# **CSUCI Whistleblower**

The following is detailed information from Terri Mansour, a whistleblower and former California State University Channel Islands (CSUCI) library employee, whose civil rights have been systematically violated by the institution and their ongoing efforts to obstruct justice.

The summary includes links to extensive supporting documentation including email correspondences from CSU Executive Vice Chancellor and General Counsel, G. Andrew Jones, CSUCI Chief of Police, Drake Massey, and Angela Portillo from CSUCI Human Resources.

Mansour blew the whistle on discriminatory practices and misconduct at CSUCI, and what followed was a series of retaliatory actions, harassment, and ultimately constructive wrongful termination for requesting police reports that document her as a mentioned party. Despite CSUCI Police Department's own policy to produce these reports within 10 days, she has been waiting over 5 years! CSUCI Police Records and Report Request

Janet Pinkley, who is white, and worked with Mansour in the library, made an overtly racist comment to Mansour saying, "you need to know your place." The incident was reported to Laurie Nichols, then Director of Human Resources, that Mansour took offense to the comment being an African American woman and the retaliation began.

Pinkley's personal bias towards Mansour escalated to the level where she made multiple complaints to CSUCI campus police against Mansour, who was on medical leave for over 2 months during that time. Pinkley's false complaint was serious enough to be escalated to CSU's threat management unit. Pinkley is nearly a foot taller than Mansour and twice her weight. Mansour had ZERO contact or interaction, yet library employees felt threatened when information about Mansour's mental health information was disclosed, further exacerbating the stigma and hostile work environment.

When Mansour was made aware that library staff reported complaints to campus police, she requested copies of the reports. Laurie Nichols responded with an immediate suspension of Mansour the moment she returned to work from medical leave without due process. When Mansour appealed the suspension, CSU threatened her with a dismissal unless she signed a settlement agreement.

Mansour recently located the incident numbers for the requested police reports on a public website <u>CSU Channel Islands CrimeGraphics</u> yet CSUCI Police continue to withhold these records. Despite numerous requests for police reports and related documents regarding incidents from June 1, 2019, through August 31, 2019, CSU has withheld this critical information. CSU has falsely stated that only 170 reports exist for the relevant period, while publicly accessible data from CSUCI's own website reveals that 660 incidents occurred from June 1-30, 2019 (188), July 1-31, 2019 (263) August 1-31, 2019 (209).

In addition to withholding reports and falsifying documents, CSU has submitted false declarations under oath. Specifically, CSUCI's Chief of Police Drake Massey, provided a false declaration claiming that "I personally have *never* authored, generated, or contributed to any police report regarding Terri Mansour and any incident in June 2019."

However, <u>Massey's June 19, 2019</u> email regarding Terri Mansour clearly contradicts <u>Massey's sworn declaration dated July 10, 2023</u>. The incident number in reference to the June 19, 2019 email is 1906180021.

The information from incident number 1906180021 will confirm that Massey was the officer on call and submitted a report. The complaint by Pinkley was so egregious that it was escalated to the Threat Management Unit with Officer Greg Reynolds and that incident number is 1906280019 and referenced as a follow up to the June 18, 2019 complaint. Here is the email from Reynold's regarding the Threat Management Unit complaint and interviewing witnesses.

Axon Enterprises, is the third party that provides technical support for the Records Information Management System RIMS the campus police use for their reports.

Axon affirmed that in order to view all records an administrator with full access is required.

Axon support verifies the information CSU had sworn under oath as a spreadsheet of their reporting system, not something that outputs directly from evidence.com's web interface.

CSUCI Police Falsified Spreadsheet and Sample Data Output

CSUCI Police Transparency June 2019 (188 Incidents)

CSUCI Police Transparence July 2019 (263 Incidents)

CSUCI Police Transparency August 2019 (209 Incidents).

Michael Morris, then Chief of Police, provided a police escort for Pinkley for protection against me after I filed a restraining order against Pinkley. The incident number is <u>1908280042</u> and the first sentence of the corresponding email from Morris states, <u>"FYI this is the situation involving Terri Mansour."</u>

CSUCI Police did not expect Mansour to find the incident numbers referencing the reports. In spite of this, they continue to lie and withhold the reports that are unfavorable to CSU. This false testimony constitutes an obstruction of justice and civil rights violation.

<u>Pinkley also accused Mansour of vandalizing her office door.</u> Mansour was on jury duty when the incident occurred, The police provided Mansour a copy of Pinkley's accusation of vandalism, however, they continue to withhold the reports where Pinkley defamed Mansour's character. It would stand to reason the police would document a complaint that was escalated to the threat management unit if they are going to complete a <u>report</u> on a door being scratched.

CSU Chancellor's Office Involvement

G. Andrew Jones, Executive Vice Chancellor and General Counsel for the California State University (CSU), email to Mansour, serves as evidence that Jones had specific knowledge about incidents involving CSUCI library staff and police actions. Several points indicate that Jones may have been aware of specific police reports:

- 1. **Direct Reference to Police Involvement**: Jones explicitly mentions that CSUCI employees "went to campus police to report that they felt threatened by you at work," confirming that there were formal reports made to CSUCI police. This statement acknowledges that a police record likely exists or should exist regarding these incidents.
- 2. **Details About Employee Complaints**: Jones explains that the complaints made by CSUCI staff, such as Janet Pinkley, were within the scope of their employment and justified CSU's provision of legal counsel. By discussing the CSU's justification for representing employees under the Government Code, Jones implies he is aware of documented complaints related to these incidents.
- 3. **Distance from CSUCI Campus**: The Office of General Counsel, where Jones is based, is approximately 70 miles from the CSUCI campus. For Jones to have this level of detailed knowledge about specific interactions involving police and staff complaints on a distant campus suggests that formal records, such as police reports, exist and were shared with or accessed by the Chancellor's Office.
- 4. **Jones's Position and Access to CSU Records**: As CSU's Executive Vice Chancellor and General Counsel, Jones likely has or could obtain access to official records, including police reports, especially for cases involving CSU's legal interests. His communication implies that he relied on documented information to support his assertions about the events at CSUCI.

On July 20, 2022, Jones wrote another email to Mansour. The outline of the response is as follows:

#### 1. Lack of Transparency in Addressing Known Reports

In his July 20, 2022 email, Jones states, "The campus has already responded that they have no additional documents to produce." However, evidence from CSU's internal database, as well as incident numbers obtained by Mansour, show that additional reports exist and are directly relevant to the claims of racial discrimination, retaliation, obstruction of justice, civil rights violations, and harassment against CSU.

By denying the existence of these records, Jones is misleading Mansour about the completeness of CSU's responses, creating an appearance of transparency while intentionally omitting critical information. Given that these reports have already been escalated to CSU's threat management unit, his statement suggests an intentional effort to withhold evidence.

#### 2. Dismissive Tone

Jones's language in the email lacks professionalism and respect for the gravity of Mansour's concerns. For instance, his response disregards the context of the requests by stating that she "contend[s]" the complaints were ignored, which implies doubt regarding Mansour's assertions. This tone minimizes the seriousness of the complaints and fails to acknowledge the harm caused by CSU's misconduct.

His statement "As to your questions regarding the process to have a campus police department investigated or oversight over that department, we cannot provide legal advice and suggest that

you consult with your own attorney" comes across as a curt dismissal rather than a genuine effort to address Mansour's concerns. The response could be seen as evasive, attempting to deflect responsibility rather than addressing legitimate issues raised by an affected party.

## 3. Obstruction of Justice by Misrepresenting Document Availability

Jones's role as General Counsel obligates him to uphold legal standards, including transparency in responding to requests for documents that may reveal evidence of discrimination or police misconduct. By asserting there are "no additional documents to produce," he is effectively obstructing justice by preventing the plaintiff from accessing information that supports her claims.

Mansour has recently identified specific incident numbers, which directly challenge Jones's statement about the unavailability of additional documents. Jones, who holds a significant position of authority, should ensure CSU's responses are accurate and complete. By knowingly denying access to critical records, he obstructs the plaintiff's ability to exercise her legal rights, contravening the principles of transparency that his office is expected to uphold.

## 4. Evasion of Accountability

As CSU's Executive Vice Chancellor and General Counsel, Jones is responsible for ensuring that CSU adheres to public records laws and policies. His refusal to directly address the requests or provide a detailed explanation for the withholding of documents signals a lack of accountability.

Instead of acknowledging the requests for reports from the CSUCI Police Department that Mansour is legally entitled to, Jones deflects responsibility, suggesting the plaintiff should "consult with [her] own attorney." This response evades CSU's responsibility to address the matter transparently and obstructs Mansour's access to evidence critical to her case.

#### 5. Undermining of CSU's Public Commitment to Fairness and Equity

CSU, as a public institution, has a duty to operate with transparency and integrity, especially when handling allegations involving racial discrimination and harassment. Jones's dismissive tone and misleading statements about the availability of records indicate a disregard for CSU's mission of upholding fairness and equity. His actions, therefore, undermine public trust in CSU and suggest a willingness to protect the institution at the expense of a fair legal process.

By obstructing access to the reports, Jones also contradicts CSU's stated values of transparency, accountability, and responsiveness, raising questions about CSU's commitment to addressing and correcting potential wrongdoing within its institution.

# 6. Implications of Jones's Role and Authority

Given his position as Executive Vice Chancellor and General Counsel, Jones holds a significant influence over CSU's legal approach and its responses to allegations of misconduct. His role

gives him access to the full scope of CSU's obligations under California law, and his actions carry weight not only legally but also institutionally.

Jones's email could suggest a broader institutional strategy of minimizing CSU's exposure to legal accountability. His attempt to silence or discourage whistleblowers by using his authority to stonewall document requests, impeding efforts to hold CSU accountable.

## 7. Perjury Concerns and the Duty to Avoid Misleading Statements

In the legal context, withholding information or providing incomplete responses to records requests could constitute perjury if knowingly false statements are made under oath or in formal declarations. While this email itself is not a sworn statement, it represents a position that could implicate CSU if it continues to claim the reports do not exist despite evidence to the contrary.

His refusal to acknowledge reports that are already documented on public databases, combined with the recent discovery of incident numbers, raises concerns about CSU's obligation to prevent perjury within its organization and ensure truthful communications, especially from its top legal representative.

Jones's email demonstrates an intentional lack of transparency, a dismissive attitude, and an obstruction of justice by withholding access to documents critical to Mansour's claims. His approach not only impedes her ability to seek justice but also reflects poorly on CSU's commitment to fairness, transparency, and accountability. As CSU's Executive Vice Chancellor and General Counsel, Jones's actions set a troubling precedent, signaling an institutional willingness to evade accountability and undermine Mansour's civil rights.

These elements strongly suggest that Jones was referencing specific police reports or documented complaints, raising questions about why CSU has been unwilling to produce these records in response to formal requests. The intentional withholding of these records indicate obstruction, especially given the detailed knowledge displayed in this email from the CSU Chancellor's Office.

#### CSUCI Human Resources Involvement

<u>A July 31, 2019 email from Angela Portillo</u>, then Employee Relations Manager in Human Resources at CSUCI, provides specific information regarding the report. The only way Portillo would be able to respond or reference information is with the actual report.

Here are multiple reasons why Portillo's response proves the existence of a report or formal documentation:

**Specific Language Referring to "Complaint" and "Findings"**: Portillo's response refers directly to the "complaint" and her own "findings" after investigating it. This language is characteristic of formal documentation and report handling, especially within Human Resources and law enforcement contexts. When someone conducts an investigation and makes findings, these typically result in a documented report.

**Reference to "Threat Assessment" by Campus Police**: Portillo describes a "threat assessment" conducted by CSUCI Police following the complaints. She explains that this is "a

term used by the police department" to evaluate potential risks. The structured nature of threat assessments generally involves official police reports to document actions taken, findings, and determinations. Such an assessment would likely involve formal documentation that the CSUCI Police Department should have on file.

**Details of Specific Interactions with Lt. Drake Massey**: Portillo's response states that she "met with Lt. Drake Massey" and "looked into additional information." This indicates collaboration with police personnel, which suggests that police records would exist regarding these interactions and the complaint. Given the specific involvement of police officers, any communications between HR and the police on a perceived safety threat would be documented.

Conclusive Statements on the Existence of Threats: Portillo notes that the reporting parties "did not use the term 'threat' when speaking with campus police" but felt "unsafe" due to "verbal aggressiveness" they perceived from Mansour. The careful language in this clarification implies formal language used in reports. In assessing the level of threat, CSUCI Police would reasonably need to document these statements, as they provide insight into both the nature of the concern and the police's response.

**WAVR-21 Risk Assessment Mention**: Portillo references the WAVR-21 protocol, a guideline often used by police and HR for evaluating workplace aggression risks. This guideline typically requires detailed record-keeping for liability and accuracy purposes. The mention of such a structured assessment tool implies the existence of a formal report that would contain these evaluations and responses.

**Implications of Non-Disclosure to Mansour**: Portillo's report lacks any mention of providing this information to Mansour directly, even though she is a mentioned party with a vested interest. In the context of HR and police procedures, documented communications and assessments that involve a concerned party are usually available to them, especially when such information directly impacts their employment or workplace environment.

**Ongoing HR Investigation and Privacy Review**: Portillo's email details an assessment of privacy concerns related to medical information. The reference to these internal findings implies that documentation must exist to substantiate Portillo's determinations on this sensitive matter.

**Precedent for Police Reports Documenting Workplace Safety**: Situations where employees report feeling unsafe due to a coworker's perceived actions almost universally result in documented police and HR reports. The structured process of determining that no explicit threat was identified would require documentation to protect the institution's legal interests.

Court Involvement and Lack of Accountability:

Despite the overwhelming evidence, including falsified documents and withheld reports, both Judge Mark Borrell and Judge Ronda McKaig have refused Mansour's request for CSUCI Police to conduct a proper, supervised search with an administrator having full access to the database. Instead of ensuring transparency, the court has chosen to ignore this critical evidence and impose fines against Mansour for seeking justice.

The judge's rendering a decision without reviewing these reports is a direct violation of Mansour's rights to a fair process. By refusing to compel CSU to produce the documents and evidence, the court is failing in its duty to ensure justice and is allowing CSUCI to continue suppressing the truth.

This mirrors a high-profile case in Ventura County—the Rodney King trial in 1992, which highlighted issues of King beaten by police. In the Rodney King case, police misconduct was minimized, and the public outrage only grew when the system failed to hold the officers accountable. Thirty years later, the Ventura County Court is once again enabling police to cover up wrongdoings without accountability.

#### Call to Action:

This case is about holding powerful institutions accountable for their actions and ensuring that justice is not denied to those who stand up against wrongdoing. The Ventura County Superior Court and CSU need to be transparent, and the reports must be disclosed. CSUCI Police vehemently object to a proper search.

Anyone would want full disclosure of police reports that mention them, particularly if those reports contain misleading, defaming or damaging information.

Thank you for taking the time to hear this case and take action to ensure this does not happen to anyone else. CSU needs to be held accountable for their egregious misconduct.

#CSUCI #BroomeLibrary #CSUCIEgregiousMisconduct #CI PoliceMisconduct #CSUCIConspiracy #CI PoliceChiefPerjury #CSUCIObstructionofJustice #CI PoliceProduceWithheldReports #CI PoliceAccountability #MentalHealthMatters #DisabilityBias #CI PoliceCoverUp #CSUCIWhistleblowerRetaliation #CSUCICorruption #EndtheStigmaofMentalHealth #SelfCareMatters #MentalHealthAdvocacy #PsychologicalWellbeing #AbusiveConduct #CalState #RodneyKing #VenturaCountySuperiorCourtBias #CSUCICivilRightsViolation #CSUCIScandal #CalStateConspiracy #CIWav #CalStateGAndrewJonesConspiracy

#CalStateGAndrewJonesCorruption #CSUCIConspiracy #CSUCIDiscrimination #CSUCIHarassment #CSUCIRetaliation #CalStateFishRotsFromtheHeadDown #CalStateAccountability #CalStateProducePoliceReports #ChronicleofHigherEducation #CSUCozenOConnorReports #YouNeedtoKnowYourPlace #CalStateCorruption #CalStateEgregiousMisconduct #CSUCIGaslighting #CSUCiHostileWorkEnvironment #CalStateCivilRightsViolation #CalStateLacksTransparency #CSUCIHostileWorkEnvironment #CSUCIRacismCoverUp #1906180021CSUCIPoliceWithholding #1906280019CSUCIPoliceWithholding #1907200040CSUCIPoliceWithholding #1908280042CSUCIPoliceWithholding