

Title of These Exhibits: The Galleglys Work to Undermine CLU Relationship with Reagan Library

Description of Communications

The following document begins with a set of late August 2021 communications between Elton and Janice Gallegly (the “Galleglys”), their attorney at the time, Charlie Slynstad, and the Director of the Ronald Reagan National Library, John Heubusch, with whom CLU has enjoyed a positive and productive professional relationship. This particular set of emails shows that the Galleglys are working to have Heubusch dissolve the MOU agreement between CLU and the Reagan Library. That MOU allows CLU to use the “Reagan” name in the fellowship program. The Galleglys will later work with their contracted PR firm to blame the dissolution of the MOU agreement on Varlotta.

The document ends with a December 2021 email from Janice Gallegly to John Heubusch. In this note, she is providing him with specific strategies he can use to end the relationship with CLU.

All of these emails 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.

Date: Late August 2021
Subject : Email series with Galleglys asking their attorney how and when they should get the Director of Reagan Library to end relationship with Cal Lutheran

From: Janice Gallegly [<mailto:janicegallegly@gmail.com>]
Sent: 9/1/2021 10:04:50 AM
To: John Heubusch <jheubusch@reaganfoundation.org>
Subject: Fwd: MOU and edited version of email from Heubusch

Good morning John,
Below is a copy of the response we received from our attorneys regarding the MOU with CLU. If you have any different thoughts or suggestions, please don't hesitate to call us.
Thanks.

Elton and Janice

Begin forwarded message:

From: "Slyngstad, Charles
E." <CSlyngstad@bwslaw.com> Subject: RE: MOU and
edited version of email from Heubusch Date: August 31,
2021 at 4:29:31 PM PDT
To: Janice Gallegly <janicegallegly@gmail.com>, elton Gallegly <elton.w.gallegly@gmail.com>
Cc: "Welsh, John J." <JWelsh@bwslaw.com>

Elton and Janice-

We have carefully reviewed the MOU and the circumstances and allegations needed to make a contractual issue about it at this time, and our advice remains to hold the status quo for now. There will be time to act well before John Heubusch retires.

Thank you,
Charlie

From: Janice Gallegly [<mailto:janicegallegly@gmail.com>]
Sent: Monday, August 30, 2021 11:18 AM
To: Slyngstad, Charles E. <CSlyngstad@bwslaw.com>; Welsh, John J. <JWelsh@bwslaw.com>
Cc: elton Gallegly <elton.w.gallegly@gmail.com>
Subject: Fwd: MOU and edited version of email from Heubusch

Good morning Charlie and John

We wanted to follow-up on the below email regarding the use of the name of President Reagan for the Reagan- Gallegly Fellowship MOU with CLU. FYI, John Heubusch, Executive Director of the Ronald Reagan Presidential Foundation will be retiring December 31, 2021. He will do whatever you feel is in our best interest for this case. Please advise

Elton and Janice

Begin forwarded message:

From: Elton Gallegly <elton.w.galleglu@gmail.com>
Subject: MOU and edited version of email from Heubusch
Date: August 23, 2021 at 2:58:47 PMPDT
To: "Slyngstad, Charles E. <cslvagstad@bwslaw.corn>

Charlie

I am not sure if I sent this version which was somewhat edited by John Heubusch of the RRPf. So am sending correct version this time with the MOU attached!

Janice

Thanks, Janice. I've made edits to the note below. I presume that this note is a private communication between Elton/you and your attorneys. If that's correct, then the note, as edited, works for me.

All the best.

-----Original Message

From: Janice Gallegly <janicegallegly@gmail.com>
Sent: Friday, August 20, 2021 3:57 PM
To: John Heubusch <jheubusch@reaganfoundation.org>
Subject: [EXTERNAL] Draft - CLU/Reagan Gallegly MOU

John - here is draft I have put together for our attorneys. Please review and modify to your satisfaction.

Good afternoon John and Charlie,

We met with John Heubusch; Executive Director of the RRPf this morning and he is very unhappy with our situation involving CLU.

Attached is the MOU that was executed by John Heubusch, and Chris Kimball, President of CLU. Would you please review the MOU and, given the present circumstances, **give us your opinion as to whether or not the Reagan Foundation has the ability, prior to the 3-year expiration date of the agreement, to prevent CLU from continued use of its name in relation to the Reagan-Gallegly fellowship? In other words, can the Reagan Foundation consider CLU to be in breach of its contract with Elton, thereby providing the basis for nullifying its own agreement with CLU?**

If so, a letter from John Heubusch expressing the Reagan Foundation's concern over the recent

intended changes and uses by CLU of the Gallegly Center, the replica office, the speakers series, and lack of commitment to the Reagan-Gallegly Fellowships -- one stating that such actions are totally unacceptable to the Ronald Foundation -- **could be sent.**

The reason the RRPf partnered with CLU and the Gallegly Center in the first place was simple: to honor Elton and Janice Gallegly, and their many years of service to this community and our country. The changes CLU apparently intends to make regarding the Center violate the intent and spirit of the agreement and are unacceptable.

Thank you for your counsel.
Elton and Janice

From: Elton Gallegly <elton.w.gallegly@gmail.com>
Subject: MOU and edited version of email from Heubusch
Date: August 23, 2021 at 2:58:47 PMPDT
To: "Slyngstad, Charles E. <cslvagstad@bwsllaw.co.in>

Charlie

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Thanks, Janice. I've made edits to the note below. I presume that this note is a private communication between Elton/you and your attorneys. If that's correct, then the note, as edited, works for me.

All the best.

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Subject: [EXTERNAL] Draft - CLU/Reagan Gallegly MOU

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Attached is the MOU that was executed by John Heubusch, and Chris Kimball, President of CLU. Would you please review the MOU and, given the present circumstances, give us your opinion as to whether or not the Reagan Foundation has the ability, prior to the 3-year expiration date of the agreement, to prevent CLU from continued use of its name in relation to the Reagan-Gallegly fellowship? In other words, can the Reagan Foundation consider CLU to be in breach of its contract with Elton, thereby providing the basis for nullifying its own agreement with CLU?

If so, a letter from John Heubusch expressing the Reagan Foundation's concern over the recent intended changes and uses by CLU of the Gallegly Center, the replica office, the speakers series, and lack of commitment to the Reagan-Gallegly Fellowships -- one stating that such actions are totally unacceptable to the Ronald Foundation -- could be sent.

The reason the RPPF partnered with CLU and the Gallegly Center in the first place was simple: to honor Elton and Janice Gallegly, and their many years of service to this community and our country. The changes CLU apparently intends to make regarding the Center violate the intent and spirit of the agreement and are unacceptable.

Thank you for your counsel.

Elton and Janice

From: Janice Gallegly Oanicegallegly@gmail.com)
Sent: 8/20/2021 3:57:06 PM
To: John Heubusch Oheubusch@reaganfoundation.org]
Subject: Draft - CLU/Reagan Gallegly MOU
Attachments CLU_Reagan Foundation MOU.pdf

John - here is draft I have put together for our attorneys. Please review and modify to your satisfaction.

Good afternoon John and Charlie

we met with John Heubusch, Executive Director of the RPPF this morning and he is very unhappy with what is going on at CLU, Attached is the MOU that was executed by John Heubusch, and Chris Kimball, President of CLU - Would you please review the MOU and give your opinion as to whether or not a strong letter would be helpful from John Heubusch expressing the recent intended changes and uses by CLU of the Gallegly center, the replica office, the speakers series, and lack of commitment to the Reagan-Gallegly Fellowships is totally unacceptable to the Ronald Reagan Presidential Foundation and Institute.

The reason the RPPF partnered with callutheran and the Gallegly Center to lend the name of the 40th President and offer the Reagan-Gallegly Fellowship is simple - it is Elton and Janice Gallegly, and their many years of service to this community and our country.

of course, the letter would be in John's words - not those printed above.

In addition, to trying to be helpful, John would like your opinion - "should the University dig their heels in on their demands, does the RPPF have an out prior to the end of 3 years on the MOU.

Thank you for your counsel.

Elton and Janice

From: Janice Gallegly [janicegallegly@gmail.com]
Sent: 12/6/2021 11:32:41AM
To: John Heubusch [jheubusch@reaganfoundation.org]
Cc: elton Gallegly [elton.w.gallegly@gmail.com]
Subject: Meeting with Pres. Varlotta
Attachments: Gallegly Center Opposition Voices FNL.pdf; Untitled attachment 00045.txt

John

I know I sent you a lot of material - but thought you may want to see how we got from point A to point B. The most important legal documents for you to read are the ones dated 6-18 from our attorney David Laufer and their one page response on 6-28 and CLU's attorney Baker transmittal dated July 23. I also attached a copy of the lawsuit you requested.

One of your best arguments is that the Reagan-Gallegly fellowship was to be in perpetuity and CLU is only committing to 3 years. The first two years for which they have the funds from money we raised and the third year where they claim to reallocate funds to cover. After that the fellowship will be contingent on CLU's ability to raise the funds.

Well, CLU has depended on us to raise all the funds up to now. Saying the VP's office of Advancement will aggressively fund raise is a joke.

CLU was to be entirely responsible for the archiving of the documents. But in order to get started on the archiving, CLU said we had to raise \$150,000. We designed a flyer and prepared a letter which Elton signed - we stuffed, stamped and mailed to raise funds for the archiving by Heritage contract and then after we had the funds requested by CLU to proceed, they did the bait and switch on us notified Heritage they would not be using them without our knowledge and hired another unnamed company.

As for the Distinguished Speaker's Series, which you have so graciously help us with Sec. Condoleezza Rice being our first Distinguished Speaker, they now plan to have symposiums with local speakers.

The removal of the Congressional office because it is needed for storage of the boxes is a lame excuse. Rather it is just their way of satisfying the left dissidents that we have proof of in the Gallegly Opposition Voices which I previously sent but am attaching again.

