

Flores et al. v. Bennett et al.,

**Exhibit 1 to
Declaration of Madison Hahn**

From:
Date: November 08, 2021 4:54:47 PM (-06)
To: Leslie King;Monica Chahal;Marco J. De La Garza;Lori Bennett
Cc: Lorrie Hopper;Gurdeep Hebert
Subject: **RE: Poster**

Attachments: CLOVIS COMMUNITY COLLEGE Posting Instructions (003).docx;

Thank you Leslie!

Young Americans for Freedom is an approved club on campus (political club). Jennifer Hanson is their advisor. This is one of three they put up. Lorrie: let me know what **PRA Exempt** says and we gladly take down.

Attached is our posting guidelines.

Thanks,

Patrick Stumpf *(He/Him)*

Senior Program Specialist- Student Activities

Clovis Community College

10309 N. Willow Avenue

Fresno, CA, 93730

(559) 325-5243

www.cloviscollege.edu

State Center Community College District

Apply for CalFresh at www.getcalfresh.org/s/clovis-college



From: Leslie King <leslie.king@cloviscollege.edu>

Sent: Monday, November 8, 2021 2:47 PM

To: Monica Chahal <monica.chahal@cloviscollege.edu>; Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Lori Bennett <lori.bennett@cloviscollege.edu>

Cc: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>

Subject: Poster

Wanted to give you a heads up that there could be some problems with these posters. I ran this by Lorrie Hopper, and she said she would contact **PRA** **PRA E** These were posted by an official club on campus (Jennifer Hanson is the advisor). Patrick said that it's a gray area because of free speech... I've talked to several people that are very uncomfortable with it, and one person said they would file a harassment claim if these posters don't come down. Thanks!

Let us ever beware the destructive influences and blind arrogance of the Left.

Leftist Ideas: "Progress" That Always Leads to Death.

Murders by "Progressive Social Movements" in the name of "helping the people":

China	65 million
Soviet Union	20 million
Cambodia	2 million
North Korea	2 million
Africa	1.7 million
Afghanistan	1.5 million
Eastern Europe	1 million
Vietnam	1 million
Latin America	150,000

Source: The Sixth Sense of Journalism, Harvard University Press

YOUNG AMERICANS
www.yaf.org

For more information about Young Americans Foundation, visit www.yaf.org • National Headquarters, 11400 Commonwealth Blvd., Suite 100, Fairfax, Virginia 22031, 800-USA-1376 • The Reagan Ranch Center, 237 Dale Street, Santa Barbara, California 93101, 800-USA-4776

Sent from my iPhone

Flores et al. v. Bennett et al.,

**Exhibit 2 to
Declaration of Madison Hahn**

From:
Date: November 08, 2021 4:54:47 PM (-06)
To: Leslie King;Monica Chahal;Marco J. De La Garza;Lori Bennett
Cc: Lorrie Hopper;Gurdeep Hebert
Subject: **RE: Poster**

Attachments: CLOVIS COMMUNITY COLLEGE Posting Instructions (003).docx;

Thank you Leslie!

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Attached is our posting guidelines.

Thanks,

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From: Leslie King <leslie.king@cloviscollege.edu>

Sent: Monday, November 8, 2021 2:47 PM

To: Monica Chahal <monica.chahal@cloviscollege.edu>; Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Lori Bennett <lori.bennett@cloviscollege.edu>

Cc: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>

Subject: Poster

Wanted to give you a heads up that there could be some problems with these posters. I ran this by Lorrie Hopper, and she said she would contact **PRA** **PRA E** These were posted by an official club on campus (Jennifer Hanson is the advisor). Patrick said that it's a gray area because of free speech... I've talked to several people that are very uncomfortable with it, and one person said they would file a harassment claim if these posters don't come down. Thanks!

Flores et al. v. Bennett et al.,

**Exhibit 3 to
Declaration of Madison Hahn**

From: Marco J. De La Garza
Date: November 08, 2021 5:07:20 PM (-06)
To: Patrick Stumpf; Gurdeep Hebert
Subject: **RE: Poster**

Attachments:

We need to meet and review the guidelines for posting flyers by clubs. We also need to review (if any) guideline for social media.

Marco

Marco J. De La Garza
Clovis Community College
Vice President, Student Services
(559) 325-5214

Creating Opportunities...One Student at a Time



From: Patrick Stumpf <patrick.stumpf@cloviscollege.edu>
Sent: Monday, November 8, 2021 3:01 PM
To: Leslie King <leslie.king@cloviscollege.edu>; Monica Chahal <monica.chahal@cloviscollege.edu>; Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Lori Bennett <lori.bennett@cloviscollege.edu>
Cc: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>; Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu>
Subject: RE: Poster

Thank you Leslie!

Young Americans for Freedom is an approved club on campus (political type club). Jennifer Hanson is their advisor. This is one of three they put up. Lorrie: let me know what **PRA Exempt** says and if he advises that we take down, we will gladly do so.

Thanks,

Patrick Stumpf *(He/Him)*

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From: Leslie King <leslie.king@cloviscollege.edu>
Sent: Monday, November 8, 2021 2:47 PM
To: Monica Chahal <monica.chahal@cloviscollege.edu>; Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Lori Bennett <lori.bennett@cloviscollege.edu>
Cc: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>

Flores et al. v. Bennett et al.,

**Exhibit 4 to
Declaration of Madison Hahn**

From: Gurdeep Hebert
Date: November 08, 2021 7:11:00 PM (-06)
To: Patrick Stumpf
Subject: **RE: Poster**

Attachments:

We approved all the posters they brought?

Gurdeep

Gurdeep Hébert (she/her)
Dean, Student Services
Clovis Community College
10309 N. Willow Avenue
Fresno, CA 93730
559-325-5378 office
559-307-5499 cell



Creating Opportunities...One Student at a Time



From: Patrick Stumpf <patrick.stumpf@cloviscollege.edu>
Sent: Monday, November 8, 2021 3:32 PM
To: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>
Cc: Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu>
Subject: RE: Poster

Hi Lorrie,

See attached.

- This does say - Posters with inappropriate or offense language or themes are not permitted and will not be approved.

Perhaps this is our mistake and we should have classified it as that. Since it is a political club, we have allowed political type posters from the club before. I can see how this would fall into this category though. Let me know.

Thanks,

Patrick Stumpf (He/Him)

Senior Program Specialist- Student Activities

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Flores et al. v. Bennett et al.,

**Exhibit 5 to
Declaration of Madison Hahn**

From: Gurdeep Hebert
Date: November 08, 2021 7:32:57 PM (-06)
To: Patrick Stumpf
Subject: **FW: Poster**

Attachments:

Did we approve these?

Gurdeep

Gurdeep Hébert (she/her)
Dean, Student Services
Clovis Community College
10309 N. Willow Avenue
Fresno, CA 93730
559-325-5378 office
559-307-5499 cell



Creating Opportunities...One Student at a Time



From: Patrick Stumpf <patrick.stumpf@cloviscollege.edu>
Sent: Monday, November 8, 2021 3:01 PM
To: Leslie King <leslie.king@cloviscollege.edu>; Monica Chahal <monica.chahal@cloviscollege.edu>; Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Lori Bennett <lori.bennett@cloviscollege.edu>
Cc: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>; Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu>
Subject: RE: Poster

Thank you Leslie!

Young Americans for Freedom is an approved club on campus (political type club). Jennifer Hanson is their advisor. This is one of three they put up. Lorrie: let me know what **PRA Exempt** says and if he advises that we take down, we will gladly do so.

Thanks,

Patrick Stumpf (He/Him)

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Flores et al. v. Bennett et al.,

**Exhibit 6 to
Declaration of Madison Hahn**

From: patrick.stumpf@cloviscollege.edu
Date: November 08, 2021 7:48:49 PM (-06)
To: Gurdeep Hebert
Subject: **Re: Poster**

Attachments:

Yes...they are the same ones we had approved a couple years ago. They come from the national student organization and we were on the fence about it. I wish we would have held off and we sent to you first.

Another issue that keeps popping up in my head: if they had this material at a booth at say Rocktoberfest...how would we navigate that?

Sent from my iPhone

On Nov 8, 2021, at 5:33 PM, Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu> wrote:

Did we approve these?

Gurdeep

Gurdeep Hébert (she/her)
Dean, Student Services
Clovis Community College
10309 N. Willow Avenue
Fresno, CA 93730
559-325-5378 office
559-307-5499 cell



Creating Opportunities...One Student at a Time



From: Patrick Stumpf <patrick.stumpf@cloviscollege.edu>
Sent: Monday, November 8, 2021 3:01 PM
To: Leslie King <leslie.king@cloviscollege.edu>; Monica Chahal <monica.chahal@cloviscollege.edu>; Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Lori Bennett <lri.bennett@cloviscollege.edu>
Cc: Lorrie Hopper <lorrie.hopper@cloviscollege.edu>; Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu>
Subject: RE: Poster

Thank you Leslie!

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Thanks,

Patrick Stumpf (He/Him)
Senior Program Specialist- Student Activities
Clovis Community College
10309 N. Willow Avenue
Fresno, CA, 93730

Flores et al. v. Bennett et al.,

**Exhibit 7 to
Declaration of Madison Hahn**

From: Patrick Stumpf
Date: November 15, 2021 7:30:54 AM (-06)
To: Gurdeep Hebert
Subject: **Re: Posters**

Attachments:

Let me know how this sounds-

PRA Exemption

Sent from my iPhone

On Nov 15, 2021, at 4:21 AM, Patrick Stumpf <patrick.stumpf@cloviscollege.edu> wrote:

Sounds good!

I will have student workers take down today. Will also email him and cc you.

Sent from my iPhone

On Nov 14, 2021, at 10:20 PM, Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu> wrote:

Between you and me.

Please don't share this email. Posters need to come down per administration.

Let's set up a time to meet with **PRA Ex**

Gurdeep Sihota-Hebert
Dean, Student Services
Clovis Community College

From: Lori Bennett <lori.bennett@cloviscollege.edu>
Sent: Friday, November 12, 2021 8:35:54 AM
To: Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu>
Subject: Posters

Hi,
I just wanted to confirm that we will be taking down the posters we discussed today. If you need a reason, you can let them know that Marco and I agreed they aren't club announcements.

We can discuss the updated list of rules next week.

Thanks.
Lori

Lori Bennett, Ed.D.
President

Clovis Community College

Mission Statement:
Creating Opportunities...One Student at a Time

Flores et al. v. Bennett et al.,

**Exhibit 8 to
Declaration of Madison Hahn**

From: Patrick Stumpf
Date: November 15, 2021 7:30:54 AM (-06)
To: Gurdeep Hebert
Subject: **Re: Posters**

Attachments:

Let me know how this sounds-

PRA Exemption

Sent from my iPhone

On Nov 15, 2021, at 4:21 AM, Patrick Stumpf <patrick.stumpf@cloviscollege.edu> wrote:

Sounds good!

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Sent from my iPhone

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Dean, Student Services
Clovis Community College

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Thanks.
Lori

Lori Bennett, Ed.D.
President

Flores et al. v. Bennett et al.,

**Exhibit 9 to
Declaration of Madison Hahn**

From: Patrick Stumpf
Date: November 15, 2021 7:30:54 AM (-06)
To: Gurdeep Hebert
Subject: **Re: Posters**

Attachments:

Let me know how this sounds-

PRA Exemption

Sent from my iPhone

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To: Marco J. De La Garza <marco.delagarza@cloviscollege.edu>; Gurdeep Hebert <gurdeep.hebert@cloviscollege.edu>
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Lori

Lori Bennett, Ed.D.
President

Flores et al. v. Bennett et al.,

**Exhibit 10 to
Declaration of Madison Hahn**



State Center Community College District

1171 Fulton • Fresno, California 93721 • (559) 243-7121 • www.scccd.edu

December 21, 2021

VIA –EMAIL (Jroth@yaf.org)

Re: Response to Public Records Act Request

Dear Mr. Roth:

This letter constitutes the State Center Community College District's (District) response to your Public Records Act (PRA) request dated Saturday, November 30, 2021. This response is provided under the timelines prescribed by Government Code section 6253 subdivision (c). As you were notified on December 10, 2021, the District required a 14-day extension before submitting this response.

Request No. 1: All records – including but not limited to rules, guidelines, policy statements, directives, documents, PowerPoints, emails, letters, instant messages, internal communications, and all other materials – that state the University's policies that are currently in force or that have been in force at any time between November 1, 2021 and the present regarding freedom of expression, statements made by students or faculty, and postings of flyers or other materials in public places on campus by students or faculty.

Response to Request No. 1: Please see enclosed records responsive to your request.

Request No. 2: 2. Emails, text messages, and all other communications sent to or from Gurdeep Hebert and Patrick Stumpf between November 1, 2021 and November 30, 2021 that contain any of the following terms (not case sensitive):

- a) Free speech
- b) Posters
- c) Flyers
- d) Triggering
- e) Triggered
- f) Young America's Foundation
- g) Young Americans Freedom
- h) YAF

Response to Request No. 2: The District will produce records responsive to your request that are not exempt from disclosure. The District will redact exempt information from records that are subject to disclosure.

Records that may be withheld or information that may be redacted include:

- The “personnel” exemption. (See Gov’t Code, 6254 subd. (c) [“[p]ersonnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy” are exempt from disclosure].)
- Exemption “pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege” (Gov’t Code, 6254 subd. (k); Cal. Const. art. I, § 1 [right to privacy]; Family Educational Rights and Privacy Act; Education Code sections 76240 *et seq.*; Evid. Code, § 915 [attorney-client privilege/ work product].)
- Deliberative process privilege. (Gov’t Code, § 6255.)

The District expects to complete its production of records by January 31, 2022. The District official responsible for this response is Cheryl Sullivan, Vice Chancellor, Finance and Administration.

Sincerely,

Matthew T. Besmer/em

Matthew T. Besmer, General Counsel
State Center Community College District

Flores et al. v. Bennett et al.,

**Exhibit 11 to
Declaration of Madison Hahn**

CLOVIS COMMUNITY COLLEGE

Poster/Flyer Instructions:

(Revised September 2018)

Posting instructions:

- Groups/individuals/clubs can post up to 25 posters.
- Posters are to be posted in appropriate indoor poster boards with 3-4 tacks (two at the top corners of the poster and one to two at the bottom).
- Posters can also be posted on permitted outside kiosks.
- Posters should never overlap one another and should be posted at least two to three finger lengths across.
- Posters need to be in a straight and upright position.

Posting Information:

- All posters not bearing the Clovis Community Logo or in the provided Clovis Community College Template (i.e. posters not from a College Department or Division) **must be approved and stamped by the Clovis Community College Student Center Staff**. Failure to do so will result in unapproved/unstamped flyers being removed and thrown away.
- Posters with inappropriate or offense language or themes are not permitted and will not be approved.
- Posters posted anywhere other than designated areas will be removed.
- Posters with unapproved (post approval) writing will be removed.
- Damaged posters will be removed.