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7 BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY and
8 JEFFREY ARMSTRONG
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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SAN LUIS OBISPO
14

15 KATHIE WALKER,

16 Petitioner/Plaintiff,

17 v.

18 BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY and
19 JEFFREY ARMSTRONG, in his official
capacity as President of California Polytechnic
State University, San Luis Obispo,
20

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

**DECLARATION OF JENNIFER HAFT 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

DECLARATION OF JENNIFER HAFT

I, JENNIFER HAFT, declare as follows:

1. I am over the age of 18, and I submit this declaration in support of the Opposition to the Motion for Judgment by Respondents/Defendants Board of Trustees of the California State University and Jeffrey D. Armstrong, in his official capacity as President of California Polytechnic State University, San Luis Obispo (together, "Cal Poly"). Except as otherwise indicated, the facts set forth herein are known to me personally or have been determined by my review of official records and other documents that are maintained by Cal Poly. As to those matters stated on information and belief, I am informed and believe that they are true. If called as a witness, I could and would competently testify thereto.

2. I am now and at all relevant times herein have been employed by Cal Poly as Chief of Staff of the Office of the President. In my capacity as Chief of Staff, I serve as the President's senior advisor, overseeing the Office of the President and providing strategic leadership for presidential initiatives, executive operations, and cross-campus priorities. The position also serves as the President's primary liaison and trusted advisor, coordinating with university and external stakeholders, managing Cabinet operations and presidential communications, and ensuring the effective execution of institutional priorities and special projects. I am familiar with the facts being declared through my work with student government and Greek life organizations and leaders as well as other administrators.

3. Cal Poly recognizes a community of Greek organizations (fraternities and sororities) that operate under the oversight of the University's Fraternity and Sorority Life Office ("FSL Office").

4. University recognition confers meaningful benefits on these organizations, including the right to use the Cal Poly name, access to university facilities and funding, and participation in university event-scheduling and promotion resources.

5. In exchange, recognized Greek organizations are subject to university policies that require them to comply with applicable laws and university standards as a condition of maintaining their recognized status.

1 6. In my role as Chief of Staff, I have participated in discussions with various student
2 leaders as well as FSL and Cal Poly administrators regarding the City's enforcement activities
3 affecting fraternity and sorority houses. Based on those discussions and information provided to
4 University administrators in the ordinary course of our responsibilities, I understand that students
5 perceive the City of San Luis Obispo has increased its attention and enforcement actions on
6 properties suspected of operating as unpermitted fraternity or sorority houses.

7 7. Based on students' concerns voiced to me, I am concerned about the potential
8 chilling effect the City's enforcement activities have on students' willingness to participate in
9 university safety programs as well as the effect on student privacy and perceptions of procedural
10 fairness. The public dissemination of private residential addresses where student events took place
11 could further erode students' willingness to share information with the university if they believe
12 that information is being used beyond the purposes intended resulting in punitive measures against
13 them.

14 8. On or about October 4, 2026, student leaders reported to me in my role as Chief of
15 Staff that City code enforcement officers attended a semi-private Greek recruitment event on Cal
16 Poly's campus, representing their visit as educational in nature. Student leaders further reported
17 that information gathered at that event was subsequently used to issue zoning violations to
18 fraternity houses whose addresses appeared on recruitment materials distributed at the event. The
19 reports resulted in numerous conversations with student leaders expressing concern about
20 engaging with City personnel in University settings.

21 9. During meetings I had with student leaders, I learned that students had been
22 receiving what they found to be conflicting guidance from City enforcement staff about whether
23 enforcement is complaint-based or proactive. Students seemed to find it difficult to understand
24 what compliance requires.

25 10. Student leaders informed me that numerous notices of violation were posted on
26 student homes during the winter holiday break, even though the alleged violations had occurred
27 months earlier. According to the students, the notices indicated that the appeal window had
28 already closed, or would close, before most students returned from break. According to the

1 students, some notices further suggested that students could challenge a citation if Cal Poly
2 confirmed that no event had occurred, while simultaneously indicating that the university was
3 unlikely to provide that confirmation. Student leaders expressed concern with the notices and
4 sought assistance from the University regarding these notices.

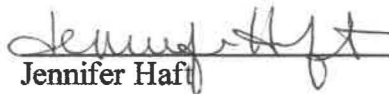
5 11. Through my interactions with student leaders and FSL Office personnel, I am
6 aware that fraternities and sororities use the DoorList app to help manage attendance at events. In
7 or around April 2026, student leaders informed me that several chapters stopped using the
8 DoorList app because they believed the City was using information through that platform for
9 enforcement purposes.

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

14 13. Based on my interactions with student leaders and discussions with University
15 administrators, including FSL Office personnel, and the concerns repeatedly expressed to me and
16 the University, I am concerned that disclosure of residential addresses contained in FSL Event
17 Registration records would discourage students from participating fully in the FSL event
18 registration process. Those concerns are among the reasons the University treats the information as
19 private.

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

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

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26 
27 Jennifer Haft
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1 **PROOF OF SERVICE**

2 **Kathie Walker vs. Board of Trustees of the California State University, et. al.**
3 **Case No. 26CV-0166**

4 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is 444 South
7 Flower Street, 40th Floor, Los Angeles, CA 90071-2942.

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

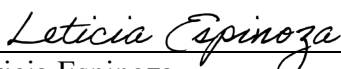
11 Matthew S.L. Cate, Esq.
12 LAW OFFICES OF MATTHEW S.L. CATE
13 101 Montgomery Street, Suite 900
14 San Francisco, CA 94104
15 Tel. No.: 415.964.4400
16 Email: matt@matthewcatelaw.com

Attorneys for Plaintiff,
KATHIE WALKER

17 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
18 document(s) to be sent from e-mail address lespinoza@bwslaw.com to the persons at the e-mail
19 addresses listed in the Service List. I did not receive, within a reasonable time after the
20 transmission, any electronic message or other indication that the transmission was unsuccessful.

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

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

24 
25 Leticia Espinoza