

Title of These Exhibits: The Galleglys Coordinate Complaints to the CA Attorney General

Description of Communication

The following is a set of July 2021– Jan 2022 communications from Elton and Janice Gallegly (the “Galleglys”) to several friends and the Attorney General of California. This particular set shows the extent to which the Galleglys asked their friends to send a complaint against CLU to the Attorney General of California (AG). The emails further demonstrate the coaching and instruction the Galleglys provided to community members, most of whom have had nothing to do with the complaint they were bring asked to send.

All of these communications and attachments were produced during Phase One of Gallegly v. CLU discovery process. Since they are all part of the official court record, they are open to public review and scrutiny.

Items of Note

- The text has been extracted from a longer document, so formatting may be altered.
 - Emphasis has been added in several areas.
 - The content and wording are unchanged.
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Date: July 31, 2021
Subject: Email with E. Gallegly asking F. Visco to complete and send AG complaint form

From: Elton Gallegly [elton.w.gallegly@gmail.com]
Sent: 7/31/2021 2:43:19 PM
To: Frank Visco [frank@viscofinacial.com]
Subject: Attorney General Complaint Forms
Attachments: Attorney General Complaint Form.pdf; Untitled attachment 00004.htm

Hi Frank

Frank, thank you for taking my call while you are down in Mexico! I appreciated you giving me the time to explain what's happening at CLU and that our attorney's need us to ask CLU donors to file a complaint. "No good deed goes unpunished"! It has been quite an ordeal but we are survivors and fighters. Someone has to stand up for what is going on across our country and in our universities.

Our attorneys have asked that we forward some complaints forms to some of the major donors to review to see if they are willing to file a complaint with the Attorney General against Cal Lutheran. Thus, I am forwarding the forms for your consideration. **Our attorney's office is going to forward me some sample answers to the questions that I will pass on to you or their office is more than happy to speak with you to help in completing the form.**

I also attached a sample first page that has the information you will need on CLU to complete top of the form. You can actually fill out the form on-line which would be easier than using the enclosed forms at

<https://oag.ca.gov/charitics/complaints>.

Would you please take the time to talk to Alan Skobin and forward this email to him to see if Bert would be willing to file a complaint form for us as well. I'd welcome the opportunity to talk to Bert or Alan and give them the background on what's happening with the Gallegly Center.

Hope you can help us - call with any questions. Enjoy your time in Mexico. Look forward to seeing you soon.

Elton

Date: July 31, 2021
Subject: Email with J. Gallegly asking S. Groff
To complete and AG Complaint Form

From: Janice Gallegly [janicegallegly@gmail.com]
Sent: 7/31/2021 4:05:00 PM
To: Susan Groff [susangroff@me.com]
Subject: Re: Attorney General Complaint Forms

Sue - Let me know if you need help - you can fill it out on line which would be easier.

<https://oag.ca.gov/charities/complaints>

Call if you have questions and, if possible, send me a copy by email or mail. Also, let me know if Michael files as well. Thanks

Janice

On Jul 31, 2021, at 3:47 PM, Susan Groff <susangroff@me.com> wrote:

Thanks Janice. I will take care of this.

Sue

Sent from my iPad

On Jul 30, 2021, at 6:44 PM, Janice Gallegly <janicegallegly@gmail.com> wrote:

Hi Sue

Elton told me the two of you had quite a discussion about what is attorney wants for us to file on CLU with the Gallegly Center. "No good deed goes unpunished"! It has been quite an ordeal but we are survivors and fighters. Someone has to stand up for what is going on across our Country and in our Universities.

Our attorneys have asked us to get some complaints filed with the District Attorney against CLU. **Elton asked me to forward you the forms for you and Michael to review to see if this is something you are willing to do.** Their office will be forwarding me

some sample answers to the questions that I will pass on to you or they would be
happy to speak with you as well - should you decide to proceed with the complaint.

On the sample I sent for the top information, I would delete the second line that asks for other names the university uses.

Hope this helps - call us with any questions.

Love,

Janice and Elton

<Attorney General Complaint Form.pdf

Date: July 31, 2021
Subject: Email with J.&E. Gallegly asking "CG and Vikki"
to complete and send AG complaint form

From: Elton Gallegly [elton.w.gallegly@gmail.com]
Sent: 7/31/2021 11:35:21 PM
To: cgkumvk@gmail.com
Subject: Attorney General Complaint form
Attachments: Attorney General Complaint Form.pdf; Untitled attachment 00004.htm

Hi CG and Vikki

I thought I sent this information to you - but my computer had a problem and I had to shut her down. Unfortunately, I lost and can't find much of what I did late yesterday afternoon. So, if this is a repeat, I apologize.

Elton told me you had quite a discussion about what is attorney wants for us to file on CLU with the Gallegly Center. "No good deed goes unpunished"! It has been quite an ordeal but we are survivors and fighters. Someone has to stand up for what is going on across our Country and in our Universities.

Our attorneys have asked us to get some complaints filed with the District Attorney against CLU. Elton asked me to forward you the forms for you to review to see if this is something you are willing to do. The attorney's office will be forwarding me some sample answers to the questions that I

will pass on to you or they would be happy to speak with you as well - should you decide to proceed with the complaint.

I sent a sample first page that has the information you will need on CLU. You can actually fill out the form on line which would be easier than using the enclosed forms - <https://oag.ca.gov/charities/complaints>.

Hope this helps - call us with any questions. Would be great to have some time to chat and get caught up on each others families and activities!

Janice and Elton

State of California Department of Justice



ROB BONTA
Attorney General



Filing a Complaint About a Charity or Charitable Solicitation

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In California, the Attorney General has primary responsibility for supervising charities, charitable trusts, and professional fundraisers that solicit donations on their behalf. The Attorney General's oversight involves protecting charitable assets and donations for their Intended use, prohibiting deceptive or coercive charitable solicitations, and ensuring compliance with the charitable organization's governing documents, such as the articles of incorporation or trust documents. To this end, the Attorney General investigates charitable organizations and fundraisers and brings administrative and legal enforcement actions against them, See the Charities home page and links on the right for more details about specific programs, laws, forms and the Registry Verification Search tool.

The Attorney General encourages the public to file complaints regarding a charity or charitable solicitation using the Complaint Form (Form CT•9) available below,

Form CT-9

Charity Complaint Form

This form is required to file all complaints regarding charities or fundraising professionals with the Attorney General's Registry of Charitable Trusts,

In addition to filing a complaint with the Attorney General's Registry of Charitable Trusts, consider also filing complaints with:

- Better Business Bureau: (916) 443-6843
- Department of Consumer Affairs: (916) 445-1254
- Local Police Department
- Internal Revenue Service

Contact the Complaints Program

Frequently Asked Questions

1. Can I call in a complaint or file a complaint using email?
2. I filed a complaint but didn't get a response. How can I see the results or status of my complaint?
3. How do I know which complaints gets investigated?
4. What if I have more information about suspected unlawful activities by a charity but didn't include it in the last complaint?
5. I think this charity is doing something wrong, Can you tell me the laws it is violating?
6. I am being mistreated by board members or leadership. Can I file a complaint?
7. I have just been solicited by a charity. How can I tell if it is legitimate?
8. How can I check out a charity?
9. Can't I get information about a charity's operations and expenditures directly from the charity?
10. What is the role of governmental agencies regarding charities?
11. What does the Attorney General investigate?
12. What does the Attorney General's Office generally not investigate?

13. What can I expect when I submit a complaint to the Attorney General's Office
about a charity or a charitable solicitation?



for the of your form

1300 I Street
P.O. Box 903447
Sacramento, CA 94203,4470
(916) 210,6400
Fax: (916) 444,3651
Complaints@doj.ca.gov

COMPLAINT TO THE CALIFORNIA ATTORNEY GENERAL
REGARDING A CHARITY OR CHARITABLE SOLICITATION

Name of Organization: California Lutheran University

List any other names the organization uses: _____

Address of organization: 60 W. Olsen Road

City, State, ZIP: Thousand Oaks; CA 91360

Organization Telephone Number: 805-492-2411 Organization Web address: callutheran.edu

other identifying information for the corporation, if known:

Corporate # _____ State Charity Registration # _____ FEIN: 95--2962604

Briefly summarize the main point of your complaint here (Attach additional pages for the details of your complaint, if necessary):

Have charitable funds or other assets been lost, wasted or diverted from proper charitable purpose? Or, is there a danger that such loss will soon occur? Please explain, giving your best estimate of the amount lost or at risk, if you know:

What action has already been taken, either within the organization or with other law enforcement agencies, to try to resolve this problem:

List the names, addresses and telephone numbers, if known, of all persons you believe may be responsible for this problem:

List the names, address and telephone number of any other persons who may have additional information concerning the complaint:

Your name, address and telephone number: _____

Date: _____

Check here if you request that your identity be kept confidential.

Mail the completed form and any attachment to: Registry of Charitable Trusts, Office of Attorney General, P.O. Box 903447, S

COMPLAINT TO THE CALIFORNIA ATTORNEY GENERAL
REGARDING A CHARITY OR CHARITABLE SOLICITATION

Name of Organization: _____

List any other names the organization uses: _____

Address of organization: _____

City, State, ZIP: _____

Organization Telephone Number: _____ Organization Web address: _____

Other identifying information for the corporation, if known:

Corporate# _____ State Charity Registration# _____ FEIN: _____

Briefly summarize the main point of your complaint here {Attach additional pages for the details of your complaint, if necessary):

Have charitable funds or other assets been lost wasted or diverted from proper charitable purposes? Or, is there a danger that such loss will soon occur? Please explain, giving your best estimate of the amount lost or at risk, if you know:

What action has already been taken, either within the organization or with other law enforcement agencies, to try to resolve this problem:

List the names, addresses and telephone numbers, if known, of all persons you believe may be responsible for this problem:

List the names, address and telephone number of any other persons who may have additional information concerning the complaint

Your name, address and telephone number: _____

Date: _____

Check here if you request that your identity be kept confidential.

Mail the completed form and any attachment to: Registry of Charitable Trusts, Office of Attorney General, P.O, Box 903447,
Sacramento, CA 94203-4470,

Office of the Attorney General

Registry of Charitable Trusts

Privacy Notice

As Required by Civil Code § 1798.17

Collection and Use of Personal Information. The Attorney General's Registry of Charitable Trusts, a part of the Public Rights Division, collects the information requested on this form as authorized by the Supervision of Trustees and Fundraisers for Charitable Purposes Act (Gov. Code § 12580 et seq.) and regulations adopted pursuant to the Act (CaL Code Regs., tit 11, §§ 300-312.1). The Attorney General's Charitable Trusts Section uses the information in the administration and enforcement of the Act, including investigations, law enforcement actions, and making referrals to other law enforcement agencies. Any personal information collected by state agencies is subject to the limitations in the Information Practices Act and state policy. The Department of Justice's general privacy policy is available at <http://oag.ca.gov/privacy-policy>.

Providing Personal Information. Providing personal information requested in the form, including your name, address, and telephone number, is voluntary. If you do not provide this information, however, any investigation may be limited due to our inability to contact you.

Access to Your Information. Unless you consent or required by law, the Attorney General will not make available to the public your personal information. You may review the records maintained by the Attorney General that contain your personal information, as permitted by the Information Practices Act. See below for contact information.

Possible Disclosure of Personal Information. We may be required to share the information with other government or law enforcement agencies. The information you provide may also be disclosed in the following circumstances:

With other persons or agencies where necessary to perform their legal duties, and their use of your information is compatible and complies with state law, such as for investigations or for licensing, certification, or regulatory purposes;

To another government agency consistent with state or federal law.

Contact Information. For questions about this notice or access to your records, contact the Registrar of Charitable Trusts, 1300 I Street, Sacramento, CA 95814 at rct@dj.ca.gov or (916) 210-640

Date: August 25, 2021
Subject: Email with J. Gallegly asking J. Young
to complete and send AG complaint form

Message

From: Janice Gallegly [janicegallegly@gmail.com]
Sent: 8/25/2021 10:44:35 AM
To: Young, Joan [Joan.Young@Sothebys.Realty]
Subject: More information re AG

Joanie

Please go on line to get a blank form to file at oag.ca.gov/charitics/complaints. Mail your complaint to the address at the bottom of the form and also please fax a copy of the form to us at 805-'526-1546 or email it to ewgilg@roadrunner.com.

Date: January 21, 2022
Subject: Letter from E.Gallegly to Attorney General
Bonta
asking the AG to investigate Cal
Lutheran's handling of fundraising
dollars

Elton Gallegly



January 21, 2022

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Sacramento, CA 95814-2919

Dear Attorney General Bonta,

I am writing you to request that your office commence an investigation into Cal Lutheran University's handling of nearly \$1 million raised by donors for The Elton and Janice Gallegly Center for Public Service and Civic Engagement at California Lutheran University.

I had the honor to represent Ventura County while serving in the United States Congress from 1987 to 2013. In 2012, before retiring from Congress, I reached a written agreement with CaJ Lutheran University to establish the Gallegly Center, The Center was constructed to be a meeting place for public service and civic engagement and contain an exact replica of my Washington, D,C Congressional office. Also, included in the agreement was digitally archiving my 26 years of papers and documents, a distinguished speakers series, and the Gallegly fellowship

program, My wife and I led the fundraising effort for the Center and raised over \$1 million from over a hundred of donors.

While some funds have been expended over the past several years, I and others have become concerned over Cal Lutheran's stewardship of the money raised, I communicated those concerns on April 6, 2021 in a Zoom call with current Cal Lutheran President Lori Varlotta and several others, including my attorney and Cal Lutheran's attorney. In that call, President Varlotta committed to conducting a "forensic audit" of the money that had been raised for the Gallegly Center. On June 3, 2021, the attorney for Cal Lutheran emailed my attorney and said the University would not conduct the forensic audit promised.

Cal Lutheran's refusal to account for the funds raised, and their decision to cancel a forensic audit to which the school President had agreed, is very concerning. I persuaded hundreds of people to give money to this project and feel I have an obligation to account for their donations.

In light of the refusal by Cal Lutheran to provide an accounting for the funds raised, I believe an outside body with legal authority, such as your office, must investigate Cal Lutheran's handling of the money raised and spent for possible violations of Penal Code sections 503-513,

Sincerely,



Elton Gallegly

Please do not hesitate to contact me if you have any questions.