fraud Element	Explanation
Element 5 – Damages	<p data-bbox="526 247 1412 422">commercial benefit, and compliance with federal funding laws (See UCLA policy 993). The deviation from these expectations broke that reliance and potentially exposed the government to loss of property rights (See exhibit 37.27) to foreign agents like china benefiting from US funded scientific research.</p> <p data-bbox="526 436 1412 688">Granting agencies may have been misled into funding research based on a discovery that had already occurred and should have been patented, rather than treated as new or unprotected work (UCLA policy 993, Bayh-Dole Act, NIH reporting guidelines). This causes loss of commercialization rights for UCLA, for the U.S. government, and for Mr. Gulesserian as China seems to be the one of benefit (See exhibit 37.27) of commercialization rights.</p>
Element 6 – Causation	<p data-bbox="526 703 1412 1281">The conscious decision to prioritize grants (37.26, 37.36, 37.30, 37.12) over reporting the true “accident” (See exhibit 37.8) and “serendipitous (See exhibit 37.30) discovery directly and truthfully without creating a totally false not accident, not serendipitous narrative by Bennett Novitch (See exhibit 37.8, 37.30 without limits) and furthered by the consortium (See exhibit 37.40, 37.12) and neurobiology department (See exhibit 37.30, 37.44; See new protected disclosure complaint for wage and hours and continuation of a hostile work environment) collectively without limits led to the loss of timely IP protections and reporting, diverted control of the serendipitous accidental Gulesserian discovered protocol, and violated policies and state and federal laws meant to protect both public investment and inventor contributions (See UCLA policy 993, Bayh-dole act, NIH reporting guidelines among others). This behavior directly resulted in financial and reputational harm to multiple parties including but not limited to the federal government.</p>

Exhibit 37.38: Fraud Elements – Fabrication and Concealment of Inventor’s Protocol

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>Cendi Ling, Bennett Novitch, Natella Baliaouri, and others falsely presented with use of a disguised (See exhibit 37.38) and intentional misrepresentation of material facts with a version of Mr. Gulesserian’s Serendipitous protocol as if it were developed, not by accident, but by conscious design by their group thus peddling that false and fake Novitch led “more suitable narrative” (See exhibit 37.8), concealing the material fact that the discovery and invention stems from an accidental mistake made in the lab by Gulesserian, who is in fact the true author and inventor as fabricated protocol is adapted from Gulesserian’s protocol without his knowledge (See exhibit 37.38); essentially, —Mr. Gulesserian—had neither shared the manuscript that was presented confidentially to TDG UCLA by Gulesserian, but rather Novitch obtained it from UCLA TDG and improperly disseminated the serendipitous trade secret protocol (See exhibit 37.23). Displaying Gulesserian’s name on a fake narrative document without consent of original inventor, creator, discoverer, Mr. Gulesserian, essentially constitutes a material misrepresentation of facts intended to deceive those not well accustomed to Brain organoid work (See exhibit 37.38, 37.40 37.2, and 37.22). Because the mesh up of the older protocols with Gulesserian’s accidental serendipitous discovery is being presented under false pretenses in a fraudulent manner. Furthermore, the invention or parts of it have been misappropriated to china (See exhibit 37.27)</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>The evidence supports the notion that all named individuals in this notice and instant complaint essentially had knowledge that Mr. Gulesserian never provided the protocol to Cendi Ling or associates who fabricated (See exhibit 37.38 along with 37.18 & 37.34, 37.38, 37.39, 37.40). The Gulesserian serendipitous accidental discovery and protocol had only been submitted to UCLA’s Technology Development Group (TDG) through ACOP manuscript (See exhibit 37.22), which means its presence in their hands was unauthorized (37.39, 37.40). The respondent(s) actions indicate deliberate knowledge of falsity surrounding the protocols origin and the fraudulent willful concealment or outright lies to the university as to the serendipitous finding by Gulesserian (See exhibit 37.22).</p>

Fraud Element	Explanation
Element 3 – Intent to Deceive	<p>The act of altering and redistributing the protocol under false authorship (See exhibit 37.38)—while knowing it was not theirs (See exhibit 37.16, 37.30, 37.22, See PDEH evidence handbook)—shows clear intent to deceive stakeholders, including TDG, other labs, and funding agencies (See UCLA policy 993), and to falsely position themselves as contributors or co-inventors.</p>
Element 4 – Justifiable Reliance	<p>UCLA and federal stakeholders rely on internal actors to handle intellectual property with integrity, assuming disclosures are truthful, and authorship is legitimate (See UCLA policy 993). Fabricating documentation bearing Mr. Gulesserian’s name, while concealing its source, breaches this reliance and puts institutional trust in jeopardy (See UCLA policy 993). It is likely that now federal oversight and investigation is needed to curb the bad actors from reporting their ongoing acts of their fraudulent activity as established by the written documentary evidence.</p>
Element 5 – Damages	<p>These actions directly compromise Mr. Gulesserian’s intellectual property rights, damage his scholarly reputation, and may result in the dilution or invalidation of future patent claims (See Reagents policy 5105). UCLA also suffers institutional damage from exposure to academic fraud and policy violations (See policy 993) from the federal government without limitations the damages to the United States of America, the US taxpayers ,UCLA, and Mr. Gulesserian.</p>
Element 6 – Causation	<p>The concealment, falsification, and improper possession of the serendipitous accidental Gulesserian discovered protocol (See exhibit 37.38, 37.34, 37.39, 37.40 37.2 v 37.22 ACOP Gulesserian manuscript)—especially one already submitted to TDG (See exhibit 37.22)—establishes a clear causal link to the deprivation of Mr. Gulesserian’s rights and the systemic attempt to bypass proper IP procedures (See UCLA policy 993. These acts contribute directly to harm done to the inventor, the university, and federal interests without limits (See UCLA policy 993). By allowing federal funds to support and finance academic aspirations of scientist the federal government expects all researchers and institutions like UCLA to stay in compliance of reporting duties in order to avoid unnecessary trade secret litigation among other things for foreign espionage and theft among other things.</p>

Exhibit 37.39: Fraud Elements – Misattribution of Creation and Failure to Report Discovery

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>More evidence indicates the obvious plausibility that Natella Baliaouri (See exhibit 37.18), with Bennett Novitch and Maria Caballero copied on the email chain, attempted to hide the “serendipitous” finding narrative and this falsely attribute the creation and inventorship of Mr. Gulesserian's discovery to himself or others (See exhibit 37.34, 37.40, 37.39). The accidental nature of the discovery, which should have been immediately reported as a novel invention to the federal government (See strict NIH reporting duties, See UCLA policy 993), was concealed or misrepresented by Novitch and lab members (See exhibit 37.39, 37.40, 37.38, 37.34.) keep in mind also once again as the Feeder-Free protocol in the Novitch lab was non-existent essentially prior to Gulesserian’s accidental serendipitous discovery, or rather it did not work as a viable alternative (See TGFB Novitch paper; where Novitch and his labs attempts to succeed failed or were not efficient for the Feeder free methods). This misrepresentation of material (exhibit 37.39) fact is a complete misstatement regarding the true inventor creator of the Gulesserian serendipitous accidental novel protocol (See exhibit 37.22, See exhibit 37.30, See exhibit 37.8 couple with new Baliaouri’s new admissions) (See exhibit 37.39).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>All parties involved—Baliaouri, Novitch, and Caballero—knew/ had knowledge (See exhibit 37.35) that the discovery was made by Mr. Gulesserian accidentally, as it had been established through prior communications and reports (See exhibit 37.16, See exhibit 37.30 delay patent, See exhibit 37.39 couple with new Baliaouri admission). Their admission evidence emails then coupled with their actions to misattribute the discovery by changing the narrative (See exhibit 37.18 suggest deliberate intent to deceive (37.40) the true inventor and to cover up improper reporting of the invention (See Bayh-Dole Act, and UCLA policy 993).</p>
Element 3 – Intent to Deceive	<p>By attempting to falsely identify someone else as the creator of the discovery, the individuals involved intentionally sought to mislead university officials and stakeholders (clear intent to deceive (exhibit 37.40 + all complaints). Their actions likely had the intent to control or appropriate the invention (See exhibit 37.18) for personal or alternate institutional gain (See exhibit 37.26 and 37.36) while depriving the rightful inventor of recognition and protection under contractual obligations among other things (See exhibit 37.8).</p>

Fraud Element	Explanation
Element 4 – Justifiable Reliance	<p>The U.S. government, through institutions like UCLA and federal funding agencies, has justifiable reliance and relies on the truthfulness of reported inventions and accidental discoveries to ensure appropriate protection and patent filings under the Bayh-Dole Act and UCLA policy 993 among others including but not limited to NIH reporting guidelines (See NIH). The failure to report the accidental discovery in a timely manner (within 30-60 days to the federal government through the iEdison platform) undermines that trust and puts stakeholders, including the U.S Government, UCLA, and Mr. Gulesserian, all at risk (See exhibit 37.24 and 37.27) to foreign agents/countries benefiting rather than the United States Government and public for a USA made Gulesserian serendipitous novel scientific discovery (See exhibit 37.22).</p>
Element 5 – Damages	<p>This misattribution and the delayed reporting of the discovery to the government resulted in a significant loss of intellectual property rights for Mr. Gulesserian among other damages (See all complaints without limitations), while potentially facilitating the appropriation of Gulesserian’s invention by others (See exhibit 37.24, exhibit 37.27, exhibit 37.40 and exhibit 37.22). The failure to follow proper reporting protocols also undermines institutional integrity and risks financial losses for UCLA, the NIH, and the U.S. government along with Gulesserian and all other stakeholders who fund these types of projects with United States taxpayer money (See NIH).</p>
Element 6 – Causation	<p>The deliberate misrepresentation of inventorship (See exhibit 37.12, 37.9, 37.18, 37.30, 37.34, 37.38, 37.39 & 37.40) and the delay in reporting the discovery to the government is a casual link that led to a direct loss of the opportunity for patent protection under U.S. law, as well as the potential diversion of rights to other parties (See exhibit 37.24 and 37.27) USA should benefit from its investments (See exhibit 37.22) not China or any other foreign agent (see exhibit 37.24 & 37.27). This failure to report the invention according to required timelines (within 30-60 days) to the federal government per the strict NIH reporting guidelines directly contributed to the harm caused to Mr. Gulesserian and all stakeholders relying on the timely and honest disclosure of innovations by supervisors Novitch and all other supervisors in the consortium group among other supervisors’ administrators or students collectively. The goal should not be to obtain funds from the government without allowing the government to benefit from its own investments. Funding agencies have put trust and respect into scientist researchers in order to avoid these types of troubles for their rightful property interest among other things (See UCLA policy 993, See NIH, See Bayh-Dole Act, See UCLA TDG, See all UCLA research misconduct policies, see ORI regulations).</p>

Exhibit 37.40: Fraud Elements – Exposure of Intellectual Property Without Protection

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>The exposure of Mr. Gulesserian’s intellectual property (IP) without proper protection is a direct violation of university policy and the protocols designed to secure the IP (See Exhibit 37.40.1). The poster, amount to a feeble attempt to disguise and further the fake narrative created by Novitch (See exhibit 37.8) that in fact the ACOP protocol is not a “Serendipitous” (See exhibit 37.30) finding (See exhibit 37.40) where in the true and accurate narrative it is in fact and accidental (See exhibit 37.8) and serendipitous (See exhibit 37.22, 37.30) innovation and finding (See exhibit 37.8), therefore the poster (see exhibit 37.40) is an express evidence of disguising and misappropriating the novel and patentable Gulesserian invention protocol by disguising it with previous lab member protocols (See exhibit 37.2), this evidence appears clearly in the poster (See exhibit 37.40) which is a specious attempt to defraud the unknowing without properly noticing stakeholders via a failed attempt to piece together various protocols from the lab along with Gulesserian's novel discovery to make a smoke screen disguise (See exhibit 37.40); arguably this misrepresents the true origins and ownership of the “SERENDIPITOUS” discovery (See exhibit 37.30, 37.22, 37.8) which Novitch himself made an evidentiary admission to but later tries to backpaddled in an attempt to dilute the significance of an “accidental” mistake and the rightful inventor creatorship (See exhibit 37.30) by Mr. Gulesserian resulting in a total misrepresentation of facts with requisite intent and knowledge. Furthermore, there is a false narrative (see exhibit 37.8 original plan for fraud) on the poster (see exhibit 37.40 where the fraud is now being driven forward by the consortium and Novitch). Seemingly, these misrepresentations were done in part to obtain government grants from the federal and state governments (See exhibit 37.26, 37.36 ; see Bhaduri grant application, See Plath grant application, See Butler grant applications see China patent 37.27) without giving the United States Government adequate dutiful notice to protect its rightful invention rights under USPTO requisite (See Bayh-Dole notice, See UCLA policy 993).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>Evidence of knowledge of falsity; Dr. Novitch (See exhibit 37.8) and the consortium members (See exhibit 37.11 and 37.16), aware of the IP's sensitivity and Gulesserian's rights, acted with knowledge of the falsity of their actions by permitting or encouraging the public exposure of the “serendipitous” (see exhibit 37.30) invention without requisite Bayh-Dole</p>

Fraud Element	Explanation
Element 3 – Intent to Deceive	<p>notice in securing proper IP protection (See Consortium Exhibit 37.40 False pretenses poster; See Bayh-Dole Act, See UCLA policy 993). The intent was and remains clear: to ensure that the accidental (See exhibit 37.8) and serendipitous (See exhibit 37.30) intellectual property truth is not told thus the trade secret could not be patented thus was not protected and potentially appropriated from both the NIH (by obtaining federal grants and not reporting novel discoveries in a timely manner per requisite requirements) and then likely exposing parts of the novel discovery to foreign governments for personal gains (See exhibit 37.24 and 37.27 and 37.28) all with a smoke screen disguising attempt to distort the original true narrative of the accidental discovery (see exhibit 37.8) which was Novitch's original plan to defraud the government and obtain government grants and further knowingly furthering the intentional sharing of a federally owned trade secret breaching the duty to principal NIH and the Federal government (37.26, 37.36, 37.40, 37.12) instead of protecting the intellectual property through the proper federal channels (See UCLA policy 993, See NIH reporting duties, See Trade secrets laws, See ORI regulations).</p>
	<p>The creation and presentation of the poster(See exhibit 37.40; which was disguised to hide the accidental (See exhibit 37.8) and serendipitous (See exhibit 37.30) novel (See exhibit 37.22) Gulesserian invention by using a tactic piecing together elements of the Novitch lab's former protocols (see exhibit 37.2 , 37.40), with the novel serendipitous Gulesserian protocol/ discovery (see exhibit 37.22), were intentionally designed to obscure the true ownership and origins of the invention (See exhibit 37.8) with a narrative change by Novitch. This suggests an effort to deceive other stakeholders, intentionally including the U.S. government and funding agencies, regarding the true nature of the accidental finding and thus silence the truth to prioritize other individuals or groups who could benefit financially (See exhibit 37.26 and 37.36, 37) including those from foreign countries like China (see exhibit 37.27(or international partners see Gupta exhibit 37.24 (See exhibit 37.24; Gupta).</p>
Element 4 – Justifiable Reliance	<p>UCLA, NIH, and the U.S. government rely on the proper handling and disclosure of intellectual property for protection and commercialization under policies such as the Bayh-Dole Act (see Bayh-Dole act, see UCLA policy 993). The actions of Dr. Novitch and the consortium and all respondents criminally violate these protocols in conjunction with federal and state laws (See exhibit 37.40, 37.26, 37.12, 37.36) thus by intentionally exposing trade secrets not protected, which the USA intellectual property, leading to the risk of U.S. ownership being forfeited and the discovery being improperly shared or exploited without the appropriate protections including foreign entities like china (See exhibit 37.24 and exhibit 37.27)</p>

Fraud Element

Explanation

getting the patent benefit of the American USA government/publics investments.

Element 5 – Damages

Damages: The public exposure of the discovery (See exhibit 37.40) without protection leads to a complete loss of Mr. Gulesserian's rights under reagents policy 5105. The failure to properly secure Gulesserian's serendipitous novel accidental invention deprives Gulesserian of potential patent rights, commercialization opportunities, and any possible financial or academic recognition that should have rightfully gone to Gulesserian (See signed contracts and benefits). Additionally, it potentially damages the U.S. government and UCLA, which lose the chance to benefit from this serendipitous innovations patentability to bad acting actors (See exhibit 37.27).

The deliberate and wrongful exposure of the intellectual property without proper reporting or protection forecloses all of Mr. Gulesserian's opportunities (See UCLA policy 993 and Reagents policy 5105; see also objectives set forth by provost Brown). The presentation of the poster and the concealment of the true origins of the discovery also disrupts the proper patent process, preventing the rightful inventor from securing his intellectual property rights and allowing the U.S. government and UCLA to miss out on potential benefits (See exhibit 37.27). All events are casually linked. This must at minimum be investigated for the deliberate and intentional reckless coordinated **scheme** in attempts to falsify information and at minimum to defraud the institution (UCLA), the U.S government and the rightful creator inventor of the novel serendipitous accidental discovery made by Gulesserian (See exhibit 37.22).

Element 6 – Causation

See also Provost Browns Objectives Quoted Below:

“ • Applied research and/or research translation through public-private partnerships • Research and/or development funding or support from industry, private ventures, or other for-profit sources • Technology transfer-related grants and contacts • Contributions to team science, such as externally-sponsored centers and institutes, and other collaborative systems for scholarly discovery • New approaches and innovative methods for teaching and learning • Creation of intellectual property and disclosures submitted • Dissemination of knowledge through nontraditional means • Patents, copyrights, or licenses of inventions, processes, procedures, software, or creative works – applied for, pending, and awarded • License or royalty income received • Clinical advances 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

Fraud Element

Explanation

and perspective in innovation transfer and entrepreneurship through sponsorship and visibility of translational research by persons underrepresented in these areas • Providing students with translational research and entrepreneurial experiences that provide a connection to real-world problems”

<https://regents.universityofcalifornia.edu/regmeet/june22/slattach3.pdf>

See also UC Regents Policy 5105

“Starting in Academic Year 2023-24, a Regents Innovation Awards program to recognize and celebrate exceptionalism 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, civically 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 stokes the passion of the UC community to vigorously 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.

Fraud Element**Explanation**

- 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 democratize 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."

<https://regents.universityofcalifornia.edu/governance/policies/5105.html>

Exhibit 37.41: Fraud Elements – Hostile Behavior and Violation of University Protocols

It is submitted and alleged without limitations and among other things as follows:

Fraud Element**Explanation****Element 1 –
Misrepresentation of a
Material Fact**

Dr. Novitch's behavior, including his attempt to physically intimidate Mr. Gulesserian by clenching his fist and challenging him to "bring it on," (See exhibit 37.41) reflects a clear misrepresentation of the academic and professional conduct required by UCLA and the broader research community (See UCLA policy 993). Such actions create an atmosphere where the rightful reporting of intellectual property is undermined, with an implied threat to dissuade Gulesserian from claiming his rights along with back pay wage and hour violations or furthering his whistleblowing activities (See Whistleblower Policy).

Fraud Element	Explanation
Element 2 – Knowledge of Falsity (Scienter)	<p>Dr. Novitch’s actions, including his hostile behavior, demonstrate a conscious awareness and knowledge that his conduct was in direct violation of university procedures, research ethics, and laws that govern intellectual property (UCLA policy 993). Novitch’s refusal to comply with university rules, particularly regarding the reporting of potential inventions, and refusal to implement UCLA approved reasonable healthcare accommodations suggests that Novitch and the consortium understood the falsity of Novitch’s actions and attempted to intimidate Gulesserian to avoid following proper procedures or to break the law (See all complaints).</p>
Element 3 – Intent to Deceive	<p>Evidence of the confrontation and intimidation tactics such as tolling wage and hour punishment actions among others used by Dr. Novitch, Mark Lucas, Samantha Butler and the consortium group, paired with ongoing refusal to follow university policies, reflect an intent to deceive and intent to prevent Mr. Gulesserian from pursuing rightful ownership of his invention take into account refusing and precluding reasonable healthcare accommodations or to pay wage and hour violations intentionally. The respondent(s) actions appear to be part of a larger, intentional effort to coerce Gulesserian into waiving his rights, thereby concealing the true origins of the discovery and its proper ownership and likely misappropriation with the benefit to the foreign countries (See exhibit 37.24 and 37.27).</p>
Element 4 – Justifiable Reliance	<p>The University, the U.S. government, and NIH rely on faculty members to adhere to institutional protocols for reporting and protecting intellectual property (See Bayh Dole & NIH guidelines and UCLA policy 993). Dr. Novitch's failure to align with these obligations undermines that reliance and violates the trust these entities place in academic institutions to uphold ethical and legal standards. By attempting to intimidate Gulesserian, Novitch violated the expectation that intellectual property will be handled transparently and in accordance with the law presuming justifiable reliance would be honored to the fullest extent (See UCLA policy 993). Just as Gulesserian relied on UCLA to Safeguard the novel invention disclosed or the monies that were owed to Gulesserian per work contracts or wages earned not paid.</p>
Element 5 – Damages	<p>The hostile environment and attempts to force Gulesserian to waive his rights under pressure, precluding reasonable healthcare accommodations, precluding earned wage and hour and paycheck processing, precluding rights to the invention among many other matters resulted in significant personal and ongoing professional harm and irreparable damages. Mr. Gulesserian was subjected to intimidation tactics that could have discouraged Gulesserian from</p>

Fraud Element	Explanation
Element 6 – Causation	<p>pursuing his rights. This behavior not only harmed Gulesserian's ability to protect his intellectual property but also jeopardized potential benefits to UCLA, the U.S. government, and other stakeholders relying on proper patenting and commercialization processes. The result is institutional damage (See exhibit 37.24 and 37.27), damage to the U.S Government due theft of trade secrets from the USA and wrongfully claimed by foreign agents like the republic of China (See Exhibit 37.27).</p>
	<p>The attempt to force Gulesserian to waive his rights, combined with the hostile work environment, created a direct path to the destruction of his opportunity to claim ownership of the intellectual property all coupled together as a causal link (See exhibit wiping out servers). The university's failure to intervene and address these behaviors exacerbated the situation, resulting in potential harm to UCLA, NIH, and the U.S. government by precluding the patenting of a potentially valuable discovery and misrepresenting the circumstances surrounding its creation (see Bayh-Dole act, NIH reporting guidelines and UCLA policy 993).</p>

Exhibit 37.42-43: Fraud Elements – Harassment and Denial of Creator Rights

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>Documentary evidence of Dr. Novitch and the Consortium PI's plus the administrator actions, including bringing Butler lab manager Keith Phan into the confrontation, represent a clear misrepresentation of the facts surrounding the rightful inventor of Mr. Gulesserian's discovery because Novitch would try to discredit Gulesserian for his serendipitous accidental novel discovery to impose Novitch's original intent which is and remains hide the truth and change the narrative to a more suitable one(see exhibit 37.8). By attempting to deny Gulesserian any inventor or creator rights in front of others or attempts to pass on Gulesserian's credit to other individuals among other unlawful plays, Dr. Novitch once again was distorting the true narrative as originally planned (See exhibit 37.8) about the origins of the serendipitous novel Gulesserian discovery, while Novitch continued his ongoing pattern of threats, retaliation, discrimination, harassment and intimidation along with misrepresentation of facts (See all exhibits and complaints + all reporting strict guidelines to the federal government and UCLA).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>Dr. Novitch's conduct, including harassing Gulesserian and failing to acknowledge his hostile behavior (See PDEH & instant complaints) demonstrates that Novitch knew his actions were not only in violation of university policies but were intentionally aimed at suppressing Gulesserian's rightful claims to the invention (See exhibit 37.8 & 37.30). His ongoing harassment and denial of Gulesserian's rights reflect a knowledge of the falsity of his statements and a willful disregard of the truth among other things.</p>
Element 3 – Intent to Deceive	<p>Dr. Novitch's actions, which included bringing additional individuals into the harassment (See complaints filed with DPO) and denying Gulesserian's inventor rights by trying to make a fake narrative state that Gulesserian's Serendipitous and accidental novel discovery was essentially someone else's prior work or otherwise schemed (See exhibit 37.30, exhibit 37.34, 37.38, 37.18, 37.39 ,37.40), suggest an intent to deceive (Also, not commensurate for a university role model!) (See exhibit 37.8) Gulesserian and all parties including the U.S government about the rightful discovery of the serendipitous novel accidental Gulesserian invention which would now constitute federal harm (Harm to USA benefit to China see exhibit 37.27). The pattern of intimidation and misrepresentation indicates that Novitch and consortium members (see exhibit 37.40) sought to suppress the</p>

Fraud Element	Explanation
Element 4 – Justifiable Reliance	<p>truth and further prevent the legitimate reporting of the intellectual property with a clear intent to deceive UCLA, California and the U.S Government (See UCLA policy 993 and Bayh-dole act for reporting).</p> <p>The U.S. government, NIH, and UCLA all rely on faculty members and researchers to adhere to institutional protocols for reporting discoveries, protecting intellectual property, and upholding the law (See UCLA policy 993). By engaging in harassment and misrepresentation, Dr. Novitch not only undermined this trust but also obstructed the university's responsibility to ensure proper disclosure and protection of intellectual property, thereby violating these institutions' expectations of honesty and integrity and justifiable reliance among other things (see UCLA policy 993).</p>
Element 5 – Damages	<p>The continued discrimination, retaliation, harassment and wage and hour violations (See Shelly Frohrip exhibit 10 and 11), combined with the denial of Gulesserian's inventor rights (See exhibit 8 Naiberg), caused and continues to cause significant emotional and professional harm to Gulesserian. Gulesserian's attempts/opportunity to protect and commercialize United States made/discovered intellectual property was directly hindered, and the actions of Dr. Novitch threatened to delay or thwart any legal protections for the discovery, potentially causing long-term damage(s) to Gulesserian's career and to the stakeholders reliant on his invention's potential (See Regents policy 5105) along with damages to the United States Government (See Bayh-Dole-Act, See theft of trade secrets).</p>
Element 6 – Causation	<p>The direct confrontation and harassment by Dr. Novitch, particularly after his earlier hostile behavior (See communication with Frohrip on 2/10/2025), exacerbated the already toxic environment for Gulesserian is a direct causal link. By attempting to suppress Gulesserian's inventor rights and denying the truth of the situation, Novitch's actions clearly contributed to maliciously, knowingly, and with full clear intent to Gulesserian's damages without limitations his inability to secure proper patent protection, recognition, and to report Gulesserian's novel serendipitous accidental USA made discovery in accordance with university and federal laws, which in turn caused broader harm to the U.S. government, UCLA, and other stakeholders (See UCLA policy 993 & Regents policy 5105, See ORI regulations, SEE NIH reporting regulations among others).</p>

Exhibit 37.44: Fraud Elements – Pressure and Bias Involvement

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 2 – Knowledge of Falsity (Scienter)	<p>Evidence of this email (Exhibit 37.44) conclusively establishes the element of knowledge of the investigation and the investigator investigating the matter; specifically, the email says: “ 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.” (CAO Mark Lucas) therefore conclusively establishing the requisite knowledge requirement that Lucas knew (See exhibit 37.44, also see exhibit 37.30 April 15 2024 where Lucas became a party and knew of the serendipitous accidental Gulesserian discovery (See exhibit 37.30)) the details of the investigation thus providing the requisite animus needed for the claims raised by Gulesserian as not just Bennett Novitch but Mark Lucas as well as all other co-conspirators of this fraudulent scheme including but not limited to; Novitch lab members, Butler lab members, UCLA consortium group members, UCLA administrators among others without limits.</p> <p>CAO Mark Lucas’s subsequent actions demonstrate his awareness of the situation and possible biases regarding the matter at hand (See Exhibit 37.44). By placing in quotes the significance of the word “discovery,” (See Exhibit 37.44) Mark Lucas omits the material fact that its an “Accidental Discovery” because Lucas was CC’d on the April 15, 2024 email titled Delays (See Exhibit 37.30) where Novitch himself personally admits Gulesserian’s “Serendipitous” discovery (See Exhibit 37.30), thus knowingly sought to undermine the potential for proper patent protection and rightful attribution, likely understanding the larger implications if the real narrative of an “serendipitous/accidental discovery/ invention by Gulesserian could have on both Gulesserian’s career and the research involved in regard to specific Reagents policy 5105 and Provost Browns hiring and promoting objectives criteria (See Provost Brown’s objectives, See UC Reagents policy 5105, See UCLA policy 993, without limits), without limitations. Furthering a fake narrative which constitutes a misrepresentation of material fact created by Bennett Novitch (See exhibit 37.8) and furthered by Mark Lucas and members of the consortium (See exhibit 37.40 poster with consortium group and 37.44) more fully identified in the instance submissions and</p>
Element 1 – Misrepresentation of a Material Fact	

Fraud Element	Explanation
Element 4 – Justifiable Reliance Element 3 – Intent to Deceive	<p>PDEH evidence handbook without limitations. Bennet Novitch’s Misrepresentation of material facts quoted “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.” (Exhibit 37.8 to which Mark Lucas is acting in furtherance of the fraud by Bennett Novitch by omitting the duty to report or be truthful about the situation (See exhibit 37.8).</p>
	<p>UCLA, the U.S. government, and the academic community rely on individuals like Bennett Novitch and Mark Lucas to tell the true and accurate narrative for how and in what manner the novel invention was discovered, especially when dealing with significant discoveries like the one made by Mr. Gulesserian. By altering of material facts Novitch & his co-conspirators (Lucas + UCLA consortium members + Neurobiology department) behavior undermined the expectations and reliance these institutions place on their researchers and administrators to follow the proper channels for reporting discoveries and protecting intellectual property (See NIH, See UCLA TDG, See USPTO, See UCLA policy 993, See Bayh-Dole-Act, among others). Therefore, establishing a known intent to deceive all parties involved from the start (See exhibit 37.35). In fact that both Bennett Novitch, and Mark Lucas are in Role Model positions further exacerbates the harm, as the pattern of human behavior is not commencement with University policies on honesty, and truthfulness (See APM, See APM015, See UCLA policy 993, among others without limits).</p>
Element 5 – Damages	<p>USA should benefit from their investments to the extent allowed and not benefit other countries like China when US funds are being used (See exhibit 37.27) or any other foreign agent (See exhibit 37.24).</p>
Element 6 – Causation	<p>Mr. Lucas’s admission evidence (See exhibit 37.44) coupled with Bennett Novitch’s admission emails (See exhibit 37.8) directly establish the causal intent knowledge motive and human pattern of behavior to present a false narrative (See exhibit 37.8) as to the discovery invention creation of the trade secret/ intellectual property/ patentable interest of all interest holders, past present or future being forfeited by Bennett Novitch, the UCLA consortium (See exhibit 37.40), and numerous members of the Neurobiology department at UCLA among others, as the original accidental narrative was not suitable for Bennett Novitch’s likening from day one where the intent to commit fraud was blueprinted out during the October 2nd 2023 email titled “SB” (See exhibit 37.8) . Therefore, creating false narratives (see exhibit 37.8), attempting to deceive (See exhibit 37.40) by disguising the audience modifies the economic aspect of patentability of the trade secret thus effecting</p>

Fraud Element**Explanation**

economic value of the trade secret ultimately causing harm to all stakeholders involved (See exhibit 37.27, 37.40 and all exhibits attached in all complaints to the institution collectively).

Exhibit 37.45: Fraud Elements – Wiping of Servers

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>The act of wiping servers constitutes an intentional concealment of potentially critical data regarding the discovery and related research (See exhibit 37.45). This omission is material because it hides digital evidence that could clarify the timeline, authorship, and originality of the serendipitous discovery attributed to Mr. Gulesserian (See Exhibit 37.45).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>The coordination and approval of the data wipes were conducted by respondent(s) who were aware of the ongoing or potential investigation and of the nature of the discovery at issue. Internal correspondence (See Exhibit 37.45) shows that key personnel, including but not limited to Bennett Novitch and his Graduate students had IT Administrator privileges had knowledge that wiping servers would prevent further scrutiny and can constitute as research misconduct (See UCLA policy 993).</p>
Element 3 – Intent to Deceive	<p>The timing of the server wipes coincided with formal institutional inquiries and patent filing windows. This suggests a deliberate intent to erase evidence relevant to both intellectual property ownership and attribution. It implies a pattern of obstruction and an intent to deceive with knowledge to all the stakeholders, including UCLA, NIH, and the USPTO, Gulesserian and the United States federal government.</p>
Element 4 – Justifiable Reliance	<p>Stakeholders—including university auditors, federal grantors (including but not limited to the NIH), and institutional compliance officers, researchers, and administrators — are entitled to rely on the integrity and availability of digital records. The unauthorized destruction of data (See exhibit 37.45) and the purchasing of external hard drives (See exhibit 37.46) erodes this trust and violates compliance with standard data retention policies (See UCLA Data Retention Policy 5021).</p>
Element 5 – Damages	<p>The erasure of these records was devised to potentially compromise the Universities or any other investigator’s ability to verify Mr.</p>

Fraud Element	Explanation
	Gulesserian's invention or sequence of discovery, thereby weakening any potential claim to intellectual property and damaging future funding or licensing opportunities to UCLA collectively as federal oversight is now required due to the USA made trade secret being exposed to foreign agents for foreign profits on American investments.
Element 6 – Causation	The action of wiping servers directly caused the loss of critical evidence. As outlined in Exhibit 37.45C (IT incident report), this step created a causative break in the chain of evidence, impacting due process and eliminating traceable proof of the discovery's origin, thereby constituting a key act in the fraudulent cover-up.

Exhibit 37.46: Fraud Elements – Purchasing of External Hard Drives

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>The purchase and use of external hard drives for research-related data storage without institutional tracking or logging constitutes a willful misrepresentation of how and where data is being handled. This was done despite the existence of formal policy requiring all research data to be stored on secured university servers (See UCLA IT Policy 303.1 and Research Policy 5105).</p> <p>The timing and pattern of hard drive purchases—aligned with investigatory timelines—demonstrates that those involved were aware of the prohibited nature of the conduct and sought to circumvent internal controls (See exhibit 37.8, 37.12, 37.30, 37.18, 37.34, 37.38, 37.40). Evidence includes logs and times of purchases of these hard</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>drives and the unnecessary need to erase data when 8tb space was available (See Exhibit 37.45 & 37.46), and a related thread referencing moving everything off-grid (See exhibit 37.45) couple this with international partners (See exhibit 37.24) and foreign agents wrongfully benefiting from USA made discoveries (See exhibit 37.27).</p>
Element 3 – Intent to Deceive	<p>The external storage purchases appear calculated to avoid detection and oversight, thereby concealing data that would have revealed the true source and context of the intellectual property at stake (See exhibit 37.46 and PDEH PowerPoint on fraud). This is not a passive oversight but a proactive attempt to sidestep institutional review (See exhibit 37.45).</p>
Element 4 – Justifiable Reliance	<p>University departments and the NIH rely on accurate and transparent data handling (See Bayh-Dole Act, See NIH, See UCLA policy 993,</p>

Fraud Element	Explanation
Element 5 – Damages	<p>See USPTO). These off-record data transfers nullify the chain of custody and make it impossible for institutional compliance offices to verify research integrity if the bad faith actors are able to selectively move data into the servers while wiping out the remaining data to fool the investigators of the honest and true narrative of events (See exhibit 37.45).</p> <p>The bypassing of institutional systems jeopardizes the integrity of research, possibly leading to a loss of funding, a flawed patent process, or export control violations. The concealment may even impact national interest depending on the sensitivity of the IP involved which now requires federal oversight.</p>
Element 6 – Causation	<p>The act of moving research materials to untracked drives created a direct barrier to evidence recovery and truthfulness to the stories origin. The subsequent unavailability of original files has attempted to smoke screen the investigative process, therefore directly contributing to the damages suffered by Gulesserian and institutional stakeholders like the United States Federal government and the general American public.</p>

Exhibit 37.47: Fraud Elements – Causal Links Between Chinese Patent Filings and Misappropriation of Gulesserian’s Discovery

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	<p>The Chinese patent filings mirror the unique scientific characteristics and novel applications of Gulesserian’s serendipitous discovery, yet fail to credit or acknowledge the U.S.-based research origin. The patents were filed during a timeframe when institutional data servers were intentionally wiped, concealing the timeline of discovery and obscuring origin provenance (See Exhibit 37.22, 37.45, and 37.47).</p>
Element 2 – Knowledge of Falsity (Scienter)	<p>The alignment of patent activity abroad with the intentional deletion of research data and simultaneous acquisition of untracked external hard drives (See Exhibits 37.45, 37.46) indicates knowledge and intent. The parties involved were aware that this data belonged to UCLA/NIH-funded efforts, yet failed to disclose or protect its origin, violating federal and institutional policies (See Exhibit 37.47).</p>
Element 3 – Intent to Deceive	<p>The covert offshoring of data and subsequent foreign patent filings were strategic, designed to mislead U.S. stakeholders and appropriate the intellectual property without detection. These acts reflect deliberate concealment and misrepresentation of rightful ownership and authorship (See Exhibit 37.24 and 37.27).</p>

Fraud Element	Explanation
Element 4 – Justifiable Reliance	NIH, UCLA, and the U.S. Government reasonably rely on transparency in patent disclosures, origin tracking, and research data integrity (See Bayh-Dole Act, USPTO regulations). Misuse of external hard drives and data erasure compromised this reliance, nullifying legitimate claims of discovery origin and inventorship (See Exhibit 37.45).
Element 5 – Damages	The foreign patent filings on American-funded research, timed with institutional data compromise, represent theft of U.S. intellectual property. This undermines national security, damages international trust, threatens future collaborations, and compromises the credibility of publicly funded science (See Exhibit 37.47).
Element 6 – Causation	The erasure of institutional records and off-grid storage directly enabled the wrongful appropriation and filing of patents abroad. But for these actions, the link between Gulesserian’s work and the misappropriated patent content would have been clear, and rightful inventorship preserved (See Exhibits 37.22, 37.45, and 37.47).

Exhibit 37.48: Fraud Elements – Misrepresentation of Protocols by the Novitch Lab and Collaborators

It is submitted and alleged without limitations and among other things as follows:

Fraud Element	Explanation
Element 1 – Misrepresentation of a Material Fact	The Novitch lab and associated researchers presented a poster presentation (37.40) as if the discovery were not the novel serendipitous Gulesserian protocol, but rather the former traditional, feeder dependent Novitch method (See Exhibits 37.2), and not the Gulesserian serendipitous accidental discovery (37.22). This constitutes a misrepresentation of scientific origin and novelty that was intentional from day 1 from Bennett Novitch and co-conspirators (See exhibit 37.8) narrative change.
Element 2 – Knowledge of Falsity (Scienter)	Internal communications (See exhibit 37.12) and poster documentation (See exhibit 37.40) show that the Novitch lab was aware of the origin differences (See exhibit 37.35), yet selectively compiled parts of older methods to replicate the unique results of the Gulesserian protocol without crediting the actual discovery process (See Exhibit 37.40) or reporting it to the federal government (See NIH reporting duties).
Element 3 – Intent to Deceive	By merging elements of former protocols (See exhibit 37.2 37.22 37.40, 37.34, 37.38) with superficial similarities to the Gulesserian method, the lab created a false impression of convergence or simultaneous discovery. This deception served to falsely claim priority or dilute the novelty of Gulesserian’s work (See Exhibit 37.8,

Fraud Element	Explanation
Element 4 – Justifiable Reliance	<p>37.40) to obtain grants and personal gain all at the same time without reporting it to the federal government.</p> <p>The scientific community, funders, and patent offices depend on accurate disclosures regarding research methods and origins including those in role model positions as supervisors and/or investigators. Misrepresenting the novelty (See exhibit 37.8) and lineage of protocols misleads peer reviewers, funding bodies, and IP offices (See NIH standards, Bayh-Dole compliance).</p>
Element 5 – Damages	<p>The denial of recognition and attribution to the true inventor (See exhibit 37.30) compromises professional credit, intellectual property rights, and institutional reputation among other things and now requires federal oversight. It also leads to potential patent invalidation and ethical violations in federally funded research (See Exhibits 37.22, 37.48 among others).</p>
Element 6 – Causation	<p>The deliberate repackaging of the feeder-dependent method as equivalent to the novel, feeder-independent Gulesserian protocol enabled false claims of discovery and diverted rightful credit and potential IP protection from the actual innovator (See Exhibits 37.2, 37.22, 37.40) and has caused direct harm to the US government among other stakeholders.</p>