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7 BOARD OF TRUSTEES OF THE
8 CALIFORNIA STATE UNIVERSITY and
JEFFREY ARMSTRONG

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SAN LUIS OBISPO
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14 KATHIE WALKER,

15 Petitioner/Plaintiff,

16 v.

17 BOARD OF TRUSTEES OF THE
18 CALIFORNIA STATE UNIVERSITY and
JEFFREY ARMSTRONG, in his official
19 capacity as President of California Polytechnic
State University, San Luis Obispo,

20 Respondent/Defendant.
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Case No. 26CV-0166

**DECLARATION OF JASON MOCKFORD
IN SUPPORT OF OPPOSITION TO
MOTION FOR JUDGMENT**

*Filed concurrently with Opposition to Motion
for Judgment; Request for Judicial Notice*

Hearing

Date: November 4, 2026

Time: 9:00 a.m.

Dept.: 4

Assigned for All Purposes to:
Hon. Tana L. Coates
Department 4

Action Filed: March 18, 2026

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1 support student development and organizational accountability. As part of that mission, since
2 around 2015, the FSL Office has implemented an event registration process under which all events
3 sponsored or endorsed by a recognized Greek organization must be registered with the FSL Office
4 in advance.

5 7. As part of that mission, the FSL Office implements an event registration process
6 under which all events sponsored or endorsed by a recognized Greek organization must be
7 registered with the FSL Office in advance. However, registration is not approval, and the FSL
8 Office does not approve (or deny) events.

9 8. The purpose of the event registration process is to enable the University to ensure
10 that student-organized events comply with university safety policies, including requirements
11 around alcohol management and sober monitors, before those events occur. The ultimate goal is to
12 promote student health and safety, and in particular, to prevent accidents, injuries, or other harms
13 related to overconsumption or underage consumption of alcohol.

14 Code Enforcement Concerns

15 9. In my role as Senior Director, Leadership & Service, I have participated in
16 discussions among Cal Poly administrators regarding the City's enforcement activities affecting
17 fraternity and sorority houses. Based on those discussions and information provided to University
18 administrators in the ordinary course of our responsibilities, I understand that students perceive the
19 City of San Luis Obispo has increased its attention and enforcement actions on properties
20 suspected of operating as unpermitted fraternity or sorority houses.

21 10. Based on students' concerns, I am concerned about the potential chilling effect the
22 City's enforcement activities have on students' willingness to participate in university safety
23 programs as well as the effect on student privacy and perceptions of procedural fairness.

24 11. On or around March 10, 2026, the City informed Cal Poly that the City would
25 begin sending weekly emails to Cal Poly to document alleged code violations by fraternities and
26 sororities and to request that the University impose academic or disciplinary consequences on
27 students based on the City's own enforcement determinations. Our office has received five such
28 emails since March 10, 2026.

1 12. Students have reported to me of receiving conflicting guidance from City
2 enforcement staff about whether enforcement is complaint-based or proactive. From these reports,
3 students seem to find it difficult to understand what compliance requires.

4 13. Through my interactions with student leaders and FSL Office personnel, I am
5 aware that fraternities and sororities use the DoorList app to help manage attendance at events. In
6 recent months, student leaders of several chapters have reported to me that they have stopped
7 using the DoorList app because they believed the City was using information through that
8 platform for enforcement purposes. Whether that belief was accurate or not, in assessing these
9 reports, I am concerned that students have become less willing to use such apps.

10 14. Student leaders from multiple recognized Greek chapters have sought guidance
11 from me about receiving many City-issued citations. During those discussions, student leaders
12 consistently expressed uncertainty regarding how to comply with City requirements and concerns
13 about the manner in which enforcement was being conducted.

14 15. Based on my interactions with student leaders and discussions with University
15 administrators, including Student Affairs personnel, and based on the concerns repeatedly
16 expressed to me in my capacity as an FSL Office administrator, I am deeply concerned that
17 disclosure of residential addresses contained in FSL Event Registration records would discourage
18 students from participating fully in the FSL event registration process. Because the primary
19 purpose of the event registration process is to promote student health and safety by encouraging
20 student organizations to provide the University with complete and accurate information about their
21 events, any reduction in student participation or candor would undermine that objective. These
22 concerns are among the reasons Cal Poly treats the residential address information contained in
23 FSL Event Registration records as private and maintains its confidentiality to the fullest extent
24 permitted by law.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on this 10th day of July, 2026, at San Luis Obispo, California.



Jason Mockford

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

On July 10, 2026, I served true copies of the following document(s) described as **DECLARATION OF JASON MOCKFORD IN SUPPORT OF OPPOSITION TO MOTION FOR JUDGMENT** on the interested parties in this action as follows:

Attorneys for Plaintiff,
KATHIE WALKER

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 10, 2026, at Los Angeles, California.

Leticia Espinoza
Leticia Espinoza