
Re: PERSONAL & CONFIDENTIAL//CMP373 Your Complaints related to UCLA PD

1 message

Chuck Harold <chuckharold@gmail.com>

Fri, Apr 17, 2026 at 3:03 PM

To: UCLA Compliance Office <compliance@compliance.ucla.edu>

Bcc: Silvia Harold <megmaxmom@gmail.com>, Megan Harold <meganharold2@gmail.com>, Max Harold <m.harold.0@outlook.com>, Max Harold <maxharold6@gmail.com>

TO: The UCLA Compliance Office, UCLA Wilshire Center, Suite 700, Los Angeles, CA 90024**RE:** Your Reference CMP373 — Three POST Complaints: PUBLIC-26-000212 / PUBLIC-26-000213 / PUBLIC-26-000214 — California Labor Code § 132(a) Crime Report Filed February 19, 2026 — Personnel File Records Request Outstanding 58 Days Past Statutory Deadline — Spoliation Warning Issued March 30, 2026 with April 14, 2026 Response Deadline Now Passed

This letter constitutes a formal response to the UCLA Compliance Office letter bearing reference number CMP373, received April 17, 2026. That letter states the UCLA Compliance Office reviewed documentation received from UCLA PD, "did not substantiate that UCLA PD Officers violated University policy" when they denied the Carry and Conceal Weapons permit (CCW), and declares "this matter closed."

This matter is not closed. The following sets forth the specific factual, procedural, and legal deficiencies in the CMP373 determination.

SECTION 1 — ESTABLISHMENT OF THE DOCUMENTARY RECORD

A. California Labor Code § 132(a) Crime Report — February 19, 2026

On February 19, 2026, a formal crime report was filed with the UCLA Police Department pursuant to California Labor Code § 132(a), naming Captain Jeff Chobanian, Badge #307, UCLA Police Department, as the subject of a reported criminal violation. Chief of Police Craig Valenzuela and Lieutenant Richard Davis were copied on that report at the time of filing.

As of the date of this letter — April 17, 2026 — **57 days** have elapsed since that crime report was filed. UCLA PD has assigned no case number, issued no acknowledgment, and provided no investigative response of any kind. That 57-day period of complete institutional silence is a documented fact in this record.

B. Three POST Complaints — Received by POST February 25, 2026

Three separate complaints were filed with the California Commission on Peace Officer Standards and Training (POST). POST's own records confirm receipt on February 25, 2026, and POST issued three separate Letters of Acknowledgment bearing the following individually assigned case numbers:

- **PUBLIC-26-000212**
- **PUBLIC-26-000213**
- **PUBLIC-26-000214**

The three POST complaints named the following UCLA PD personnel as respondents: Captain Jeff Chobanian (Badge #307), Chief of Police Craig Valenzuela, and Lieutenant Richard Davis (Badge #305).

Each POST acknowledgment letter states the following in identical language:

"If the allegation(s) meets the definition of serious misconduct pursuant to California Penal Code section 13510.8, POST will conduct an independent review."

California Penal Code § 13510.8 — **not University policy** — is the statutory standard POST itself identified as the applicable threshold for these complaints.

C. Spoliation Warning — March 30, 2026 — Response Deadline Passed

On March 30, 2026, a formal Demand for Production of Records and Spoliation Warning was transmitted to UC RASC, UC General Counsel, UCLA Chief of Police, UCLA Chancellor Julio Frenk, and CMS Case #7100158, demanding production of nine categories of records with a written response deadline of April 14, 2026. As of the date of this letter, that deadline has passed without any written response from any recipient of that demand.

SECTION 2 — THE WRONG LEGAL STANDARD WAS APPLIED

The UCLA Compliance Office determined it "did not substantiate that UCLA PD Officers violated University policy." **University policy compliance is not the governing standard for complaints** filed with the California Commission on Peace Officer Standards and Training. POST's own acknowledgment letters identify California Penal Code § 13510.8 as the applicable standard — not University policy.

The POST complaints were filed under the following California statutes. None of these statutes were addressed, cited, or analyzed anywhere in the CMP373 determination:

- **California Government Code § 3304(a)** — No public safety officer shall be subjected to punitive action, or threatened with such treatment, because of the lawful exercise of rights granted under the Public Safety Officers Procedural Bill of Rights Act (POBR).
- **California Government Code § 3305** — No public safety officer shall have any comment adverse to his interest entered in his personnel file, or any other file used for any personnel purposes by his employer, without the officer having first read and signed that instrument. Charles A. Harold Jr. never read, reviewed, or signed the "medically separated" classification used to deny his CCW.
- **California Government Code § 3306** — A public safety officer shall have 30 days within which to file a written response to any adverse comment entered in his personnel file. No response period was provided at any stage of this process.
- **California Government Code § 3306.5(b)** — Each employer shall keep each public safety officer's personnel file and make it available within a reasonable period of time after a request by the officer. This is a non-discretionary statutory obligation. It has not been fulfilled. The POBR compliance deadline of February 18, 2026 has now passed by 58 days.
- **California Government Code § 3309.5(e)** — Upon a finding by a superior court that a public safety department maliciously violated any provision of the POBR with intent to injure the public safety officer, the department shall be liable for a civil penalty not to exceed \$25,000 per violation, plus actual damages and reasonable attorney's fees.
- **California Penal Code § 26310** — A CCW denial requires written notice to the applicant within 15 days. No written notice was provided within 15 days or at any time.
- **California Penal Code § 26320** — Upon request, a denied applicant is entitled to a hearing before a three-member review board. No hearing was offered and no three-member review board was convened.
- **California Labor Code § 132(a)** — It is a misdemeanor for an employer to take any adverse action against an employee because that employee filed or made known the intention to file a claim for workers' compensation benefits.
- **California Penal Code § 13510.8** — POST's own identified standard for serious misconduct requiring independent review — the standard POST itself applied to these complaints.

A determination that "University policy was not violated" does not constitute a finding as to whether any of the foregoing California statutes were violated. Those statutes remain entirely unaddressed by the CMP373 determination.

SECTION 3 — THE INVESTIGATION IS VOID ON ITS FACE — FATAL CONFLICT OF INTEREST

The UCLA Compliance Office states it reviewed "documentation we received from UCLA PD" before reaching the CMP373 determination. This investigation process is structurally and procedurally defective for the following documented reason:

On February 19, 2026 — six days before the POST complaints were received by POST — a formal crime report was filed under California Labor Code § 132(a) with the UCLA Police Department, naming Captain Jeff Chobanian as the subject of a reported criminal violation. Chief of Police Craig Valenzuela and Lieutenant Richard Davis were copied on that report on the date of filing and thus had actual notice of its contents from that date forward.

The UCLA Compliance Office then used documentation supplied exclusively by the command structure of the UCLA Police Department — the same command structure whose personnel are the named and noticed subjects of an outstanding criminal complaint — to reach a determination exonerating that same command structure's conduct.

The California Department of Justice, Office of the Attorney General, states in its published Law Enforcement Complaint Policy that when a complainant alleges that a law enforcement officer committed a crime and the complaint is not resolved by the agency, the matter must be referred to the county district attorney in the county where the law enforcement agency is located. The Attorney General further states that its own intervention is appropriate where there is a demonstrated conflict of interest.

A law enforcement agency's chain of command cannot supply the evidentiary record used to exonerate its own officers from a criminal complaint filed against those same officers. The CMP373 investigation as conducted presents a structural conflict of interest that **renders the determination void on its face.**

The legally appropriate investigative bodies for this matter are: (1) the Los Angeles County District Attorney's Office, and (2) if that office declines, the California Attorney General's Office, Public Inquiry Unit, pursuant to its published complaint policy.

SECTION 4 — THE § 132(A) CRIME REPORT IS A SEPARATE MATTER NOT ADDRESSED

The CMP373 determination addresses only the CCW denial in the context of the POST complaints. The California Labor Code § 132(a) crime report filed on February 19, 2026 is a distinct criminal filing, separately documented, separately submitted, and not subsumed within the POST complaint process.

As of April 17, 2026, **57 days** have elapsed since that crime report was filed with UCLA PD. No case number has been assigned. No acknowledgment has been issued. No investigative response has been provided by Captain Chobanian, Chief Valenzuela, Lieutenant Davis, or any other UCLA PD representative.

The failure of a law enforcement agency to process a crime report filed by a retired peace officer — a report that names a sworn officer of that same agency, that was copied to the Chief of Police on the date of filing, and that has now gone unacknowledged for 57 days — is itself a documented fact that has been transmitted to all active regulatory bodies and will continue to be documented on the record.

SECTION 5 — THE WITHHELD PERSONNEL FILE — THE EVIDENCE THAT RESOLVES THE DISPUTE

On February 8, 2026, a formal written demand for production of the complete personnel file was submitted to Captain Chobanian pursuant to California Government Code § 3306.5 and California Penal Code § 832.8, with a compliance deadline of February 18, 2026. As of April 17, 2026 — **58 days past that compliance deadline** — no personnel file, no portion of a personnel file, and no response of any kind has been produced.

Separately, PRR #26-6921, filed through UCLA's official Information Practices channel and assigned to Finex Ngai, constitutes a second formal records request submitted through the University's own administrative process. That request has also not been fulfilled.

Additionally, on March 30, 2026, a comprehensive Demand for Production of Records was transmitted to UC RASC, UC General Counsel, the UCLA Chief of Police, UCLA Chancellor Frenk, and CMS Case #7100158, demanding the personnel file and eight additional categories of records with an April 14, 2026 response deadline. That deadline passed without any response.

The personnel file has now been demanded through three separate formal channels, under three separate legal authorities, over a period spanning from February 8, 2026 through March 30, 2026. No response has been received through any channel.

The UCLA Compliance Office reached a determination exonerating UCLA PD command staff using undisclosed documentation supplied by UCLA PD — while the personnel file that would independently verify or contradict that documentation has been withheld for 58 days past its statutory production deadline.

If that personnel file were produced, it would contain the following categories of records directly material to every allegation in the POST complaints:

1. The original employment classification entered on or about March 1, 1996 — whether it reads "medically separated," "disability retired," or "retired" and the identity of the individual who made that entry.
2. Any subsequent reclassification entries, the dates those entries were made, and whether Harold was afforded the opportunity to read and sign each entry before it was used against him, as required by Government Code § 3305.
3. The 2002 and 2013 CCW permit issuance records and the source documents upon which "RETIRED" was entered on both permits across an 11-year period under two different Chiefs of Police.
4. Any adverse comment entries made during the period 1996 through 2026 and whether the mandatory 30-day written response period under Government Code § 3306 was provided for each such entry.
5. The workers' compensation settlement of March 2003 and its express terms, including the CCW right established by that settlement — a right that Captain Chobanian's August 25, 2023 denial letter does not acknowledge existed.

The withholding of this file — while simultaneously using undisclosed documents from the same agency to close a complaint about that agency's conduct — is a fact that will be presented to every regulatory and judicial body with jurisdiction over this matter.

SECTION 6 — DOCUMENTED TEMPORAL SEQUENCE — STATED FOR THE RECORD

The following documented events are stated in precise chronological order without characterization:

- **February 8, 2026:** Formal POBR records demand submitted to Captain Chobanian. Compliance deadline: February 18, 2026. Chief Valenzuela copied on demand.
- **February 10, 2026:** Captain Chobanian refused all further communication: "Based on your last email, I will no longer communicate with you since you have threatened legal action against me."
- **February 18, 2026:** POBR compliance deadline passed. No records produced by Chobanian, Valenzuela, or any UCLA PD representative.
- **February 19, 2026:** California Labor Code § 132(a) crime report filed with UCLA PD naming Captain Chobanian as subject. Chief Valenzuela and Lieutenant Davis copied on the report at time of filing.
- **February 24, 2026:** Lieutenant James Echols sent three emails to Harold regarding the personnel file request, with Captain Chobanian and Lieutenant Davis copied on all three: (1) 1:24 PM — "your file has been located and is being sent to me"; (2) 2:23 PM — identical confirmation, file again confirmed located; (3) 3:04 PM — "I am currently searching for your file. Because of the period of passed time since your retirement, your file has been archived." A file twice confirmed as located at 1:24 PM and 2:23 PM became a file requiring continued searching at 3:04 PM — a 100-minute documented reversal — with both Chobanian and Davis copied throughout.
- **February 25, 2026:** Three POST complaints received by POST, assigned case numbers PUBLIC-26-000212, PUBLIC-26-000213, and PUBLIC-26-000214. Surgery performed on this date.

- **February 27, 2026:** RASC Benefits Analyst Beverly Jeanine Williams-Cook signed a letter terminating medical coverage effective April 30, 2026.
- **March 30, 2026:** Formal Demand for Production of Records and Spoliation Warning transmitted to UC RASC, UC General Counsel, UCLA Chief of Police, UCLA Chancellor Frenk, and CMS. Response deadline: April 14, 2026.
- **April 7, 2026:** Medical coverage reinstated only after intervention by DMHC Case #1409109 and CMS Case #7100158.
- **April 14, 2026:** Spoliation Warning response deadline passed. No written response received from any recipient.
- **April 17, 2026:** Date of this letter. § 132(a) crime report: 57 days without response. POBR records demand: 58 days past compliance deadline. POST complaints: 51 days since POST acknowledgment. Spoliation Warning: 3 days past response deadline with no response.

Under California law, a rebuttable presumption of retaliation arises when an employee suffers adverse employment action within 90 days of protected activity. The burden then shifts to the employer to demonstrate by clear and convincing evidence that the adverse action would have occurred regardless of the protected activity. The coverage termination letter signed on February 27, 2026 falls 8 days after the § 132(a) crime report and 2 days after the POST complaints were received by POST.

SECTION 7 — APPLICABLE STATUTES — FORMAL NOTICE

California Statutes:

- **California Penal Code § 132** — Offering false physical evidence in any official proceeding or investigation is a felony.
- **California Penal Code § 134** — Preparing false evidence with intent to use it in an official proceeding is a felony.
- **California Penal Code § 135** — Knowingly destroying or concealing material evidence relevant to an official proceeding is a misdemeanor.
- **California Penal Code § 135.5** — Any person who knowingly alters, tampers with, conceals, or destroys relevant evidence in any disciplinary proceeding against an officer, for the purpose of harming that officer, is guilty of a misdemeanor.
- **California Penal Code § 136.1** — Preventing or attempting to prevent a witness from providing testimony at a legal proceeding — including through intimidation or coercion — is a crime punishable as a misdemeanor or felony.
- **California Government Code § 8547.3 / § 8547.8** (California Whistleblower Protection Act, applicable exclusively to the University of California) — Any person who intentionally engages in acts of retaliation is subject to a fine not to exceed \$10,000 and imprisonment in county jail for a period not to exceed one year.
- **California Government Code § 3304(a)** (POBR) — No public safety officer shall be subjected to punitive action or threatened with such treatment because of the lawful exercise of rights under the POBR.
- **California Government Code § 3309.5(e)** (POBR) — Upon a finding of malicious violation with intent to injure, the public safety department shall be liable for a civil penalty not to exceed \$25,000 per violation, plus actual damages and reasonable attorney's fees.
- **California Evidence Code § 413** — The trier of fact may draw the strongest possible adverse inference against a party who suppresses evidence that the party was required to produce.

Federal Statutes:

- **18 U.S.C. § 1512** — Federal tampering with a witness, victim, or informant; obstruction of official proceedings before any federal department or agency.
- **18 U.S.C. § 1519** — Federal destruction, alteration, or falsification of records in connection with any federal investigation or proceeding. Applicable in the context of active parallel proceedings: CMS Case #7100158 and DMHC Case #1409109.

SECTION 8 — FOUR SPECIFIC DEMANDS — WRITTEN RESPONSE REQUIRED BY MAY 1, 2026

Written responses to all four demands below are required at chuckharold@gmail.com no later than ten (10) business days from the date of this letter — by May 1, 2026.

DEMAND 1

Identify by full legal name, title, and employee number the individual who authored, signed, and is responsible for the CMP373 determination letter.

DEMAND 2

Produce the complete and unredacted inventory of every document received from UCLA PD that was reviewed in connection with the CMP373 investigation, including the date each document was received and the identity of the UCLA PD representative who transmitted it.

DEMAND 3

State in writing whether the California Labor Code § 132(a) crime report filed on February 19, 2026 — naming Captain Jeff Chobanian and copied to Chief Craig Valenzuela and Lieutenant Richard

Davis — was transmitted to the Los Angeles County District Attorney's Office or the California Attorney General's Office for independent investigation, and if it was not so transmitted, state the specific legal basis upon which the UCLA Compliance Office determined that independent referral was not required.

DEMAND 4

State in writing whether the UCLA Compliance Office contends it possesses lawful jurisdiction to investigate a criminal complaint filed against sworn UCLA PD command staff using documentation supplied exclusively by that same command staff, and identify with specificity the legal authority upon which such jurisdiction rests.

Respectfully submitted,



Charles A. Harold Jr.

Badge #341 — UCLA Police Department (Retired)
Founding President, Federated University Police Officers' Association (FUPOA)
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April 17, 2026

On Fri, Apr 17, 2026, 1:24 PM UCLA Compliance Office <compliance@compliance.ucla.edu> wrote:

CONFIDENTIAL

Dear Mr. Harold: The UCLA Compliance Office is responsible for investigating complaints filed against UCLA PD Sworn Officers. Our office received the three complaints you filed on February 25, 2026 with the California Commission on Peace Officer Standards & Training. After reviewing your complaints and documentation we received from UCLA PD, we did not substantiate that UCLA PD Officers violated University policy when they denied your Carry & Conceal Weapons permit (CCW). We now consider this matter closed.

The UCLA Compliance Office
UCLA Wilshire Center, Suite 700
Los Angeles, CA 90024

 **2026-04-17 reply to UC Compliance re 132(a) CMP373_Reply_April17_2026.pdf**
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