

Yellow highlights throughout this document were added for emphasis
These documents were exported from a pdf file; formatting nuances did not export uniformly

EXHIBIT 1

Date: July 31, 2021
Exhibit Name: 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@viscofinancial.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

EXHIBIT 2

Date: July 31, 2021

Exhibit Name: 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

EXHIBIT 3

Date: July 31, 2021

Exhibit Name: 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 1:35:21 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

[Home](#) / [Charities](#) / [Filing a Complaint About a Charity or Charitable Solicitation...](#)

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



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

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

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

1300 I Street
P.O. Box 903447
Sacramento, CA 942034470
(916) 210-6400
Fax: (916) 444-3851
Complaints@doj.ca.gov

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@dqi.ca.gov or (916) 210-6400

EXHIBIT 4

Date: August 25, 2021

Exhibit Name: 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.

EXHIBIT 5

Date: January 21, 2022

Exhibit Name: 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

The Honorable Rob Bonta
Office of the Attorney General
1300 "I" Street
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,

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

Sincerely,



Elton Gallegly

EXHIBIT 6

Date: August 8-13, 2021
Exhibit Name: Email series with J.&E. Gallegly telling James Lacey
“we need to keep pressure on” and offering to monitor
content of submissions

Message

From: Janice Gallegly [janicegallegly@gmail.com]
Sent: 8/13/2021 2:56:07 PM
To: James Lacey [james@healthyventures.com]
Subject: Re: CDC Numbers year on year regarding US deaths. Interesting data, pass them on.

Thank you James
Janice

On Aug 13, 2021, at 2:10 PM, James Lacey <james@healthyventures.com> wrote:

Thanks, yes, three letters will be coming. I am sure they will be done by Monday.

James P. Lacey
CEO/Managing Partner
Berry Naturals, Inc.
780 Lakefield Rd Unit G
Westlake Village, CA 91361
Work: 805.409.9004
Cell: 805.390.6274

From: Elton Gallegly <janicegallegly@gmail.com>
Sent: Friday, August 13, 2021 11:54 PM
To: James Lacey <james@healthyventures.com>
Subject: Re: CDC Numbers year on year regarding US deaths. Interesting data, pass them on.

Hi James

Do we have any letters to the editor yet? Or to the University? Or both? I understand our former sheriff, Bob Brooks' letter was published in the TO Acorn yesterday or today. It was published last week in the Simi edition. It was a very good letter. We need to keep the pressure on. Please send copies and if you question any content- run it by us first. Thanks
Janice

On Aug 8, 2021, at 8:01 PM, James Lacey <james@healthyventures.com> wrote:

Hi I met with Daniel and Nick yesterday for lunch and boat ride and We talked for 3 hours. We all will be writing the letters. They will be excellent. I really like Nick, good down to earth guy. Keep you posted.

James Lacey
Managing Partner
Healthy Ventures; LLC
780 Lakefield Rd. Unit- G
Westlake, Village, Ca 91361
Office# 805-409-9004
Cell # 805-390-6274
James@HealthyVentures.com

On Aug 8, 2021, at 6:37 PM, Elton Gallegly <elton.w.gallegly@gmail.com> wrote:
I'm am with you

Sent from my iPhone

EXHIBIT 7

Date: August and September 2021

Exhibit Name: Email series with Gallegly's 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.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." ¹¹ <cslvagstad@bwslaw.co.in>

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@bwslaw.co.in>

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: Janice Gallegly (janicegallegly@gmail.com)
Sent: 8/20/2021 3:57:06 PM
To: John Heubusch (jheubusch@reaganfoundation.org) Draft
Subject: - 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 RPF 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

EXHIBIT 8

Date: November 22-23, 2021

Exhibit Name: Series of text messages between E Gallegly and PR expert Rob Stutzman regarding when to release the Heubusch letter in an effort to “keep pressure on Varlotta and overwhelm her”

iMessage;-;+19162963416 - 2021-11-23

Elton Gallegly <8055015400>
Rob

11/22/2021, 6:29 PM

I am I correct that the Heubusch letter is meant to be press release as soon as copy is sent to Valotta and Bill Camarillo??

Rob Stutzman PR <9162963416>

11/22/2021, 7:17 PM

Yes. Although at this point I'd wait until post holiday.

Elton Gallegly <8055015400>

11/22/2021, 7:37 PM

I'm sure you are right .
But I really would like to overwhelm her to stay on defense
Clearly if we don't use yet. , it good to have in the can _
Might like to show to CBS if you agree., only because I want to keep their interest
Remember they came to me.
It's primarily Linda Breakstone. She retire but she is still god to some the old timers .
Thank keeping me on point.

I am hoping to have something from very prominent former VP Dennis Gillette, and get former board member and D A Mike Bradbury in the can .
Also like to talk how we can best use Wheatly, he knows ALL the facts and promises, lack of accounting records, they screwed him , I will fill you in .
There is so much it could make a TV series.
Janice and I protected image of the University.
Lori Valotta doesn't have a clue and she has some major challenges that she has created by her lack of knowledge.
Remember we have 8 or 9 very valuable of our advisory committee that are bright community leaders
That are very loyal and angry with university .
Thank you and Kelly again

Rob Stutzman PR <9162963416>

11/22/2021, 8:59 PM

LA TV now thru Sunday will be all Santa winds, travel/traffic and Black Friday. And their crews go to holiday staffing after Wed. CLU will still be on defensive if we launch next wave on them next Monday.

Elton Gallegly <8055015400>

11/22/2021, 9:05 PM

You are the brain trust !!
Can we be ready to drop early next week .
Do you agree we need to stay ahead _
Im happy to help on my end to stay a step ahead

Rob Stutzman PR <9162963416>

11/22/2021, 9:20 PM

Yes. Keep offense up do a while. But at some point CLU needs the space to make it right You're not trying to divorce them so it can't get too acrimonious.

Elton Gallegly <8055015400>

11/22/2021, 9:39 PM

You are correct, however. My fear is that Valotta has apparently made serious commitments to her left rebels. She has even given them a seat on the board regents .
I appeal to you to look a transcript from event on May 20,2020, if you haven't seen let's talk
She has already let them take over our entire building that we built and paid for
Per University agreement before she came in .
I believe we have get her nailed to the truth .
As you know she is in trouble with her own performance ,our trump card is the truth. The last thing the regents want to see to much public.
I believe she has no choice but to come to table and pressure is only thing that will make that happen .
We have power in the community.
Remember I've lived here for 54 years, she has been here less than 11/2 years.
She is a feminist bully .
The title feminist is (her word(bully is obviously to everyone)

Elton Gallegly <8055015400>

Rob11/22/2021, 10:09 PM

Janice and I have protected the image of the University
For 9 years as joanie has for 30 years , as Wheatly has more than many years by keeping our mouths shut.
we have had Regents walk and all this in last couple of years
The community does not want a Berkeley and they are the ones paying the bills.
I am a terrible text person
And not good at it.
No one is better at trying to resolve with honest dialogue that I am .
If you had any idea how many times I've said today is the first day of the first day of the rest of our lives . I have no
option than plan B
Janice and I are almost 80
We can't play Patty Cake another 9 years .
I have no less than 25 prominent people appealing for us aggressively move ahead to save the University.
Hope we can help Bradbury
Get his letter before the holiday .
As he is highly respected throughout California.
Thanks for putting up with me I won't disappoint you

Rob Stutzman PR <9162963416>

11/23/2021, 8:21 AM

Yes, will have something for Bradbury today. Will do letter to editor length. Will be faster to place and can submit to more than one publication that way.

Elton Gallegly <8055015400>

11/23/2021, 8:28 AM

Sounds great
Remember as a former DA he should be very concerned about the audit issues .
(your call on that)

Need real heat on Valotta,

Mike has been very very pro
Elton and Janice for over 35 years

Rob Stutzman PR <9162963416>

11/23/2021, 8:42 AM

Yes. Will focus on the lack of fiscal transparency and concerns money May have been misspent.

Elton Gallegly <8055015400>. 11/23/2021, 8:57 AM

Remember with all the promises of Chris Kimball elton and janice would never have to ask for donations or donate . Facts : Elton and janice raised almost the total cost of construction of the new center, and over 80 percent came from donors that had never donated to CLU before . (Per Steve Wheatly) Elton and Janice provided for Fellowships for 12 Masters degree overwhelmingly minorities Recipients and we are proud of that .Also at request of Chris Kimball his first choice for speaker Forum Was Condoleezza Rice Elton made request and confirmed with in a couple of days . The largest turnout for a speaker ever. Result University has blocked our use of our own. Building almost entirely and Library has taken total control after trying to block construction from day one The real details are crystal clear (all of this for back ground and easy to confirm) Important to remember The concept of Center , Replica Office, where building site was to be , Speaker forum, mandatory Advisory committee , all of this and more we're idea of University (verify Steve Wheatly)Now new president he'll bent on destroying all of it .

EXHIBIT 9

Date: December 6, 2021
Exhibit Name: Email with J. Gallegly's presenting Director of Reagan Library
with an argument he could use
to end relationship with Cal Lutheran

From: Janice Gallegly [janicegallegly@gmail.com]
Sent: 12/6/2021 11:32:41AM
To: John Heubusch [jheubusch@reaganfoundation.org]
Cc: elton Gallely [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.

EXHIBIT 10

Date: December 31, 2021
Exhibit Name: Text Series between E. Gallegly and R. Stutzman to
“turn the heat up” on two issues:
To get the Reagan Library Letter out and have “all the donors sign
onto a letter demanding to see the books.”

iMessage;-;+19162963416 - 2021-12-31

Elton Gallegly <8055015400>

12/31/2021, 9:18 AM

Rob

Do you have any relationship with Daily News San Fernando Valley
Adjacent to Simi and Thousand Oaks ?

Rob Stutzman PR <9162963416>

12/31/2021, 9:34 AM

Still some. LA Newspaper Group is a federation of about 9 papers including Daily News. The only veteran political

reporter left is Martin Wisckol

Elton Gallegly <8055015400>

12/31/2021, 9:38AM

I'm very familiar with history of Daily News(Green sheet)
All of those journalists are gone since I retired but the paper still has circulation.
I am getting new people everyday that want to support.
It's encouraging that more and more people everyday are support us that I have never heard of.

Rob Stutzman PR <9162963416>

12/31/2021, 9:39 AM

Yes, seems the organic support is kicking in.

Elton Gallegly <8055015400>

12/31/2021, 9:41 AM

Is it a good idea , if you have
Relationship, to talk to Martin
After all our story is not just a ventura county issue .
CLU nightmare is to be identified

Elton Gallegly <8055015400>

12/31/2021, 9:46 AM

Reagan library really hit a nerve for Vallota I'm told that there is reason to believe she has reason to be concerned with
offending the library
Need to turn heat up there without forgetting audit first ??

Rob Stutzman PR <9162963416>

12/31/2021, 9:57 AM

Daily News has been on press list I can see what Martin suggests. He doesn't write on politics anymore. Re: audit The
lawsuit essentially demands an accounting of money. **Would want lawyers to ok, but could have all the donors sign
onto a letter demanding to see the books.**

Elton Gallegly <8055015400>

12/31/2021, 10:21 AM

Please advise on Martin ,
It could get attention of President
I will talk to John and Charlie re donor letter in our meeting Tuesday

Rob Stutzman PR <9162963416>

12/31/2021, 10:33 AM

I'll check in with Martin

Elton Gallegly <8055015400> Ty!!!

EXHIBIT 11

Date: November 2021
Exhibit Name: Email chain with J.&E Gallegly drafting letter for
Mike Bradbury to sign

From: Janice Gallegly [janicegallegly@gmail.com]
Sent: 11/23/2021 7:44:49 PM
To: Michael Bradbury [mbradbury55@gmail.com]
Cc: elton Gallegly [elton.w.gallegly@gmail.com]
Subject: Re Draft letter to the Editor - Gallegly and CLU

Hi Mike

Attached is a draft letter to the editor for your consideration. Mike, any modifications you can personally add, subtract or change are welcome.

Elton and Janice

California Lutheran University should honor its commitment to former United States Congressman Elton Gallegly and fully establish the Gallegly Center For Public Service and Civic Engagement on its campus.

As the elected District Attorney for Ventura County from 1979-2003, I saw firsthand Elton's longstanding dedication to the community and to his constituents. The Gallegly Center was to be equally focused on the importance of public service, which is a concept that fits well with the overall mission of the university.

At California Lutheran University's request, Elton and Janice Gallegly agreed to partner with the university to build the Gallegly Center including an exact replica of his Washington DC office, archive Elton's papers, launch a speakers forum and fund fellowships promoting public service. I personally know that the Gallegly's have worked tirelessly to do everything the university asked of them to make it a huge success and to secure the funding for the full establishment of the center. Yet, the university denied the Gallegly's access to the Center and, in addition has reneged on their commitment to hire an accountant to perform a forensic audit of over \$1 million dollars in funds raised.

The California Attorney General has received complaints from donors about Cal Lutheran's lack of fiscal transparency and the school owes it to the donor class and community members to fully establish the center and make known how their money is being spent.

Mike Bradbury, former Ventura County District Attorney

On Nov 19, 2021 at 1:53 PM, Michael Bradbury <mbradbury55@gmail.com> wrote:

Hi Elton,

Sorry to have missed your call. Got your message and tried to call you back. I saw the article and thought it was pretty good since you never know how the Star will treat Republicans! I'm happy to sign a letter to the newspapers, including the LA Times, which my guess will find this matter of interest. I'm sorry to ask, but this is of sufficient importance that I need to do so: will you please have your lawyers prepare an initial draft for me to review and use? This is too important for me to try to do it on my own. Coming from a lawyer (who may still have some credibility in the county) this letter will need to be accurate and precise. I will smooth the edges and put my imprimatur on it. You (and they) will better know the tone required as well.

Warm regards and congratulations on your courage in this matter, but I've never known you to be weak of heart or retreat from a righteous cause.

Hi Janice, thanks for letting me use your email, I don't have E's. Warm regards and happy Thanksgiving!
Mike

EXHIBIT 12

Date: December 2021 and June 2023

Exhibit Name: Published Letters to the Editor Signed by Mike Bradbury

Opinion: California Lutheran must make good on its Gallegly Center commitment

IN THIS ARTICLE

Higher Education (<https://www.pacbiztimes.com/section/higher-education/>).

Topic

Guest commentary (<https://www.pacbiztimes.com/author/guest-commentary/>).

Author

GUEST COMMENTARY FRIDAY, DECEMBER 3RD, 2021

By Michael Bradbury

California Lutheran University should honor its commitment to former United States Congressman Elton Gallegly and fully establish the Gallegly Center for Public Service and Civic Engagement on its campus.

As a former CLU board member, and an active member of our community, I witnessed firsthand Congressman Gallegly's longstanding dedication to our country, community, the university, and the people of Ventura County. The Gallegly Center commitment, designed to focus on the importance of public service, is a concept that fits well with the overall mission of a university, especially CLU. The benefits of such a program, which incidentally include the on-going hands-on attention of one of Congress's longest-serving members, are immeasurable.

Before offering this column for publication, I wrote to the president of CLU expressing some of these concerns. I received neither a reply nor an acknowledgement. I would normally choose to address these matters in private and help the parties work toward a mutually agreeable resolution. I regret not having been afforded that opportunity.

At CLU's request, Elton and Janice Gallegly agreed to partner with the university to build the Gallegly Center, including a replica of the congressman's Washington, D.C. office; archive his historical documents and papers; and establish a speaker's forum to promote discussion of, and solutions to, our community's and nation's issues and concerns.

I am personally aware that the Galleglys have worked tirelessly to do everything asked of them by the university to assure the success of the project and secure the necessary funding for the center.

Unfortunately, despite this dedication, the university has added insult to injury by denying the Galleglys access to the center and reneging on its commitment to provide an outside forensic audit of the more than \$1 million raised to support the center.

This has, unfortunately, resulted in the need to turn to the legal system to achieve a just result. The matter has been referred to the courts, and the California attorney general, whose responsibilities include oversight of charitable fundraising, has received complaints from donors regarding CLU's lack

of fiscal transparency. This is unsettling under any circumstances, but when it involves an institution of higher learning with church affiliation, it raises additional concerns.

California Lutheran owes it to its donors, staff and students, and our Ventura County community, to both fully account for the donated funds and to fulfill its commitment to the Galleglys and the public to fully develop the Center for Public Service And Civic Engagement.

Michael Bradbury was Ventura County's district attorney from 1979 through 2003. He lives in Ojai.

December 09, 2021

Acorn

California Lutheran University should honor its commitment to former U.S. Congressman Elton Gallegly and fully establish the Gallegly Center for Public Service and Civic Engagement on its campus.

As a former CLU board member and an active member of our community, I witnessed firsthand Gallegly's long-standing dedication to our country, community, the university and the people of Ventura County.

The Gallegly Center commitment, designed to focus on the importance of public service, is a concept that fits well with the overall mission of a university, especially CLU. The benefits of such a program, which incidentally include the ongoing hands-on attention of one of Congress' longest serving members, are immeasurable.

Before penning this letter to our local newspaper, I wrote to the president of CLU expressing some of these concerns. I received neither a reply nor an acknowledgment.

I would normally choose to address these matters in private and help the parties work toward a mutually agreeable resolution. I regret not having been afforded that opportunity.

At CLU's request, Elton and Janice Gallegly agreed to partner with the university to build the Gallegly Center, including a replica of the congressman's Washington,

D.C., office; archive his historical documents and papers; and establish a speakers forum to promote discussion of, and finding solutions to, our communities' and nation's issues and concerns.

I'm personally aware that the Galleglys have worked tirelessly to do everything asked of them by the university to assure the success of the project and secure the necessary

funding for the center. Unfortunately, despite this dedication, the university has added insult to injury by denying the Galleglys access to the center and reneging on its commitment to provide an outside forensic audit of the over \$1 million raised to support the center.

CLU owes it to its donors, staff and students, and our Ventura County community to both fully account for the donated funds and to fulfill its commitment to the Galleglys and the public to fully develop the Center for Public Service and Civic Engagement.

Michael Bradbury

Ojai

*Bradbury served as Ventura County district
attorney from 1979 to 2003*

OPINION This piece expresses the views of its author(s), separate from those of this publication.

Letters to the editor: CLU wronged Gallegly

Ventura County Star

Published 12:00 p.m. PT June 4, 2023

CLU failed to keep its word

California Lutheran University recently released a news statement regarding the Elton and Janice Gallegly Center for Public Service and Civic Engagement. Not surprisingly, it neglected to mention the university's failure to preserve and promote the center as promised.

As a former CLU regent and friend of the Galleglys, I recall when CLU asked the Congressman for the gift of his historical records and papers. The center's goals, which revolved around the importance of integrity in public service, aligned seamlessly with the overall mission of CLU, making it an invaluable educational partnership and opportunity. The benefits, including the continuing involvement of one of Congress' most experienced members, cannot be overstated, especially when it comes to the important goal of preparing our young women and men to become tomorrow's leaders.

The university's unilateral decision to dismantle the center and its failure to uphold its end of the bargain has been understandably frustrating and demoralizing for the Galleglys, and others who supported the center. It has also resulted in unwanted litigation. CLU's actions have become almost punitive even to the point of denying the Galleglys access to the center.

Regrettably, the university has also dismantled the replica of the Gallegly Congressional office, caused the removal of President Reagan's name from the Reagan-Gallegly Scholarships, refused to digitize the Gallegly archives as promised, eliminated the distinguished speaker's forum, and declined to account for thousands of dollars in expenditures. Although this is not the time to examine questions about why the University made these decisions, one must wonder whether partisan politics has played a role.

The bottom line is that in order to regain its integrity in this matter, CLU must live up to its commitments; commitments to its students, its donors, the people of Ventura County, and, yes, the Gallegly's. It's called "keeping your word"

Michael D. Bradbury, Ojai

EXHIBIT 13

Date: December 31, 2021

Exhibit Name: Email shows J.&E Gallegly working with both
a former CLU executive and a former regent

Message

From: Stephen Wheatly [wheatly@callutheran.edu]
Sent: 12/31/2021 5:58:27 PM
To: Elton Gallegly [elton.w.gallegly@gmail.com]
Subject: Re: Please See Attached Letter from Russ Young
Attachments: Lori Varlotta Dec 31 2021.PDF; Untitled attachment 00004.htm

Great letter, has substance and impact. KEEP TURNING UP THE HEAT!!!!

Sent from my iPhone

On Dec 31, 2021, at 5:48 PM, Elton Gallegly<elton.w.gallegly@gmail.com> wrote:

Sent from my iPhone

Begin forwarded message:

From: Elton Gallegly <elton.w.gallegly@gmail.com>
Date: December 31, 2021 at 11:15:12 AM PST
To: "Welsh, John J." <JWelsh@bwslaw.com>, "Slyngstad, Charles E." <CSlyngstad@bwslaw.com>
Subject: Fwd: Please See Attached Letter from Russ Young

John and Charlie

Russ gave us permission to share the following with you. Both Bill and Jon are on the CLU Regents Board with Bill being the Chairman.

Excellent letter.

Elton and Janice

Begin forwarded message:

From: Russell Young <russyoung444@gmail.com>
Subject: Fwd: Please See Attached Letter from Russ Young
Date: December 31, 2021 at 9:14:19 AM PST
To: Elton Gallegly <elton.w.gallegly@grnail.com>, Janice Gallegly <janicegallegly@grnail.com>, Joanie Young <joan.young@sothebyshornes.com>

Dear Elton, Janice and Joanie,

I believe I can be the most helpful to the situation by communicating directly to Lori Varlotta, Bill Camarillo and Jon Irwin. I just did that, believing that all three recipients of my letter represent my target audience. Kindly keep this communication private as I didn't draft it to be a shared or public communication. Linda and I send our love and best wishes to all of you (and to Richard too). Let's hope some reasoned thinking takes place on campus in the coming year.

Warmly,

Russ (and Linda)

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

From: Russell Young <russsyoung444@gmail.com>
Date: Fri, Dec 31, 2021 at 9:06 AM
Subject: Please See Attached Letter from Russ Young
To: Lori Varlotta <varlotta@callutheran.edu>, Bill Camarillo <bcamarillo@agromin.com>, Jon Irwin <jon.m.irwin@gmail.com>

Dear Lori,

Please see my attached letter.

Russ

cc Bill Camarillo Jon Irwin

EXHIBIT 14

Date: December 2021- early January 2022

Exhibit Name: Gallegly and Associates email series re: “The Plan” to damage President Varlotta’s Inauguration and her relationship with the Board

From: Administrator Sleeping Giant [admin@sleepinggiantfilms.org]
Sent: 1/3/2022 7:02:51 PM
To: Janice Gallegly Uanicegallegly@gmail.com]; elton.w.gallegly@gmail.com
CC: drkevinmcnamee@protonmail.com
Subject: Re: Letters of support - Gallegly Center at Cal Lutheran
Attachments: CLU Example.Jpg; Varlotta 1-3-22.jpg

Dear Janice and Elton,

The plan is in place. There are 28 regents and 7 letter writers; each writer has committed to sending a copy of his/her letter to 4 of the regents. That way, all regents will receive something while making the task manageable for each writer. I encouraged everyone to include a handwritten note, providing the attached .jpg as an example. In case some people want to include a more formal introduction letter I gave them that choice as well.

I also typed up a letter to Dr. Varlotta, which is attached here. My 5 envelopes are going out tomorrow and everyone has agreed to get theirs done within a week.

Best,
David Shechter

From: Janice Gallegly <janicegallegly@gmail.com>
Sent: Friday, December 31, 2021 11:56 AM
To: Administrator Sleeping Giant <admin@sleepinggiantfilms.org>
Subject: Re: Letters of support - Gallegly Center at Cal Lutheran

David

You and Kevin are a Godsend to us.

Thank you so much! Looking forward to seeing your next plan of action!!!

Please send our appreciation to Kevin!

Janice and Elton

Sent from my

iPhone

On Dec 31, 2021, at 11:38 AM, Administrator Sleeping Giant <admin@sleepinggiantfilms.org> wrote

Dear Elton,

Yes, I saw the letters - they actually published not two but three of them; the third was from Margarita Assael. All three people wrote the letters themselves based upon talking points that I provided. It would be totally proper to thank them. Here are their email addresses:

Sophie Daniels: sophiemdanie1s1@gmail.com

Maureen Meyer: jmeyer.famllly@frontier.com Margarita

Assael: stoptheviolins28@yahoo.com

Three more are going In soon, in time for the January 6 Acorn.

I spoke with Kevin this morning. Our next step is to get letters in front of President Varlotta herself and the Board of Regents. I am working on that plan now.....stay tuned.

Best,

David Shechter

From: Elton Gallegly <janicegallegly@gmail.com>
Sent: Thursday, December 30, 2021 10:46 AM
To: Administrator Sleeping Giant <admfn@sleepinggiantfilms.org>
Subject: Re: -Letters of support - Gallegly Center at Cal Lutheran

Hi David

I don't know if you have seen the Acorn yet today - but they published two of the letters - and they are fantastic Letters. I don't know who composed them but they are the best I have seen from anyone!!!
Sophie Daniels and Maureen Meyer.

There are no words to thank you enough - this sure lifts our spirits and we are deeply grateful. If it is proper and they sent the letters themselves, please get me their contact information so we can send a thank you note.
Janice and Elton

On Dec 28, 2021, at 11:52 AM, Administrator Sleeping Giant <admin@slccpinggiantfilms.org> wrote:

Hello Mr. Gallegly,

I wanted to introduce myself- my name is David Shechter and I live in Newbury Park, employed at Amgen. am the administrator for the Sleeping Giant of Thousand Oaks and was referred to you by Kevin McNamee, Thousand Oaks city councilman. We were dismayed to hear about the decision that Cal Lutheran is making about the Gallegly Center and have mobilized letters of support to the Acorn. Four (4) of these letters went in to the Acorn last weekend and 3 more are being submitted this week. I have assembled those letters in the attachment.

It is a pleasure and privilege to meet you. Thank you for your decades of service to our county and communities.

Best,

David Shechter, Ph.D.
Administrator, Sleeping Giant of Thousand Oaks
<Letters to Acorn Gallegly Center 12-28-21.docx>

Submitted prior to deadline for December 30 Acorn

1. From Jim Meyer

In regards to the article, "President pushes back against congressman". The antagonist in this story is CLU President Varlotta not Congressman Gallegly. The headline makes it sound like Congressman Gallegly is the one who reneged on his promises. Instead it is the CLU President Varlotta who is unilaterally making the decision even though she "gave the decision to the professional archivists." Which 'professional archivists' would recommend that the best manner to make material available to students, scholars and professors would be to keep them in their cardboard boxes rather than digitizing them? This is such an unbecoming tactic by President Varlotta to shift the responsibility for her own decisions unto (oh my gosh) "The Professionals"! It seems that if Congressman Gallegly and his wife donated the money to CLU for digitizing the records and establishing the Center for Public Service and Civic Engagement, then they have a right to ask for an accounting.

By not digitizing the materials makes them only available to someone who can physically make it to the CLU Library. I hope that President Varlotta would reconsider her decisions. If not, her decisions will create poor feelings among those of who reside in this community and know what Congressman Gallegly did for our community, as well as CLU, in his 26 years of representing us. The actions of this president should be a wake up call to anyone who would potentially want to donate to Cal Lutheran University.

2. From Vadim Manzhos

The article in the Acorn about "President pushes back against congressman" (December 16) is a slap in the face to former congressman Elton Gallegly, who has done so much for our community and for CLU. How can CLU go back on a contract signed by the previous CLU president? The CLU's current president said that the decision to do away with the replica of Gallegly's former office in the capitol was made "in the best interest of our students, our faculty, and of our academic community." How exactly is that? What a bunch of nonsense from someone who is intelligent enough to be a university president. CLU certainly welcomed the funding from Mr. Gallegly for the Center for Public Service and Civic Engagement, which has done a lot of good for the university and its students. Now, CLU is saying "Elton, you are no longer welcome but we will keep the money. Thank you very much." What's worse is president Varlotta's saying that the agreement says only that CLU must store the former congressman's furniture in the library and makes no mention of a replica office. What is CLU going to do, put the furniture in a closet? Talk about playing with the meaning of words. CLU needs to be a good example to the students and honor its agreements. Leave the replica office alone.

3. From Sophie Daniels

Are history and memory no longer important? Are agreements and generosity meaningless nowadays? The story from December 16 about CLU's President Varlotta pushing back against Congressman Gallegly makes this seem the case. Gallegly's donations helped fund and support programs and tuition for the students of the university, and now because of supposed "space" issues she wants to dismantle the replica office. This is a nonsensical reason that disguises the true motive at hand- canceling the congressman by removing the history of him from the campus. Surely in this technological age the archives can be digitalized, better yet,

himself that he'd raise money to do so - problem solved. Now Varlotta can work on the real problem at hand: learning to stand up to Woke culture.

4. From Margarita Assael:

The replica office of a congressman, who did much for our county, to be dismantled for the students "welfare?" And this space to be used to store box cartons? Donors gave to have these files digitalized and the President of CLU will not disclose where this money went. Are you kidding me? Mr. Gallegly donated money for the Center of Public Service and a contract was made between CLU and himself. In my opinion, Mr. Gallegly's political leanings are the basis for this attack. The CLU President, by not upholding the honor and respect for the contract between CLU and Mr. Gallegly, is not an example of moral righteousness for the students. Keep the office of Congressman Gallegly, as originally agreed to, and not a place to throw boxes.

To be submitted prior to deadline for January 6 Acorn

5. From author TBD:

The decision by CLU to do away with the replica of Elton Gallegly's office is disturbing, and not only because it's a breach of contract. It shows disrespect to our former congressman, who contributed to CLU and his district in so many ways.

I also don't think that the reason the CLU

president gave made much sense. How will anyone beyond CLU be able to review the records and documents if they aren't digitized? Why not leave the replica as is, which is what Gallegly and the former CLU president agreed on, and digitize the documents? That is the solution that makes the most sense. I have a feeling there is a backstory to this that we don't know about. Is it because the former congressman is a republican? We don't know, but the CLU president hasn't given any logical reasons for her unfair decision. I really think that Elton Gallegly deserves our support and I would strongly encourage CLU to reconsider its decision.

6. From David Shechter:

People have short attention spans these days. The Acorn and CLU both seem quite aware of that, because the December 16 article on CLU's decision to dismantle the replica of Elton Gallegly's office insults the intelligence of anyone who actually read it. First, the title is "President pushes back against congressman." Evidently the Acorn wants to give its readers the impression that Gallegly is "pushing" against CLU for something he is not entitled to, knowing full well that many people read no more than the headline and that no one likes pushy people. Yet, contract disputes happen all the time, with both parties advocating for their interests. Mr. Gallegly is not "pushing" on anyone. Second, the former congressman justifiably asked CLU to show how it spent the 1 million dollars that he and his wife donated to the Gallegly Center. The CLU president, Lori Varlotta, refused his request, stating "The records the university has with donors are between the university and the donors." Is she for real? Mr.

Gallegly himself is the donor in this case, and the Acorn should be embarrassed to report that non-sequitur as if it makes sense. Finally, Varlotta stated that she asked professional archivists: 'What is the best way to get this archived and make it available in the near future for student and faculty scholarship?' She and/or the Acorn expect us to believe that the archivists' response gave rise to the university's decision to keep the records and documents in cartons. In this digital age, no rational person believes that the best way to make documents accessible is to keep them in cartons rather than digitize them. CLU's decision to dismantle the office replica of the former congressman, who has done so much for our community over the years, is disgraceful, and the Acorn's reporting on the matter is even worse.

7. From Barbara Sponsler:

The story in the December 16 Acorn about CLU's decision to remove the replica of former congressman Elton Gallegly's office is suspicious. The CLU president's reason for breaking the university's contract with Mr. Gallegly was vague, and didn't really say anything at all. Of course the university is going to say it makes decisions in the best interests of the students and faculty. But how exactly will that decision be beneficial? It doesn't benefit anyone to keep 500+ cartons of documents stashed away where no one can get to the documents. In today's world everything is digitized. Varlotta's claim that they are keeping the furniture but dismantling the replica also makes no sense - what good does the furniture do anyone if it's hidden where no one can see it? I smell a rat. I can't help wonder if it has something to do with the fact that Gallegly is a republican and that offends the university's woke sensibilities. Maybe I am wrong. But CLU owes a better explanation to the community and to Mr. Gallegly, an accomplished public servant who deserves much better.

EXHIBIT 15

Date: February 2022

Exhibit Name: Email series with J. Gallegly drafting letter templates for David Shechter and Kevin McNamee to review and revise

From: Janice Gallegly <janicegallegly@gmail.com>
Sent: 2/10/2022 12:08:56 PM
To: Administrator Sleeping Giant <admin@sleepinggiantfilms.org>
Cc: drkevinmcnamee@protonmail.com; elton Gallegly [elton.w.gallegly@gmail.com]
Subject: Gallegly Center

Good morning David

Elton asked me to check with you to see if it is possible for you to send us copies of the letters that that were sent to the Bd of R for our files and wondered if anyone received a response.

In addition, I don't know if any additional letters have been sent but, as I remember, the plan was to send them to the Star. The Star hasn't printed very many letters about the Gallegly Center and I know there are a few out there. If you have sent some to the Star that have not been printed, perhaps you could ask the writer to send it to the Acorn. Another good avenue for letters is the Pacific Coast Business Times (email for letters hdubroff@pacbiztimes.com). They seem to reach a good deal of business people.

Also, below are a couple of suggested letters to write. They aren't the best but could probably be effective with some slight modification. If you would take a look at them and see what you think and if you have anyone that would sign them, we would appreciate it.

Letter 1

Dear Editor

As a donor who helped to establish the Elton Gallegly Center for Public Service and Civic Engagement at Cal Lutheran University, I have read with great dismay about the recent actions by Cal Lutheran which have harmed the Center. The University has dismantled the replica office which donors funded and has failed to digitally preserve the records of Congressman Gallegly in accordance with their commitment.

Cal Lutheran has refused to perform an audit of the funds that were raised. It is well past time for Cal Lutheran to make a transparent and public accounting of what they have done with the money donated for the Center.

Full Name

Full Street

Address

Email

Letter 2

Dear Editor

Congressman Gallegly raised over \$1 million dollars based on the commitment from CLU to preserve and make available his records on-line. Nearen years is more than enough time to accomplish this project.

Sadly, Cal Lutheran University appears to have suckered former Congressman Elton Gallegly into donating his records to the University by promising they would be digitally archived and made readily available to scholars, students and the public on the internet. That agreement was made in 2013, and as of today those records have not been digitally archived. Instead, the University chose to have the papers cataloged and left in boxes

limiting access to researchers who can go to the library. The University is actively seeking to erase the presence of the Gallegly Center from the University, and the University refuses to provide a public accounting of the funds collected from Gallegly's donors.

Full Name

Full Street

Address

Email

David, We truly appreciate yours and Kevin's time in helping us. If you have any other ideas and need anything from us, please let me know. We need to keep the fires burning under their feet. President Varlotta's 3 day inauguration starts February 22. BTW, when Kevin met with us a few weeks ago, Elton mentioned he would like to meet you as well. Elton's cell is 805-501-5400.

Thank you,
Janice and Elton

EXHIBIT 16

Date: January 18-20, 2022

Exhibit Name: Email chain the includes J.&E Gallegly, David Shechter, and PR consultant Eric Rose working directly with VC Star reporter, Mike Harris to get story published

From: Eric Rose [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RE CIPIENTS/CN =58B14FC1FB3A4228B2D80D70AFDEA454-ERIC]
Sent: 1/18/2022 9:19:25 AM
To: Harris, Mike [Mike.Harris@vcstar.com]
Subject: RE: CLU's Removes Exact Replica of Congressman Elton Gallegly's D.C. Office
Attachments: -1055111958686379103.jpg

You can attribute the quotes to me as the spokesperson for Gallegly's. We don't know the exact date the replica office was removed; we learned about the dismantling this weekend.

The before photo came from Congressman Gallegly. The image of the dismantled office was provided to me by a source at the university who wants to remain anonymous and provided it to me. The only other photo I have (see attached) is also low quality and not great.

From: Harris, Mike <Mike.Harris@vcstar.com>
Sent: Tuesday, January 18, 2022 8:54 AM
To: Eric Rose <eric@ekapr.com>
Subject: Re: CLU's Removes Exact Replica of Congressman Elton Gallegly's D.C. Office

Now *this* is worth a story.

ON the record, when was the office removed? I need to attribute the statements in the release to someone. You?

Who took the photos? I need to attribute the photo to someone.

Thanks.

Mike

Mike Harris Staff Writer

Ventura County Star
805-437-0323

Mike.Harris@VCStar.com www.VCStar.com

From: Eric Rose <eric@ekapr.com>
Sent: Tuesday, January 18, 2022 8:45 AM
To: Harris, Mike <Mike.Harris@vcstar.com>
Subject: CLU's Removes Exact Replica of Congressman Elton Gallegly's D.C. Office

Statement on Cal Lutheran University's Removal of Exact Replica of Congressman Elton Gallegly's D.C. Office

Thousand Oaks, January 18, 2022 - The decision by Cal Lutheran President Lori Varlotta to remove an exact replica of Congressman Elton Gallegly's office at Cal Lutheran while litigation on this very issue is pending in court is unacceptable. This move is yet the latest violation of the 2013 agreement between Cal Lutheran and the Congressman to establish the Gallegly Center at the University that

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included an exact working replica of his D.C. Congressional Office and the digital archiving of his congressional records.

Cal Lutheran has refused to digitize the archives after approval by the University to sign the contract with Heritage Werks to digitally archive 26 years of his congressional records and make them available on the internet in accordance with the agreement.

This latest offensive move by President Varlotta to unilaterally dismantle the replica office that was designated the "HUB" of the Gallegly Center by the former President is certainly not in keeping with the morals and character of this faith-based University.

Editor's Note: On November 15, former Congressman Gallegly filed a 66-page lawsuit in Ventura County Superior Court for breach of contract for Cal Lutheran failing to fully establish the Elton and Janice Gallegly Center For Public Service and Civic Engagement. The former Congressman and his wife raised more than \$1 million for the center. Congressman Gallegly represented parts of Ventura County in the House of Representatives from 1987 through 2012.

A before and after photo of the dismantled office is attached.

Media Contact: Eric W. Rose (805) 624-0572 or eric@ekapr.com

Re: Gallegly asks question - VC Star 1-19-22

Janice Gallegly <janicegallegly@gmail.com>

Thu 1/20/2022 11:30 AM

To: Administrator Sleeping Giant <admin@sleepinggiantfilms.org>

Hi David

Thank you for your email and empathy for us this morning. We are blessed to have friends and supporters, such as you and Kevin. Eric Rose, who is also helping us has written a couple of letters - one for the Star and one for the Acorn.

I don't know if you have additional members that would sign these letters for us, but if you do, I will ask Eric to forward them to you. Please let me now.

Thank you

Janice

On Jan 20, 2022, at 8:51 AM, Administrator Sleeping Giant <admin@sleepinggiantfilms.org> wrote:

Thank you, Janice. I was up very early this morning and read the Acorn article in dismay.

In addition to the letters in the Acorn, I do know that all 28 regents have received at least 2 different letters from members of the Sleeping Giant in which we have expressed opposition to the decision. I am monitoring the Ventura County Star to see if they will print anything we've sent them. I am also in consultation with Kevin about potential next steps, and welcome any ideas that you may have.

I can't imagine how frustrating this must be. Please know, however, that we are all outraged at what is happening and support you 100%. I am also sensing a sea change in our country, when "the masses" are waking up to the broader corruption and moral corrosion in our government and universities. I am confident that we still stay the course.

Best,

David Shechter

From: Janice Gallegly <janicegallegly@gmail.com>
Sent: Wednesday, January 19, 2022 4:41 PM
To: Administrator Sleeping Giant <admin@sleepinggiantfilms.org>
Subject: Fwd: Gallegly sends copy - VC Star 1-19-22

Hi David

We wanted to make sure you are up to speed in the recent moves by CLU.

We just found out that the President took it upon herself to remove the Gallegly Center Congressional Office Sunday. We and our attorneys feel her move will not look favorable to the Judge when our complaint has been delayed due to the fact the courts have been closed due to Covid. Attached is the article that appeared in the Star on-line version, the story in today's paper, however, does not have the pictures. The Acorn will also be running a story this week and we are in hopes their comments will be more favorable to us.

Background which you probably already know is below:

It was CLU that came to us in 2012 and wanted Elton's documents and papers to archive and committed in writing to have them digitized. In addition, it was CLU's concept to have an exact replica of Elton's DC office and the Vice President of Advancement came to DC to measure and take pictures. CLU chose the location for the Center to be built which was an atrium outside of the Library. The Congressional Office was to be the HUB of the Gallegly Center and was designed specifically in accordance with their plans. Construction of the Gallegly Center and replica Congressional Office was approved 3 times by the CLU. We raised all of the money for construction of the Center. It was never meant to be a temporary display that could be removed by CLU at their will.

We truly appreciate your efforts in writing letters to the editor and to the President and Board of Regents.

Thank you for your continued support.
Janice and Elton

Begin forwarded message:

From: Eric Rose <eric@ekapr.com>

Subject: Privileged and Confidential/Attorney-Client Communication - VC Star Date:

January 19, 2022 at 8:03:18 AM PST

To: "John J. Welsh" <jwelsh@bwsllaw.com>, "Charles E. Slyngstad" <cslyngstad@bwsllaw.com>, "Elton Gallegly" <elton.w.gallegly@gmail.com>, Janice Gallegly <janicegallegly@gmail.com>, "Mike Sedell" <mjsedell@yahoo.com>, Doug Rose <dougrose707@gmail.com>

Privileged and Confidential/Attorney-Client Communication

California Lutheran University removes former Rep. Gallegly's replica office

<https://www.vcstar.com/story/news/local/communities/conejo-valley/2022/01/18/former-republican-congress-rep-galleglys-replica-office-taken-down-california-lutheran-university/6565469001/>

<image001.png>

By Mike Harris

California Lutheran University has removed the replica Washington, D.C., office of former Rep. Elton Gallegly in a dispute he has taken to court.

The school had long said it planned to take down the office, which had been on display for the past 3½ years, to make room for Gallegly's archives.

"We are pleased that the arranged, preserved, and cataloged collection will soon be made available to scholars and students to pursue the type of research activities the center was meant to fuel," university spokeswoman Karin Grennan said Tuesday.

She said items from the office will be stored at the school but will not be available for viewing.

Gallegly, a Simi Valley Republican who served in Congress from 1987 through 2013, said he didn't know exactly when the replica office was removed. He said he believed it was in the last seven to 10 days

"I'm very disappointed in the lack of professionalism and fairness of what she (Lori Varlotta, the university's president) has done, while litigation is pending," Gallegly said Tuesday. "I would have thought she would at least have the courtesy of letting the judge make the decision."

The office was the centerpiece of the Gallegly Center for Public Service and Civic Engagement, named after the former congressman and his wife, Janice, in the Pearson Library on the school's Thousand Oaks campus.

But Varlotta said it was never much of a draw.

Gallegly sued the university in November in Ventura County Superior Court, alleging the school breached its contract to fully establish his namesake center.

The lawsuit also argues the university violated an obligation to maintain the replica office.

Varlotta, however, said the office was displayed at the school's discretion. She and the university's former president, Chris Kimball, are also named as defendants in the suit.

The university asked the court in December to dismiss the lawsuit, arguing the school has met its obligations for the Gallegly Center, which opened in May 2018.

A court hearing had been scheduled for Jan. 26 but has been [delayed because of the COVID-19 surge](#). Little interest: [CLU president says Gallegly's replica office at school not much of a draw](#)

Insufficient facts?: [Cal Lutheran asks for dismissal of ex-congressman's lawsuit](#)

Mike Harris covers the East County cities of Moorpark, Simi Valley and Thousand Oaks, as well as transportation countywide. You can contact him at mike.harris@vcstar.com or 805-437-0323

Eric W. Rose
Partner
eric@ekapr.co
m Office:
213.741.1500
x525
Cell: 805.624.0572
801 S. Figueroa
Street, Suite
1050 Los
Angeles, CA
90017
www.ekapr.com

EXHIBIT 17

Date: February 7-11, 2022
Exhibit Name: Email series that shows J.&E Gallegly working with J. Lacey to damage the inauguration and create a buzz before the trail.

From: James Lacey [James@healthyventures.com]
Sent: 2/11/2022 12:12:32 PM
To: Elton Gallegly [elton.w.gallegly@gmail.com]
Subject: Re: Song. Office before Dismantled Gallegly Congressional Office

Hi will call you today.

Get [Outlook for iOS](#)

From: Elton Gallegly <elton.w.gallegly@gmail.com>
Sent: Friday, February 11, 2022 8:57:59 AM
To: James Lacey <james@healthyventures.com>
Subject: Re: Song. Office before Dismantled Gallegly Congressional Office

Jim
I'm happy to talk with you about
planning issue . Much easier to talk
than type

Sent from my iPhone

On Feb 11, 2022, at 8:56 AM, Elton Gallegly <elton.w.gallegly@gmail.com> wrote:

Jim
Just finished update from Council and will share a
thought with you Thanks, Elton

Sent from my iPhone

On Feb 10, 2022, at 2:00 PM, James Lacey <james@healthyventures.com> wrote:

Hi yes was going too as I indicated. I just saw Joanie so she can see it as well. t,

Get [Outlook for iOS](#)

From: Janice Gallegly <janicegallegly@gmail.com>
Sent: Thursday, February 10, 2022 12:29:51 PM
To: James Lacey <james@healthyventures.com>
Cc: elton Gallegly <elton.w.gallegly@gmail.com>
Subject: Re: Song. Office before Dismantled Gallegly Congressional Office

James
After you receive your attorneys approval of your letter, you need to talk to Elton before
executing your plan as the attorneys are working on strategy.
Janice

On Feb 8, 2022, at 2:03 PM, James Lacey <james@healthyventures.com> wrote:

Thanks Janice, the letter is in full gear (My Lawyer is reviewing because I must be careful with me being in
business) it will be hard hitting. The plan is to drop this to the press right before her big deal on campus on
2-22. The distribution will include Wall Street Journal, Tucker Carlson, who is hitting the Woke School issue,
Scholl board of regions, the Star, All the Acorn's, Pacific Business Times, Epoch Times, The Gaudian, LA Times,

KNX Radio, Hannity, Fox News, HLM TV, PR Wire, CA Republican Members of Congress and Senate, Eric Early- currently running for AG of CA, CA Republican HDQ, among others. Copies will be displayed on school site, dorms, among other areas.

This goal here is for the buzz to be in full gear before your trial date and it will create some big noise, major distraction for the Presidents event and take away from her event where media will be present. If lucky, she will be answering questions and the press will bring this up as negative that many of the media outlets may bring lite too and have it published a few days before the trial date. Regarding Fox, they may send in Channel 11 Fox LA, and many time tucker or other hosts will report through their reporter on site at the event. One way or another this is the strategy. If you have any others you want this to go to, let me know and we will make it happen.

Janice, you looked great last night, lots of color in your face and you were happy.

By the way, I spoke to Elton about this last night. Do you know the City Planner in Simi Valley? I am helping a friend who has approval from the schools, the environmental groups, the water company, and the county to add a 740 square foot extra stand alone one level home for renters or a small family. It looks top notch, matches her home, she is in the gated community of 15 homes and the two houses across the street are all on board with her position. The HOA has told Sandie that she can't build and that they will fight to assure no one builds in their HOA community.

The new state law along with the City of Simi Valley support the new law because of the shortage of housing. The new addition isn't for homeless but respected people. The HOA Board has letters to members saying homeless is going into the home.

Are there contacts we should go to in the city to help with this, especially if everyone has approved and the HOA is the only one in the way of this addition being added.

Thanks so much,

James P. Lacey

CEO/Managing Partner Berry
Naturals, Inc.
780 Lakefield Rd Unit G
Westlake Village, CA 91361
Work: 805.409.9004
Cell: 805.390.6274
Powered By:
<image001.jpg>

From: Janice Gallegly <janicegallegly@gmail.com>
Sent: Tuesday, February 8, 2022 1:11PM
To: James Lacey <james@healthyventures.com>
Subject: Re: Song. Office before Dismantled Gallegly Congressional Office

James –

I dont know if you have the before picture - but here is one.

On Feb 7, 2022, at 12:28 PM, Janice Gallegly <janicegallegly@gmail.com> wrote:

James

Elton had asked me sometime back to send a picture of the dismantled office to you. Sorry for the delay. Janice<Replica view of Dismantled office JPEG.jpg

EXHIBIT 18

Date: October 13, 2022 and October 18, 2022

Exhibit Name: Excerpts from E. and J. Gallegly's sworn depositions

When asked by the defendants' attorneys what types of personal donations were made by the Gallegly's themselves (not from the Gallegly for Congress Fund) here are the verbatim exchanges that are part of the sworn depositions

Excerpt 1 comes From E. Gallegly's deposition on October 13, 2022 (pp 159-161).

Q. [t]he question is: "Identify every donation you made to the Defendant Cal Lutheran University from moneys not held by the committee, Gallegly for Congress."

So ostensibly this would include donations that you made or Ms. Gallegly made. As I read your response, starting at line 25 and continuing to page 12, to be nice to you, though. But it -- he doesn't answer your question.

BY MR. BURRIS:

Q. Yeah. I will smile and nod and not answer and go to the next question. The response to the supplemental -- the supplemental special interrogatories. And I -- I didn't mark the exhibit on my piece of paper, but I think it's Exhibit 6.

MR. SLYNGSTAD: That's -- that's part of it right there.

THE WITNESS: Uh-huh. Okay.

Maybe it's in the next page. Bottom 8. it says that you provided a desk chair -- or I'm sorry -- a desk, chair, pictures, plaques, and other office memorabilia subject to a loan.

A. Uh-huh.

Q. That you purchased -- you personally purchased your desk from the GSA. That you donated the papers and the archival legislative collection to Cal Lutheran in 2017. And that you hosted numerous dinners and meetings at your home and provided food and drink to prospective donors. I don't want to rush through it, so take --

A. Yeah, there's a list of the names on there.

Q. Uh-huh.

A. Those are all accurate. What's your question?

Q. So my question is: When we looked at the request for admissions and said admit that it was -- that all the money came from the committee, Gallegly for Congress, you -- you said denied. But when we look at this answer, I'm looking for some money that went from your hands to Cal Lutheran's hands, and I don't see any referenced.

A. I don't know the answer to that question. I know we brought in a

lot of money. I don't know whether it's mine or -- I know I brought i I know I brought in a lot of checks from people that we went to.

Excerpt 2 comes From J. Gallegly's deposition on October 18, 2022

During Ms. Gallegly's sworn deposition, she, too, is asked about the personal donations that she and/or her husband made to California Lutheran or the Gallegly Center. Here is a response she provides on page 207 of her testimony.

Well, the -- the Gallegly for Congress funds fall under FEC, and it's a charitable organization; but it's the Gallegly for Congress that gave that money.

When we had dinners in our home and paid for them, lots of times it was our money.