

Matthew S.L. Cate (SBN 295546)
matt@matthewcatelaw.com
LAW OFFICE OF MATTHEW S.L. CATE
101 Montgomery Street, Suite 900
San Francisco, CA 94104
Tel/Fax: 415-964-4400

San Luis Obispo Superior Court
By: 
Sonja Delcid, Deputy Clerk

Counsel for Petitioner/Plaintiff Kathie Walker

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN LUIS OBISPO**

KATHIE WALKER,

Petitioner/Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVER-
SITY, *et al.*,

Respondents/Defendants.

Case No. 26CV-0166

Hon. Tana L. Coates

**Reply Declaration of Kathie Walker in
Support of her Motion for Judgment on
Verified Petition for Writ of Mandate;
Reply Ex. 1**

Hearing: November 4, 2026

Time: 9:00 a.m.

Dept.: 4

Action filed: March 18, 2026

Declaration of Kathie Walker

I, Kathie Walker, declare:

1. I am the petitioner in the above-referenced action. I am more than 18 years old and am making this declaration in support of my Motion for Judgment on Verified Petition for Writ of Mandate (“Motion”). The statements below are based on my personal knowledge, except for those stated on information and belief (of which I am informed and believe to be true). If called as a witness, I could and would testify competently about the contents of this declaration.

2. I submit this declaration to respond to two issues Respondents raise in their opposition to the Motion: (1) their suggestion that removing the address redactions appearing in the records disclosed to me would add “only marginal additional value” to information already disclosed because “Cal Poly has already disclosed . . . non-residential, non-chapter house addresses,” thereby giving the incorrect impression that only a “marginal” number or ratio of events feature address redactions; and (2) that the university’s registration of fraternity events “is not approval, and the FSL Office does not approve (or deny) events.”

3. As indicated in the Petition and my prior declaration, California Polytechnic State University, San Luis Obispo (“Cal Poly”) disclosed to me redacted copies of fraternity party-registration forms received by and approved by Cal Poly’s Office of Fraternity & Sorority Life (“FSL Office”) for events held in a portion of 2023 and through all of 2024 and 2025.

4. The records disclosed to me include events registered by sororities affiliated with Panhellenic (“PHA”), cultural and professional fraternity members of the United Sorority & Fraternity Council (“USFC”), and fraternities affiliated with the Interfraternity Council (“IFC”).

5. Based on my review of the records disclosed to me, Cal Poly disclosed 25 event registration forms for events hosted by USFC-affiliated organizations in 2024 and 2025. Of those, Cal Poly redacted address for eight of the events.

//

//

//

6. Based on my review of the records disclosed to me, Cal Poly disclosed records for 437 events registered by PHA-affiliated sororities in 2023 through 2025. Of those events, Cal Poly redacted addresses for 253 of the events (*i.e.*, nearly 58 percent of all registered events).

7. Based on my years of researching the issue and personally experiencing the impact of fraternity parties hosted in City residential areas, IFC-affiliated fraternities have hosted parties in City neighborhoods that are zoned to prohibit fraternity housing and appear to have established fraternity housing in those areas. Based on my review of the records disclosed to me, Cal Poly disclosed records for 738 events registered by IFC-affiliated fraternities from October 2023 through 2025. Cal Poly redacted the addresses of 488 of those events (*i.e.*, 66 percent of all registered events).

8. Cal Poly thus released registration records for 1,200 events and redacted 749 event addresses (*i.e.*, more than 62 percent of all registered events).

9. Many of the registration records Cal Poly disclosed to me reflect discussions between a representative of the FSL Office and the person registered an event, including discussions about whether the FSL Office would approve an event or permit certain changes to its details. True and correct copies of examples of some of the registration forms reflecting such discussions are attached to this declaration as **Reply Exhibit 1**.

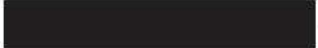
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: July 23, 2026


Kathie Walker

Reply Exhibit 1

FSL Event Registration

 - Tue, Sep 30, 2025 8:26 PM
Fraternity & Sorority Life

Approved

Date: Thu, Oct 2, 2025 1:54 PM

By: 

INSTRUCTIONS

What is the name of your organization/chapter?

 Phi Sigma Kappa

What is your officer position?

 Risk Manager

Phone #:

I will be in attendance at this event and can be reached during the event at the number listed above.

 Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

Love Island

What is the expected attire for members and guests in coordination with name and theme?

Love Island themed costumes based on people in the show

Will alcohol be present at this event?

Yes

DATE AND TIME OF EVENT

Start Date of Event:

10/11/2025

Start Time of Event:

8:00

End Date of Event:

10/11/2025

End Time of Event:

12:00

LOCATION

Where is your event being held?

Residence

Enter the address, building name, and/or venue name of the event location:

GUEST LIST

How many guests are you expecting at your event?

FSL Event Registration Procedure requires a 2:1 (2 guests per 1 member) ratio at events with alcohol.

100

SOBER MONITORS

All events where alcohol is present are required to have sober monitors designated and present.

Reminders:

- Chapters must utilize the [sober monitor template](#) provided by the FSL office.
- All sober monitors must be organization members that are registered through the FSL office.
- Three (3) sober monitors (including one from the executive committee or equivalent) are required at a minimum.

For every 40 guests, invited to the event, an additional sober monitor will be required.

Upload your Sober Monitor list here:



DOWNLOAD FILE

RISK MANAGEMENT PLAN

Upload your approved Risk Management Plan here:



DOWNLOAD FILE

ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

Yes

Discussion

G

[REDACTED]

Write a message



Add an Attachment

CANCEL

POST

M

[REDACTED]

Thu, Oct 9, 2025 11:46 AM

This event has been cancelled

Reply



Elizabeth Aiello-Coppola
Thu, Oct 9, 2025 11:19 AM

so sorry for the miscommunication - this event is actually not approved [redacted]
[redacted], [redacted]
[redacted]

Reply

Your Review

G

[redacted]
Your Vote: None



Reviewers



Voting Reviewers

G

[redacted]
Level 1 Association - Form



Elizabeth Aiello-Coppola
Level 2 Association - Form



FSL Event Registration

 - Sat, Oct 18, 2025 1:44 PM

Fraternity & Sorority Life

Approved

Date: Fri, Oct 24, 2025 11:19 AM

By: Elizabeth Aiello-Coppola

Comment: this registration is accepted. please make sure you are completing the FSL Post-Event Form on cal poly now by wednesday at 12pm. thank you!

INSTRUCTIONS

What is the name of your organization/chapter?

 Zeta Beta Tau

What is your officer position?

 Risk Prevention and Wellness Director

Phone #:

I will be in attendance at this event and can be reached during the event at the number listed above.

 Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

ZBT Halloween party

What is the expected attire for members and guests in coordination with name and theme?

Costumes

Will alcohol be present at this event?

Yes

DATE AND TIME OF EVENT

Start Date of Event:

10/25/2025

Start Time of Event:

9:00

End Date of Event:

10/25/2025

End Time of Event:

12:00

LOCATION

Where is your event being held?

Residence

Enter the address, building name, and/or venue name of the event location:

GUEST LIST

How many guests are you expecting at your event?

FSL Event Registration Procedure requires a 2:1 (2 guests per 1 member) ratio at events with alcohol.

200

SOBER MONITORS

All events where alcohol is present are required to have sober monitors designated and present.

Reminders:

- Chapters must utilize the [sober monitor template](#) provided by the FSL office.
- All sober monitors must be organization members that are registered through the FSL office.
- Three (3) sober monitors (including one from the executive committee or equivalent) are required at a minimum.

For every 40 guests, invited to the event, an additional sober monitor will be required.

Upload your Sober Monitor list here:

n/a

RISK MANAGEMENT PLAN

Upload your approved Risk Management Plan here:

 [DOWNLOAD FILE](#)

ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

Yes

Discussion

G [redacted]

Write a message

 Add an Attachment

CANCEL

POST

G [redacted]
Thu, Oct 23, 2025 12:35 PM

Hi [redacted], you are the only sober monitor on the list not SRMT certified. However, you guys are good in terms of ratio without you on it. **Feel free to sub you out for someone or we can approve it anyway.**

[Reply](#)

R [redacted]
Sun, Oct 19, 2025 3:03 PM

Sober monitor list

 Sober_Monitor_10-25-25.xlsx

[Reply](#)

Your Review

G [redacted]
Your Vote: Approve



Reviewers



Voting Reviewers

G [redacted]



Level 1

Association - Form



Elizabeth Aiello-Coppola

Level 2

Association - Form

FSL Event Registration

 - Mon, Apr 7, 2025 8:36 PM

Fraternity & Sorority Life

Approved

Date: Fri, May 9, 2025 10:03 AM

By: Elizabeth Aiello-Coppola

Comment: this event registration is accepted. don't forget to submit the post-event form by Wednesday at 12pm. thank you!

INSTRUCTIONS

What is the name of your organization/chapter?

☐ Phi Gamma Delta

What is your officer position?

☐ Risk Manager

Phone #:

☐ 

I will be in attendance at this event and can be reached during the event at the number listed above.

☐ Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

Name: Beach Party. Theme: Guests dress like they're going to the beach, so for example, Hawaiian shirts and trunks.

What is the expected attire for members and guests in coordination with name and theme?

Appropriate, non-offensive attire

Will alcohol be present at this event?

Yes

DATE AND TIME OF EVENT

Start Date of Event:

05/09/2025

Start Time of Event:

9:00

End Date of Event:

05/10/2025

End Time of Event:

1:00

LOCATION

Where is your event being held?

Residence

Enter the address, building name, and/or venue name of the event location:

[REDACTED]

GUEST LIST

How many guests are you expecting at your event?

FSL Event Registration Procedure requires a 2:1 (2 guests per 1 member) ratio at events with alcohol.

35

SOBER MONITORS

All events where alcohol is present are required to have sober monitors designated and present.

Reminders:

- Chapters must utilize the [sober monitor template](#) provided by the FSL office.
- All sober monitors must be organization members that are registered through the FSL office.
- Three (3) sober monitors (including one from the executive committee or equivalent) are required at a minimum.

For every 40 guests, invited to the event, an additional sober monitor will be required.

Upload your Sober Monitor list here:

n/a

RISK MANAGEMENT PLAN

Upload your approved Risk Management Plan here:



DOWNLOAD FILE

ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

Yes

Discussion

G



Write a message

 Add an Attachment

CANCEL

POST

T

Thu, May 8, 2025 10:30 AM

Attached below is the sober monitor list for this event. Thank you!

 [Phi_Gamma_Delta_Sober_Monitor_List_05_09_2025_\(1\).xlsx](#)

[Reply](#)

T

Thu, May 8, 2025 10:28 AM

With permission, we would like to change the theme for this event to "Miami Vice". Members and guests are encouraged to dress in retro / beach outfits.

[Reply](#)



Thu, May 8, 2025 10:42 AM

permission granted!

Your Review

G

Your Vote: None



Reviewers



Voting Reviewers

G

Level 1

Association - Form

M

Level 1

Association - Form

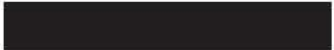
Elizabeth Aiello-Coppola

Level 2

Association - Form



FSL Event Registration

 - Tue, Feb 4, 2025 9:48 AM
Fraternity & Sorority Life

Approved

Date: Fri, Feb 7, 2025 10:44 AM

By: Elizabeth Aiello-Coppola

Comment: This event registration is approved. Don't forget to submit the post-event form by Wednesday at 12pm.

INSTRUCTIONS

What is the name of your organization/chapter?

 Phi Kappa Psi

What is your officer position?

 Seragent at Arms

Phone #:



I will be in attendance at this event and can be reached during the event at the number listed above.

 Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

dynamite

What is the expected attire for members and guests in coordination with name and theme?

black and red

Will alcohol be present at this event?

Yes

DATE AND TIME OF EVENT

Start Date of Event:

2/8/2025

Start Time of Event:

8:00

End Date of Event:

2/9/2025

End Time of Event:

1:00

LOCATION

Where is your event being held?

Enter the address, building name, and/or venue name of the event location:

1335 Est Foothill Blvd

GUEST LIST

How many guests are you expecting at your event?

FSL Event Registration Procedure requires a 2:1 (2 guests per 1 member) ratio at events with alcohol.

100

SOBER MONITORS

All events where alcohol is present are required to have sober monitors designated and present.

Reminders:

- Chapters must utilize the [sober monitor template](#) provided by the FSL office.
- All sober monitors must be organization members that are registered through the FSL office.
- Three (3) sober monitors (including one from the executive committee or equivalent) are required at a minimum.

For every 40 guests, invited to the event, an additional sober monitor will be required.

Upload your Sober Monitor list here:



DOWNLOAD FILE

RISK MANAGEMENT PLAN

Upload your approved Risk Management Plan here:



DOWNLOAD FILE

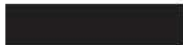
ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

Yes

Discussion

G



Write a message



Add an Attachment

CANCEL

POST



Elizabeth Aiello-Coppola

Fri, Feb 7, 2025 10:44 AM

events with alcohol need to be submitted 10 days before the event takes place! Anything later than 5 days I can't approve. **This time will be a warning, but in the future I cannot approve this.** Thank you!

[Reply](#)

Your Review

G

Your Vote: None

Reviewers

Voting Reviewers

G

Level 1

Association - Form

M

Level 1

Association - Form



Elizabeth Aiello-Coppola

Level 2

Association - Form

FSL Event Registration

 - Wed, Jan 29, 2025 6:15 PM

Fraternity & Sorority Life

Approved

Date: Fri, Feb 7, 2025 10:14 AM

By: Elizabeth Aiello-Coppola

Comment: This event registration is approved. Don't forget to submit the post-event form by Wednesday at 12pm.

INSTRUCTIONS

What is the name of your organization/chapter?

 Lambda Chi Alpha

What is your officer position?

 Risk Manager

Phone #:

I will be in attendance at this event and can be reached during the event at the number listed above.

 Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

Pinning Party, Black tie/Formal

What is the expected attire for members and guests in coordination with name and theme?

Formal attire

Will alcohol be present at this event?

Yes

DATE AND TIME OF EVENT

Start Date of Event:

2/8/2025

Start Time of Event:

8:00

End Date of Event:

2/8/2025

End Time of Event:

11:30

LOCATION

Where is your event being held?

Enter the address, building name, and/or venue name of the event location:

1264 E Foothill Blvd

GUEST LIST

How many guests are you expecting at your event?

FSL Event Registration Procedure requires a 2:1 (2 guests per 1 member) ratio at events with alcohol.

200

SOBER MONITORS

All events where alcohol is present are required to have sober monitors designated and present.

Reminders:

- Chapters must utilize the [sober monitor template](#) provided by the FSL office.
- All sober monitors must be organization members that are registered through the FSL office.
- Three (3) sober monitors (including one from the executive committee or equivalent) are required at a minimum.

For every 40 guests, invited to the event, an additional sober monitor will be required.

Upload your Sober Monitor list here:



DOWNLOAD FILE

RISK MANAGEMENT PLAN

Upload your approved Risk Management Plan here:



DOWNLOAD FILE

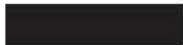
ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

Yes

Discussion

G



Write a message



Add an Attachment

CANCEL

POST



Elizabeth Aiello-Coppola

Fri, Feb 7, 2025 10:14 AM

in the future we cannot approve an event called 'Pinning Party' - it implies alcohol involvement with new members which is against policy

Reply

Your Review

G

Your Vote: None

Reviewers

Voting Reviewers

G

Level 1

Association - Form

M

Level 1

Association - Form

Elizabeth Aiello-Coppola

Level 2

Association - Form

FSL Event Registration

 - Mon, Oct 7, 2024 10:45 AM

Fraternity & Sorority Life

Approved

Date: Thu, Oct 17, 2024 11:00 PM

By: Elizabeth Aiello-Coppola

INSTRUCTIONS

What is the name of your organization/chapter?

 Delta Chi

What is your officer position?

 Risk Management (F)

Phone #:



I will be in attendance at this event and can be reached during the event at the number listed above.

 Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

☐ DX x APHI Country Dinner

What is the expected attire for members and guests in coordination with name and theme?

☐ Country/Denim

Will alcohol be present at this event?

☐ No

DATE AND TIME OF EVENT

Start Date of Event:

☐ 10/18/2024

Start Time of Event:

☐ 7:00

End Date of Event:

☐ 10/18/2024

End Time of Event:

☐ 8:00

LOCATION

Where is your event being held?

☐ Chapter Facility

Enter the address, building name, and/or venue name of the event location:

☐ 1236 Monte Vista Pl

ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

☐ Yes

Discussion

G 

Write a message

 [Add an Attachment](#)

[CANCEL](#)



Elizabeth Aiello-Coppola
Thu, Oct 17, 2024 10:20 PM

I need Alpha Phi to submit their form for this before I can approve it!

[Reply](#)

Your Review

G

Your Vote: None

Reviewers

Voting Reviewers

G

Level 1

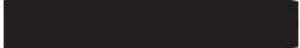
Association - Form

Elizabeth Aiello-Coppola

Level 2

Association - Form

FSL Event Registration

 - Thu, Feb 15, 2024 1:42 PM

Fraternity & Sorority Life

Approved

Date: Fri, Feb 23, 2024 10:16 AM

By: Elizabeth Aiello-Coppola

INSTRUCTIONS

What is the name of your organization/chapter?

 Kappa Sigma

What is your officer position?

 Risk Management

Phone #:

I will be in attendance at this event and can be reached during the event at the number listed above.

 Yes

EVENT TITLE AND THEME

What is the name and theme of your event?

Welcome to the Jungle

What is the expected attire for members and guests in coordination with name and theme?

Jungle theme

Will alcohol be present at this event?

Yes

DATE AND TIME OF EVENT

Start Date of Event:

2/24/2024

Start Time of Event:

2:00

End Date of Event:

2/24/2024

End Time of Event:

4:00

LOCATION

Where is your event being held?

Satellite House

Enter the address, building name, and/or venue name of the event location:

SOBER MONITORS

All events where alcohol is present are required to have sober monitors designated and present.

Reminders:

- Chapters must utilize the [sober monitor template](#) provided by the FSL office.
- All sober monitors must be organization members that are registered through the FSL office.
- Three (3) sober monitors (including one from the executive committee or equivalent) are required at a minimum.

For every 40 guests, invited to the event, an additional sober monitor will be required.

Upload your Sober Monitor list here:

n/a

RISK MANAGEMENT PLAN

Upload your approved Risk Management Plan here:



DOWNLOAD FILE

ACKNOWLEDGEMENT

I acknowledge that all answers and documents are both accurate and factual.

☐ Yes

Discussion

G

[REDACTED]

Write a message



Add an Attachment

CANCEL

POST

C

[REDACTED]

Thu, Feb 22, 2024 4:25 PM

Hey [REDACTED] haven't attended srmt or at least got an 8 out of 10. Without them though you are still good.

[Reply](#)

N

[REDACTED]

Thu, Feb 22, 2024 2:34 PM

Sober Monitors

 2_24_2024_Kappa_Sigma_Sober_Monitors.xlsx_-_Sober_Monitor.pdf

Reply

N

Thu, Feb 22, 2024 1:40 PM

Here is the guest list!

 2_24_2024_Kappa_Sigma_Guest_List_-_Sheet1.pdf

Reply

N

Thu, Feb 15, 2024 1:42 PM

Hey yall,

I was hoping since I registered this and decided not to go through with it, we just rescheduled today to next weekend, I know its 9 days early and not 10 but we just moved the date right now. **We will cancel and not have the event if the \$100 dollar fine will be incurred.**

Reply



Elizabeth Aiello-Coppola

Thu, Feb 22, 2024 1:37 PM

you are good, thank you

Your Review

G

Your Vote: None



Reviewers



Voting Reviewers

C



Level 1

Association - Form



G



Level 1

Association - Form



Elizabeth Aiello-Coppola

Level 2

Association - Form

