Timeline of Events provided by Prof. Matthew Abraham (with reference to Attachments):

- **February 6th**, SBS Dean Lori-Poloni Staudinger contacts Abraham to indicate that she needs to meet with him about his outside employment and that she has not approved it.
- **February 12**th Abraham and Poloni-Staudinger meet on Zoom. Poloni-Staudinger tells Abraham that he must decide between his U of A tenured position in the English Department or the position at the Attorney General's Office. Abraham inquires if the Dean's evaluation is based on ABOR 6-705 and UHAP 2.06.06, and 2.06.08 and whether there is an appeals process; he also requests further consideration. The Dean later that day informs Abraham that she has checked and confirmed there is no appeals process for a Dean's CoC assessment and that he must decide within three business days which job he will keep.
- **February 15th-28th**—The Dean insists that Abraham either should resign one of the two positions, apply to take a leave, or reduce his FTE. Abraham states that he does not believe ABOR and UHAP policies are being followed, indicating on February 28th that he is appealing Poloni-Staudinger's assessment to the Provost.
- **February 21st**—Abraham's counsel emails the Office of the General Counsel's Laura Todd Johnson and David Wagner requesting a meeting to discuss the situation. Wagner refuses the meeting, stating on February 28th that the matter is being handled internally and that Wagner is not a decision maker. *See Attachment 1*.
- March 6th, 2025 Abraham meets with Interim Provost Ron Marx and Vice Provost for Faculty Affairs Andrea Romero about Abraham's disagreement with his Dean on the conflict-of-commitment assessment and his dual-employment with the U of A and the Arizona AG's Office. Leila Hudson attends as an observer. Marx assures Abraham that he will do some research and get back to him with a decision about Abraham's appeal of Poloni-Staudinger's CoC assessment, limiting Abraham's work to 5 hours a week at the AG's Office. Marx never does get back to Abraham.
- March 14th, 2025: OGC's David Wagner emails Peter Kozinets at Zwillinger Wulkan requesting information about Abraham's disclosures to the AG's Office about the U of A full-time position and Abraham's lawsuit against ABOR. See Attachment 2.
- March 16th, 2025: Abraham writes to the Arizona Board of Regents to point out that the U of A administration is using the concept of "conflict of commitment "to target critics of the administration. *See Attachment 3*.
- March 17th, 2025 Abraham writes to President Garimella, other senior leaders, and specific members of the OGC including Laura Todd Johnson and David Wagner about the specific problems in Wagner's 3-14-25 email to Kozinets, highlighting Wagner's misrepresentations of the Arizona Rules of Professional Conduct and <u>A.R.S 41-191</u>. See *Attachment 4*.
- **March 17th, 2025** Abraham requests his human resources onboarding paperwork from the Arizona Attorney General's Office in which he disclosed his U of A position. HR tells him that it will try to locate this paperwork, have it scanned, and send it to him by the end of the week. Abraham never receives this paperwork.

- March 24th, 2025 @ 12:20 pm--Abraham's unit chief, Carey Turner, at the AG's Office emails Abraham to inquire if he has resolved the U of A situation and if he is currently employed there. See *Attachment* 5.
- March 24th, 2025 @ 4:42 pm--- The Chief of Operations at the Arizona AG's Office, Leslie Heathcotte, leaves a voicemail for Abraham requesting that he call her. Heathcotte follows up with an email to Abraham's azag.gov address at 4:44 pm. HR specialist, Paula Daniels, texts Abraham at his personal cellphone at 4:44 pm requesting that Abraham call Heathcotte. Abraham returns the call at 4:55 pm. Heathcotte informs Abraham that his services are no longer needed with the Arizona AG's Office. Abraham's credentials are immediately suspended, his access to the Tucson AG's Office is restricted, and he is told that his personal belongings will be returned to him when they are collected and inventoried by the Arizona Department of Administration. When Abraham asks what the termination is all about, Heathcotte tells him that management does not discuss the reasons for termination with at-will employees. Heathcotte offers Abraham the opportunity to resign by 9 am on March 25th or to accept the dismissal.
- March 25th @ 10 am--- Abraham is formally dismissed by letter. See Attachment 6.
- March 25th, 2025 @ 4:44 pm AG's HR specialist Paula Daniels informs Abraham by telephone that he may go to the Tucson AG's office the next day to pick up his belongings that have been inventoried and packed. She instructs him to turn in all state equipment at that time
- March 25th, 2025: Abraham's counsel emails a notice to preserve all communications between the University, ABOR, and the AZ AG's Office to Laura Todd Johnson and David Wagner. See Attachment 7
- March 26th, 2025 @8:30 am--- Abraham returns to the AG's Office to pick up his belongings. Tucson Child and Family Protection Unit Chief Carey Turner tells Abraham that Turner's email on March 24th about the U of A situation was prompted by an email Turner received from the Phoenix AG's Office asking if Abraham holds "outside employment." Turner has no information about why Abraham was suddenly dismissed.
- March 27th, 2025: Abraham requests a follow-up meeting with Marx about his dismissal from the AG's Office and the unresolved issues from the March 6th meeting. Marx declines Abraham's request, stating that since Abraham no longer works at the AG's Office, the conflict of commitment issue is no longer an issue and there is no reason to meet. Marx copies David Wagner on his message. Abraham responds expressing perplexity. See Attachment 8.
- **March 31**st: Abraham writes to President Garimella requesting ABOR 6-914 protections, copying the OGC, Marx, and Romero. Garimella never replies. *See Attachment* 9.
- **April 7th**: Abraham's petition to the AZ Supreme Court in his public records litigation against ABOR is filed. *See Attachment 10*.
- **April 16**th: Dr. Keith Maggert emails Committee on Conciliation Report to Lori Poloni-Staudinger and Matthew Abraham. *See Attachment 11*.
- **April 16**th: Abraham submits an updated grievance petition with the Faculty Center requesting a CAFT hearing, naming Poloni-Staudinger, Ron Marx, Andrea Romero, and David Wagner as the respondents.

- **April 22nd:** Provost Marx emails Abraham about Abraham's March 27th request for ABOR 6-914 whistleblower protections, indicating that the Provost's Office is the proper place for faculty to file written complaints pursuant to the policy. *See Attachment 12*.
- **April 23**rd: English Department Head Cristina Ramirez informs Abraham that based on "a careful analysis" and the SBS "space policy," he will need to move out of his office by the end of May. No alternative office arrangements are mentioned. *See Attachments 13 and 14*.
- **April 24**th: Abraham responds to Marx's April 22nd email to point out that the Provost's Office is only one of several pathways to pursue the protections listed in ABOR 6-914. *See Attachment 12 mentioned above.*