

1 Kian Bidari  
ICC Co-Chair  
2 Mount San Antonio Associated Students  
Email: kbidari@student.mtsac.edu

3 Authors of Complaint

4 MOUNT SAN ANTONIO COMMUNITY COLLEGE ASSOCIATED STUDENTS  
5 SENATE

6  
7 KIAN BIDARI

8 Plaintiff

9 vs.

10 SHAILAH ARREOLA BITTNER

11 Defendant

) **COMPLAINT; MOTION FOR  
IMPEACHMENT**

- ) **1. Bullying and Intimidation**  
) **2. Slander**  
) **3. Persistent Misconduct**  
) **4. Harassment**  
) **5. Dishonesty**  
) **6. Violation of the Brown Act**  
) **7. Breach of Contract**

) **PCS Report #: 20S-00060**  
)

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14  
15 **I. PRELIMINARY STATEMENT**

16 Shailah Arreola Bittner serves as the Mount SAC Academic Senator and has held that position  
17 from the beginning of Fall 2019 and until the end of Spring 2020. Shailah ran as a candidate for Mount  
18 SAC Student Trustee. This Complaint alleges, during her appointment as Academic Senator, Shailah  
19 violated multiple Mount SAC Associated Students rules and codes, ranging from the A.S. Constitution  
20 and, as reported to Police and Campus Safety, standards of conduct. Each cause of action will be  
21 referenced to which document and section it pertains to.  
22

23 **II. JURISDICTION AND VENUE**

24 This Senate has subject matter jurisdiction to hear this Complaint, as:

25  
26 Mount SAC AS Organizational Directive Section V, Sub-  
27 section Motion of Impeachment, sub-point D: "The motion of  
28 Impeachment Process is an action item and there will be a motion and a  
second. Then the assembly will be voting to see if the grievance merits

1 an Impeachment Process. The assembly is not voting whether the  
2 individual is guilty or not.”

3 Mount SAC AS Organizational Directive Section V,  
4 Sub-section Motion of Impeachment, sub-point E: “The  
5 assembly will have no discussion and will go straight to the  
6 vote.”

7 Mount SAC AS Organizational Directive Section V,  
8 Sub-section Motion of Impeachment, sub-point F: “Upon an  
9 approval by a majority vote of the Senate, the impeachment  
10 proceedings will proceed.”

11 Clearly through our A.S. Constitution and Organizational Directive, this Senate body has not  
12 only the authority, but the duty to hold members of our institution to the outlined criteria. This Senate  
13 body has the ability to pass a Motion for Impeachment. This section shall affirm this Senate’s ability  
14 to review violations and deem them worth of administration of relief, within our association. All  
15 alleged violations of Mount SAC Standards of Conduct have been reported to Police and Campus  
16 Safety (PCS report #20S-00060) and there is an ongoing investigation per AP 5520.

17 **III. FIRST CAUSE OF ACTION:**  
18 **BULLYING AND INTIMIDATION**

19 Mount SAC Standards of Conduct; Section 10. “Engaging in  
20 intimidating conduct or bullying against another student through words  
21 or actions.”

22 This allegation has been reported (PCS report #20S-00060) and there is an ongoing  
23 investigation per AP 5520. Shailah, throughout the course of her campaign, has sent demeaning,  
24 abusive, and obscene messages to Sophia Ruiz (active Publicity Senator and former Student Trustee  
25 Candidate). In the messages, Shailah harassed Sophia for reporting Shailah’s abuses to the A.S.  
26 Advisors, calling her, “petty and childish.” Shailah then blames Sophia for the actions that Shailah  
27 has done that Sophia reported by further harassing and saying, “You have proven that you will be  
28 the first to pull all this unnecessary bullshit. So let me give you a little advise so you don’t continue  
embarrassing yourself in the future, next time you want to strike out against people you feel like  
have wronged you, try thinking long and hard about that because if you do, you’ll likely find that

1 you have no one to blame but yourself.” (these messages will be attached as the first exhibit).  
2

3 **IV. SECOND CAUSE OF ACTION**

4 **SLANDER**

5 Mount Sac Standards of Conduct; Section 17 in pertinent part.  
6 “Engaging in expression which is...libelous or slanderous.”

7 Mount SAC Standards of Conduct, Section 21. “Violation of  
8 College rules and regulations including those concerning affiliate clubs  
9 and organizations, the use of College facilities, the posting and  
distribution of written materials, and College safety procedures.”

10 AS Student Life Center Office Culture Norms Section 4, sub-  
11 section a: “Respect colleagues.”

12 AS Student Life Center Office Culture Norms Section 4, sub-  
13 section a: “Be professional.”

14 This allegation has been reported (PCS report #20S-00060) and there is an ongoing  
15 investigation per AP 5520. Shailah, during her campaign, has asked for the endorsements of multiple  
16 RSCOs (recognized student clubs and organizations). In one known case, Shailah asked the  
17 “Philosophy Club” for an endorsement. The club responded by saying they would not be endorsing  
18 any candidate, but they would announce the AS elections. Shailah then contacted Elena Pogosova,  
19 the ex-president of the Philosophy Club (no longer a student of Mount SAC) for an endorsement.  
20 Elena then posted an endorsement onto the Philosophy Club Facebook page, to which Valeria (the  
21 current Philosophy Club president) and no other current club members, officers, or advisors have  
22 access to. Valeria then messaged Shailah, letting Shailah know that the Philosophy Club does not  
23 endorse Shailah and to remove the post. Shailah, after multiple requests, did not comply until Valeria  
24 emailed Giovanni Rodriguez, AS Advisor, and informed him of the facts. Giovanni Rodriguez found  
25 that Shailah should remove the endorsement. Shailah has not apologized or released a statement  
26 pertaining to the removal of the post. (Please see correspondence between current Philosophy Club  
27 President and Shailah attached as the second exhibit; please see social media posting of Philosophy  
28

1 Club endorsement attached as the third exhibit.)

2 **V. THIRD CAUSE OF ACTION**

3 **PERSISTENT MISCONDUCT**

4  
5 Mount SAC Standards of Conduct; Section 18. “Persistent,  
6 serious misconduct where other means of correction have failed to bring  
7 about proper conduct.”

8 A.S. Constitution Article 3, Section 4: “No elected or appointed  
9 officer of this Association shall hold two offices at the same time. This  
10 includes serving as an officer in a campus club (as recognized by Inter-  
11 Club Council) or campus organization.”

12 Mount SAC A.S. Officer Duties and Responsibilities Agreement  
13 conditions for Public Servant Leader Role 5: “Disclose all conflict(s) of  
14 interest circumstances that pertain to this position.”

15 This allegation has been reported (PCS report #20S-00060) and there is an ongoing  
16 investigation per AP 5520. Although attending the Cal Poly Leadership Training in Fall of 2019,  
17 where multiple times, AS Advisor Andi Sims has stated clearly that you may not serve as a member  
18 of Associated Students and as an officer of a RSCO (recognized student club or organization),  
19 Shailah still kept her position as an officer of PTK and as the Academic Senator of A.S.

20 Shailah had the intent of breaking such a law, as Amy Truong, Claudia Fierros, and Kian  
21 Bidari have witnessed a conversation in the Associated Students office, where Shailah interacted  
22 with a former member of our Association (please see signed declarations by Amy Truong, Claudia  
23 Fierros, and Kian Bidari attached as exhibit 4).

24 Shailah, after multiple times of being reminded of our rules, has broken them, time and time  
25 again, and has used semantic arguments to try and justify her wrong doings. She has no respect for  
26 the real meaning of the rules of our association and has shown to do everything in her power to view  
27 these rules not as moral codes but things to get around.

28 After reviewing this case, the Student Court made a Preliminary Opinion (Advisory Opinion)  
which found that student officers may not serve both as an A.S. Officer and an RSCO Officer

1 concurrently.

2 **VI. FOURTH CAUSE OF ACTION**  
3 **HARASSMENT**

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5 Mount SAC Standards of Conduct; Section 20. “Harassment of  
6 students and/or College employees that creates an intimidating, hostile,  
7 or offensive environment.”

8 This allegation has been reported (PCS report #20S-00060) and there is an ongoing  
9 investigation per AP 5520. Shailah has bullied and intimidated Sophia, saying, “Instead of handling  
10 it maturely, you decided to be petty and childish, and you tried to essentially get all of us kicked out  
11 because you were angry that you weren’t allowed to make it seem like you had the candidates  
12 endorsing you when in reality you have no support” (these messages will be attached as the first  
13 exhibit). Here, Shailah is referring to the fact that Sophia reported to the A.S. Advisors the malicious  
14 and slanderous acts Shailah had committed in the 2020 A.S. Elections.

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16 **VII. FIFTH CAUSE OF ACTION**  
17 **DISHONESTY**

18  
19 Mount SAC Standards of Conduct; Section 14. “Dishonesty;  
20 forgery; alteration or misuse of College documents, records or  
21 identification; or knowingly furnishing false information to the  
22 College.”

23 This allegation has been reported (PCS report #20S-00060) and there is an ongoing  
24 investigation per AP 5520. During the interview process of Shailah for the position of interim Vice-  
25 President of Associated Students, when questioned what she had done during her appointment as  
26 Academic Senator, she said, “I am working with Aya on a STEM survey,” and went on to explain  
27 in great detail the purpose of the survey and how she had been working with Aya to complete it.  
28 According to Aya, Shailah was immaterial, insignificant, and dishonest when she had said to all of

1 the Associated Students that she had helped Aya, in an attempt for the Associated Students to vote  
2 for Shailah for Vice-President (please see Declaration of Aya Garawi attached as exhibit 5).

3 **VIII. SIXTH CAUSE OF ACTION**

4 **VIOLATION OF THE BROWN ACT**

5  
6 Mount SAC A.S. Constitution Article IV, Section 1 (in pertinent  
7 part): “In all cases Associated Students will comply with the most  
8 current open meeting laws for the state of California [note: the Brown  
9 Act is part of open meeting laws for the state of California].”

10 California Government Code (the Brown Act) §54952.2.(b)(1):  
11 A majority of the members of a legislative body shall not, outside a  
12 meeting authorized by this chapter, use a series of communications of  
13 any kind, directly or through intermediaries, to discuss, deliberate, or  
14 take action on any item of business that is within the subject matter  
15 jurisdiction of the legislative body.

16 Shailah has posted, in full view of both every member of Associated Students and the public,  
17 a post of Facebook, with a complaint (please see Shailah’s Facebook post and attachment, attached  
18 as exhibit 6). This complaint was later filed with Associated Students, making it an action item.  
19 Shailah, in the same Facebook post, said, “As I said before, my full complaint is attached below and  
20 I’d really appreciate if you’d give it a read as well as extend any support you are willing to give  
21 during this tough time.” Here she is asking for feedback and input, which is a violation of the Brown  
22 Act.

23 **IX. SEVENTH CAUSE OF ACTION**

24 **BREACH OF CONTRACT**

25 Mount SAC A.S. Officer Duties and Responsibilities Agreement  
26 conditions for Public Servant Leader Role 9: “Utilize the A.S. leader  
27 office for official A.S. business and uphold the established Student Life  
28 Center Office Culture Norms”

Mount SAC A.S. Student Life Center Office Culture Norms  
Section 4, Sub-section A: “Respect Colleagues.”

1 Mount SAC A.S. Student Life Center Office Culture Norms  
2 Section 4, Sub-section A: "Be professional."

3  
4 As A.S. officers it is our duty to uphold the student body in every possible way. This includes  
5 harnessing student's sentiments through legislation and defending their ability to elect their own  
6 student leaders and at the very minimum to be professional and to respect colleagues. Shailah  
7 attacked the integrity of our elections and our association by forgoing these rules and morals (please  
8 see Officer Duties and Responsibilities agreement with Student Life Center Office Culture Norms  
9 attached as Exhibit 7).

10 The Student Court has stated that Shailah's claims are unfounded and that no violations were  
11 committed by Sophia or her campaign. Shailah formed a baseless and malicious complaint, with no  
12 substance, in an attempt to appeal the democratic system we have put in place.

13 Associated Student's goals and laws hammer in on the fact that students get to choose their  
14 own leaders. Through her bad-faith, Shailah has shown she believes leaders get to choose  
15 themselves, through manipulation of both our systems and our officers. It is the will of the students  
16 that drives A.S. forward, not self-interest.

17  
18 **REMEDIES SOUGHT**

19 **WHEREFORE**, Plaintiff respectfully seeks for judgment against Defendant as  
20 follows:

- 21 1. This Senate to order a Motion for Impeachment of Defendant;
- 22 2. Defendant be removed from their Mount SAC Associated Students  
23 officer position in the term of Spring 2020;
- 24 3. Defendant be barred from running, applying, campaigning, and/or  
25 becoming a Mount SAC Associated Students Officer for one year from  
26 the date such a judgement and subsequent order be made;
- 27 4. Defendant be barred from running, applying, campaigning, and/or  
28 becoming a Mount SAC RSCO officer (as outlined in a RSCO's

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constitution under the “Officers” section) for one year from the date such a judgement and subsequent order be made;

- 5. The Senate to seek remedies they have determined to bring relief for Associated Students and victims;
- 6. Associated Students has been harmed as a result of Defendant’s actions.

April 30, 2020

*Kian Bidari*  
Kian Bidari  
Plaintiff  
ICC Co-Chair

# EXHIBIT 1

< 110



Shailah PTK >

Sun, Mar 29, 11:27 AM



Hey Shailah! Was hoping we can keep this a clean race by not slandering/ metal. I can only hope this is the only message to prevent that again.. Best of luck to you as a candidate and friend 😊

Sun, Mar 29, 2:19 PM

I agree, that's why everything that I've done, and will continue to do, is perfectly within the bounds of the rules. Best of luck to you, and may the best candidate win.

rules aside, i was coming from it in general 🙄🙏 ... Thank you

Friday 3:35 PM

Okay, let me make something very

Subject  
iMessage



< 110



Shailah PTK >

rules aside, i was coming from it in general 😊🙌 ... Thank you

Friday 3:35 PM

Okay, let me make something very clear to you. You were struck with copy right infringement on IG because Angeline was angry at you because you decided to make a post that made it seem like you were running in conjunction with people who have endorsed me, not you. Which was already a little low to begin with because I am the person who made sure all of them ended up running not you, so you have no right to make it seem like you are all on the same team.

Then, instead of handling it maturely you decided to be petty and childish, and you tried to essentially get all of us kicked out

Subject

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iMessage



Please



Shailah PTK >

Then, instead of handling it maturely you decided to be petty and childish, and you tried to essentially get all of us kicked out because you were angry that you weren't allowed to make it seem like you had candidates endorsing you when in reality you have no support.

And lastly for someone who talks such a big game about running a clean campaign, you have proven that you will be the first to pull all this unnecessary bullshit. So let me give a little advice so you don't continue embarrassing yourself in the future, next time you want to strike out against people you feel like have wronged you, try thinking long and hard about that because if you do, you'll likely find that you have no one to blame but yourself.

Subject  
iMessage



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Shailah PTK &gt;

such a big game about running a clean campaign, you have proven that you will be the first to pull all this unnecessary bullshit. So let me give a little advice so you don't continue embarrassing yourself in the future, next time you want to strike out against people you feel like have wronged you, try thinking long and hard about that because if you do, you'll likely find that you have no one to blame but yourself.

My intent was to understand. I was asking what I was doing wrong. And Gio helped me understand that. Under no way was I trying to hurt anyone. I truly thought I was just helping others. I didn't know your headshots were designed by someone else and I did not anticipate what happened next.

I apologize.

Subject

iMessage



# EXHIBIT 2

**shailah\_a.b**

Active 30m ago



Hi this is Valeria the current Mt.SAC Philosophy Club president, please remove this post from your Facebook and instagram as it is a false endorsement from the Philosophy Club. This individual is no longer a Mountie, therefore does not have any involvement with the current philosophy club or student life to say the least. My officers and I have decided not to endorse anyone, but rather only encourage our members to vote as I previously stated. Thank you.

I didn't say it was an endorse from the philosophy club. I just reposted an endorsement from someone who used to go to Mt. SAC which is something I'm allowed to do. That's all.

\*endorsement



Message...



**shailah\_a.b**

Active now



Philosophy Club. This individual is no longer a Mountie, therefore does not have any involvement with the current philosophy club or student life to say the least. My officers and I have decided not to endorse anyone, but rather only encourage our members to vote as I previously stated. Thank you.

I didn't say it was an endorse from the philosophy club. I just reposted an endorsement from someone who used to go to Mt. SAC which is something I'm allowed to do. That's all.

\*endorsement

If it's just an endorsement from someone who used to go to Mt.SAC then why did they have to endorse you from a Facebook page called Mt. SAC Philosophy Club from years ago, that does not belong to our current club?

Seen



Message...



**shailah\_a.b**

Active now



Mt.SAC then why did they have to endorse you from a Facebook page called Mt. SAC Philosophy Club from years ago, that does not belong to our current club?

To be fair, I have no control over where Elena posts her support and I don't think she intended to act as though she was. In my eyes she was just posting about her supporting us in a group that she helped create and therefore where her opinion might hold some sway. I personally never intended to imply that I was endorsed by you guys which is why I didn't make an official post about it, I was just posting about her endorsement because I thought it was sweet. I'm sorry there was a misunderstanding about that.

Regardless, I hope you guys are doing well during these times and I look forward to working with you guys in the future.



Message...



# EXHIBIT 3



Shailah Arreola-Bittner

2 hrs · 🌐



Shailah endorses:

- Hugo Fulcheri for President
- Courtney Darcy for ICC Co-Chair
- Erick Chavez for ICC Co-Chair

*For equity and representation*

**Shailah Arreola-Bittner**

★ **for Student Trustee** ★

of Mt. San Antonio College



Courtney endorses:

- Shailah Arreola-Bittner for Student Trustee
- Hugo Fulcheri for President
- Erick Chavez for ICC Co-Chair

*Representing clubs on campus*

**Courtney Darcy**

★ **for ICC Co-Chair** ★

of Mt. SAC Associated Students



Hugo endorses:

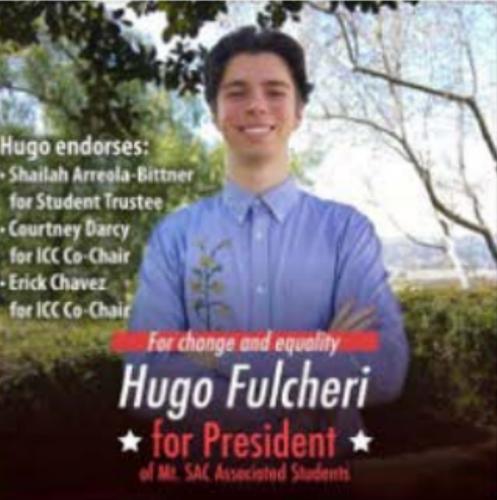
- Shailah Arreola-Bittner for Student Trustee
- Courtney Darcy for ICC Co-Chair
- Erick Chavez for ICC Co-Chair

*For change and equality*

**Hugo Fulcheri**

★ **for President** ★

of Mt. SAC Associated Students



Erick endorses:

- Shailah Arreola-Bittner for Student Trustee
- Courtney Darcy for ICC Co-Chair
- Hugo Fulcheri for President

*Representing clubs on campus*

**Erick Chavez**

★ **for ICC Co-Chair** ★

of Mt. SAC Associated Students



Elena Pogosova ▸ Mt.Sac Philosophy Club

April 4 at 12:43 PM

Hey everyone 🙌 Elena here! I've founded philosophy club to promote awareness on philosophy as an academic discipline and to promote open conversations with like-minded individuals, and I'm really happy to see how far it has gone.

Please vote for great folks below! I trust that they have the leadership experience to be your next student government!

#vote

📍 Gabriel Alfaro and 1 other

👍 Like

💬 Comment

➦ Share



Write a comment...



# EXHIBIT 4

Section 1:

Conversation best recalled by Kian Bidari

Shailah: "I'm a little scared that Advisor Andi will find out that I'm also a PTK officer."

Former officer: "Aw do not worry, people have done it before and nothing has happened."

Shailah: "Are you sure because she made it a deal to say you cannot serve as both."

Former officer: "You'll be fine, c'mon, I promise you nothing has ever happened."

Shailah: "Okay, okay this can be our secret between us. It won't hurt anyone. Thank you [Former Officer]."

I am over 18 and I have recalled, to the best of my ability, the conversation between Shailah Areola Bittner and the former officer. My recollection is found solely in Section 1, and other recollections are not a reflection, interpretation, or impress my own personal recollection. I have written, edited, and produced my own recollection, to which no one else changed, edited, modified, retracted, and/or added to. Other recollections have not influenced my own remembrance of the conversation. The matter and subject of these recollections are truthful and accurate.

*Kian Bidari* \_\_\_\_\_

Kian Bidari

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Section 2:

Conversation best recalled by Amy Truong

Sh: "I'm a little scared that our AS Advisor, Andi Sims, would find out that I am a PTK officer."

Fo: "We had this happened before, nothing really happens here in AS. You are good"

Sh: "Yeah maybe you're right."

Either she said "This isn't a big deal anyway." or "Yeah, you're right. This can be a secret between all of us. It won't hurt anyone." And then she smiles and chuckles.

I am over 18 and I have recalled, to the best of my ability, the conversation between Shailah Areola Bittner and the former officer. My recollection is found solely in Section 2, and other

recollections are not a reflection, interpretation, or impress my own personal recollection. I have written, edited, and produced my own recollection, to which no one else changed, edited, modified, retracted, and/or added to. Other recollections have not influenced my own remembrance of the conversation. The matter and subject of these recollections are truthful and accurate.

Amy Truong

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Amy Truong

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Section 3:  
Conversation best recalled by Claudia Fierros

Shailah: I'm a little scared that Andi will find out that I'm a PTK officer

Former O: Don't worry about it they won't find out it has happened before and nothing has happened.

Shailah: Are you sure because they made a big deal out of not being able to serve as both

Former O: Yes don't worry about it just don't mention it to them and they won't find out.

Shailah: Oh ok, I guess that's fine it can be a secret between all of us.

I am over 18 and I have recalled, to the best of my ability, the conversation between Shailah Areola Bittner and the former officer. My recollection is found solely in Section 3, and other recollections are not a reflection, interpretation, or impress my own personal recollection. I have written, edited, and produced my own recollection, to which no one else changed, edited, modified, retracted, and/or added to. Other recollections have not influenced my own remembrance of the conversation. The matter and subject of these recollections are truthful and accurate.

Claudia Fierros

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Claudia Fierros

# EXHIBIT 5

## Declaration of Aya Garawi

1. My name is Aya Garawi, I am above 18 years old, and I currently serve as the STEM Senator for Mt. SAC Associated Students.
2. I declare that back when Shailah ran for AS Vice President, during the election day she and Andy, the other Vice President candidate, were asked of things they've accomplished so far in their respected Senate positions. Shailah mentioned that she had been "working with Aya to create a STEM survey, adapting to STEM students' needs" and went on to talk about the reasoning behind the STEM survey 'we' were conducting. Now, unfortunately due to unavailabilities and time restrictions on our schedules, James Reed (the STEM center coordinator) and I were not able to go through with the survey, and it was never given to students. However, I was able to meet with him, think of ideas, and ultimately submit a final edited document of the survey. At the beginning of the Fall semester, Shailah had approached me after I mentioned in one of our senate meetings that I was working on a survey with James, asking me how she could be involved. I gladly gave her the opportunity to be a part of this with me. We had almost one full conversation (with other small talk, that didn't accomplish or establish much) where she let me know her ideas, said that we should include a professor, Beta Meyers, and I asked for her schedule in order to find a time we could work on the survey with the two respected faculty members, and that was pretty much the bulk of the conversation. Other included ideas of questions that we both contributed to. I had sent her multiple emails, forwarded her emails from James and I, texted her for her availability when a convenient time had come and sent her the document James had emailed me, so that we both could edit and or add to it. She had never edited the document, though I had reminded her in person and sent her emails. She didn't make much effort to find a time we could all meet and talk about the survey. Most of the communication for availability had been between James and I. It came to a point where I just thought she had lost interest and didn't want to be a part of it, so I didn't make any effort to contact her about it. Therefore, I was a bit shocked to hear her response on the day of the AS Vice President election. She had made it seem that she worked on this survey with me, when in reality, the majority of the physical work was something I had done. Ultimately trying to convince the AS advisors and AS leaders to think that she had been a major contributor to this project, using my efforts to benefit her reputation as Academic Senator and ultimately using this as a possible way to earn the AS Vice President position.
3. The entirety of this declaration, including but not limited to the statement included in section 2 of my declaration, is true and accurate to the best of my ability to recall the subject of this declaration.

Aya Garawi

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Aya Garawi

# EXHIBIT 6

Shailah Arreola-Bittner Timeline Recent Add Friend

### Intro

Please vote for me for Mt. SAC Student Trustee! Voting is from April 6th-April 9th on your portal.

- Academic Senator at Associated Students of Mt. San Antonio College
- Former Vice President of Service at Phi Theta Kappa - Alpha Omega Alpha Chapter
- Former Inter- Club Council Representative at Mt. SAC EAGLE
- Studies Environmental Science at Mt. SAC
- Went to Davis Senior High School
- Lives in Hacienda Heights, California
- From Davis, California
- In a relationship with Gabriel Alfaro
- Joined May 2018

### Photos

### Friends · 230

Like Comment Share

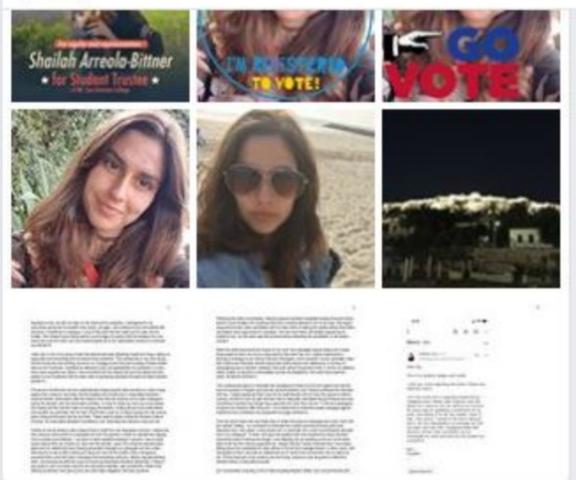
Write a comment... Press Enter to post.

**Shailah Arreola-Bittner**  
April 20 at 2:00 AM · 🌐

I took my time coming out with this post because I wanted to make sure that whatever I said would be me doing right by mental health and my values. Which is why I decided to put my story out there, in the name of full transparency, and because I believe student leaders should be held accountable for their actions, I have decided to come forward with what I believe to be bullying, slander and harassment by one of my opponents, Sophia Ruiz, against me to win the Student Trustee election. I have attached my complaint for those of you who want to read it.

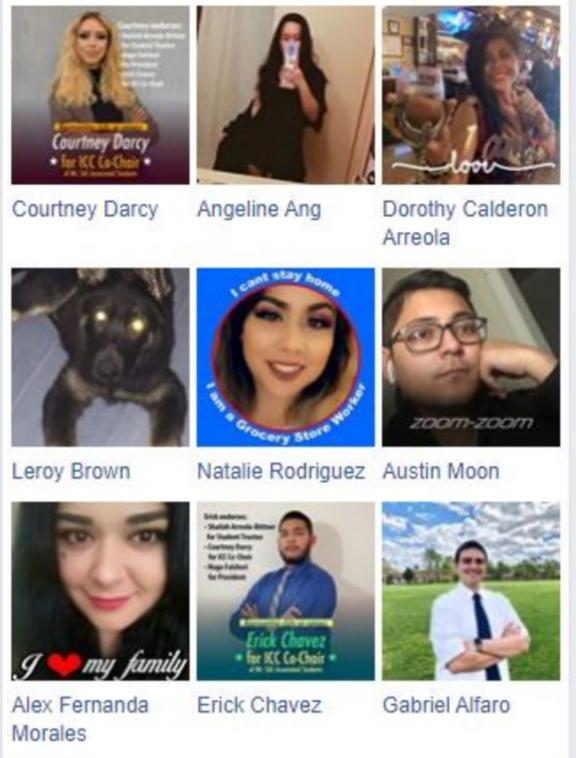
For those that do not, I just want to say, people talk a lot about how they are willing to do whatever it takes to win, yet once you have someone who actually uses every possible opportunity to ruin your reputation in the name of winning the true meaning of that statement is revealed as something far uglier than you could ever imagine. It means winning without being conscious of the isolation and emotional turmoil you are causing by exploiting every possible opportunity to tear down your colleague with lies. Through threatening texts condemning me for things I hadn't done, to almost forcing me to have my campaign material removed due to false copyright claims, to distributing a text message maliciously edited to mislead and manipulate my colleagues, as well as the students at large, through a smear campaign meant to ruin my reputation, Sophia Ruiz proved to me that she was more than willing to wield the dirtiest bullying tactics to win at all cost, rules be damned. However I myself believe that our student leaders should be held to a higher standard which is why I'm pushing forward with a complaint to Student Court, given that the Student Code of Conduct has rules that prohibits bullying, slander and harassment, all of which I believe she has violated. I recognize that by ensuring my voice is heard I risk retaliation in the form of my post being flagged because by reclaiming my narrative I have exposed an ugly truth that others may want to keep hidden. As I said before, my full complaint is attached below and I'd really appreciate if you'd give it a read as well as extend any support you are willing to give during this tough time.

Shailah Arreola-Bittner Timeline Recent Add Friend



me for things I hadn't done, to almost forcing me to have my campaign material removed due to false copyright claims, to distributing a text message maliciously edited to mislead and manipulate my colleagues, as well as the students at large, through a smear campaign meant to ruin my reputation, Sophia Ruiz proved to me that she was more than willing to wield the dirtiest bullying tactics to win at all cost, rules be damned. However I myself believe that our student leaders should be held to a higher standard which is why I'm pushing forward with a complaint to Student Court, given that the Student Code of Conduct has rules that prohibits bullying, slander and harassment, all of which I believe she has violated. I recognize that by ensuring my voice is heard I risk retaliation in the form of my post being flagged because by reclaiming my narrative I have exposed an ugly truth that others may want to keep hidden. As I said before, my full complaint is attached below and I'd really appreciate if you'd give it a read as well as extend any support you are willing to give during this tough time.

Friends · 230



When someone attacks your character for personal gain, it can be a jarring experience. It can be equally daunting trying to explain the sequence of events that led to it because they seem to come out of nowhere. Nevertheless, I will attempt to address the ways in which Sophia Ruiz intentionally degraded my character. Put simply, Sophia engaged in the following intentional and malicious conduct, with the intent of assassinating my reputation in order to steal votes in a close election. Specifically, Sophia:

- Attempted to have my advertising material, as well as that of almost every other candidate, disqualified from the election due to false copyright claims
- Spent thirty varied threatening text messages wrongfully accusing me of engaging in unethical conduct
- Spread defamatory rumors and falsehoods about me in order to ruin my reputation
- Distributed a text message conversation in which she maliciously edited the threads to mislead and manipulate my colleagues, the students at large, and anyone who ends up reading the falsified text conversation (it was shared on the internet and it is now impossible to determine how widely disseminated it was all so that she could discredit my character and win the election.

In addition, any of these attacks might be grounds as grounds that, while endorsing the word part of public, could be excused, but taken together they demonstrate a pattern of underhanded, abusive behavior that can only be described as bullying and harassment. As a result, her conduct not only violates the M. SAC Student Code of Conduct and the Associated Students Constitution, it makes a mockery of our commitment as leaders of the Student Body to act ethically during the election process. Based on her transgressions, the only remedy that seems plausible is to disqualify Sophia Ruiz retroactively from the election, but I am open to other solutions that are equitable given the gravity of her actions.

Throughout the Associated Students election my opponent, Sophia Ruiz, displayed a pattern of abusive, manipulative behavior that she used to turn my friends and colleagues against me in order to win the election for Student Trustee. This behavior began with Sophia reaching out to me shortly after the filing for the positions had closed.

Sophia began by reaching out with a text accusing me of poor unethical conduct. In fact, she went so far as to state that she hoped I wouldn't begin. When I assured her that I would continue to not break any rules, she indicated that she meant something deeper by her



11 reactions (Like, Love, Wow) 6 Shares Write a comment... Press Enter to post.

When someone attacks your character for personal gain, it can be a jarring experience. It can be equally daunting trying to explain the sequence of events that led to it because they seem to come out of nowhere. Nevertheless, I will attempt to address the ways in which Sophia Ruiz intentionally degraded my character. Put simply, Sophia engaged in the following intentional and malicious conduct, with the intent of assassinating my reputation in order to steal votes in a close election.: Specifically, Sophia:

- Attempted to have my advertising material, as well as that of almost every other candidate, disqualified from the election due to false copyright claims
- Sent thinly veiled threatening text messages wrongfully accusing me of engaging in unethical conduct
- Spread defamatory rumors and falsehoods about me in order to ruin my reputation
- Distributed a text message conversation, in which she maliciously edited the threads to mislead and manipulate my colleagues, the students at large, and anyone who ends up reading the falsified text conversation (it was shared on the internet and it is now impossible to determine how widely disseminated it was) all so that she could discredit my character and win the election

In isolation, any of these attacks might be ignored as gamesmanship that, while evidencing the worst part of politics, could be excused, but taken together they demonstrate a pattern of underhanded, abusive behavior that can only be described as bullying and harassment. As a result, her conduct not only violates the Mt. SAC Student Code of Conduct and the Associated Students Constitution, it makes a mockery of our commitment as leaders of the Student Body to act ethically during the election process. Based on her transgressions, the only remedy that seems plausible is to disqualify Sophia Ruiz retroactively from the election, but I am open to other solutions that are equitable given the gravity of her actions.

Throughout the Associated Students election my opponent, Sophia Ruiz, displayed a pattern of abusive, manipulative behavior that she used to turn my friends and colleagues against me in order to win the election for Student Trustee. The behavior began with Sophia reaching out to me shortly after the filing for the positions had closed.

Sophia began by reaching out with a text accusing me of prior unethical conduct. In fact, she went so far as to state that she hoped I wouldn't again. When I assured her that I would continue not to break any rules, she indicated that she meant something deeper by her comments and again implied that I was engaging in unethical behavior regarding the campaign. (Exhibit A)

At the time, I did not reply to these comments because they left me confused as to her meaning. It was not until later that I realized she was laying the seeds so that she could tell others that I was unethical. In fact, given her later conduct, this may have been her first attempt to obtain texts from me for later "editing", but at the time I gave her the benefit of the doubt.

Following this initial conversation, Sophia's abusive behavior escalated beyond the point where anyone could mistake it for anything other than a blatant attempt to win at all costs. She began using artwork from other candidates with the clear intent of making the reader believe that these candidates were supporting her campaign. Not only were these candidates supporting me instead of her, but she also used the pictures without obtaining the candidates' or the artist's consent.

When the artist discovered the misuse of her work, she messaged Sophia asking her to take these graphics down due to her using artwork that wasn't her own. Sophia responded by sending a message to our advisor Giovanni Rodriguez, which resulted in every candidate, other than Sophia and Maricela, almost losing their ballot pictures and statements, if not days of campaigning due to election violations. But what cannot be ignored is that, if not for our ability to obtain a letter of consent to immediately counter her allegations, this would have been the result. (Exhibit B) (Exhibit C)

This underhanded tactic to disqualify the campaigns of those who did not support her was the second example of Sophia's pervasively abusive behavior and I directly addressed the situation with her. I angrily explained that it was not my fault that she did not have the support of others running, and that it was not right that she tried to disqualify candidates simply because she was not allowed to pretend as though they supported her when they did not. To this she apologized, but given her behavior after this point, I now realize this is where the smear campaign against myself and the candidates who supported me began (Exhibit D).

From the point where she was finally able to obtain the types of messages she could "work with" she started "editing" my comments to eliminate the context and remove those parts that described why I was upset, or that placed her in a bad light, all in order to intentionally discredit me to my colleagues. To them, she spun the situation and only included the newly doctored comments where it seemed as though I was attacking her by reaching out to her out of sheer spite to tell her that nobody supported her, despite the fact I clearly indicated that I was simply talking about the candidates for other offices in the full text message thread. In other words, with manipulative intent, she took my statements out of context and turned them into an attack on her. But the best part of her scheme was the timing, because it was all geared to affect the election before I could defend myself.

Our conversation occurred on the Friday preceding Election Week, and I moved forward with the campaign giving all of these grievances little thought. It was not until almost a week later on Thursday, the last day of voting, that I found out from a third party that Sophia had been secretly sending around edited versions of our conversation all week. In her attempt to cast doubt on my character and turn all of our colleagues against me, she had inadvertently approached someone who informed me of what was going on. This bears repeating, she did not approach me or confront me with accusations of wrongdoing, as someone who felt genuinely aggrieved, instead I had to find out by having the edited text messages sent to me by a mutual friend, who wanted to know the context of the comments I had made.

Needless to say, but still not clear on the extent of her deception, I apologized for my comments, giving her the benefit of the doubt, yet again, and wanting to bury the hatchet with someone I considered a colleague. It was at this point that she really put her plan into full throttle. She refused to put things behind us and began to openly twist the situation into one where she was the victim who was bullied despite all of her manipulative behavior to discredit me (Exhibit E).

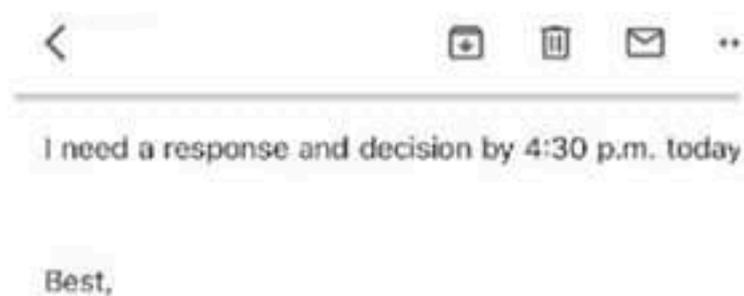
I later saw in one of our group chats that Sophia had been attacking myself and Hugo, calling us hypocrites and insinuating that we lacked moral character. This harassment in our chat, along with the texts she was sending around to our colleagues and the public posting of these edited texts on her Facebook, constitute an attempt to bully and assassinate my character in a way I have never experienced. Below I have included both the original text and the edited text she posted on her Facebook with the clear intent of garnering sympathy through her false narrative (Exhibit F).

The amount of effort she put into systematically dispensing this false narrative in order to stop people from voting for me made me feel isolated and unwelcome in Associated Students. I received further confirmation after the election that she had reached out to other colleagues during the election with the same false narrative, in order to make me out to be a bad person. She clearly did this with the intent of swinging the election, waiting almost a full week before coming after me publically with her lies so that there could be no repercussions for her actions, given voting at that point was all but done. These actions clearly violate the Student Code of Conduct, the Associated Students Constitution, and most likely the elections rules as well.

Unless we are all willing to allow Sophia Ruiz to profit from her disgraceful conduct, I believe the only recourse at this point is to disqualify her from the election in order to maintain the integrity of our process and institution. I am open to other equitable solutions, however I see no other repercussions that can achieve an open and fair election, given the voting has already taken place and her statements have already permeated amongst my colleagues and the voters. Allowing her to serve after bullying and lying her way into the position sets a dangerous precedent that would tell future campaigns that slandering someone, falsely copyright striking them, and bullying are effective ways of becoming Associated Students leadership. If there is any doubt in your mind that what she did cannot be tolerated, ask yourself this: What is the difference between what she did and any other false allegation that uses doctored conversations to lie to voters? There has to be a line and she has crossed it.

Exhibit A





**Giovanni D. Rodriguez, M.S. Ed**

Coordinator, Student Activities | Advisor, AS

Student Life Office | Student Services

✉ [grodriguez193@mtsac.edu](mailto:grodriguez193@mtsac.edu)

📞 (909) 274-5954

📠 (909) 274-2077

📍 Building: 9C, Room: 20A

📅 M-F

🕒 9:00 a.m. - 6:00 p.m.

**Mt. San Antonio College**

[1100 N. Grand Ave.](#)

8:14

Memo Inbox

Angeline Ang Apr 3

to gdriguez193, cdarcy, echavez98,...



Hello Gio,

This is my graphic design work email.

I read your email regarding the memo. Please see attached memo.

I am fully aware this is regarding Sophia Ruiz's Instagram post. Please note, however, that she edited and used my own art without my consent. My issue was her grabbing a screenshot of my work, and editing it on her own poster, which is why I took action. I spoke to her about taking it down, but she disregarded my message and did not reply until only after Instagram made their decision. All the other candidates do not manipulate my work and have my full consent on using them.

Best,  
Angeline

\*\*\*

Memo\_GiovanniR  
odriguez.pdf



PDF

8:14



X Memo\_GiovanniRodrigue...



**Angeline Nicole A. Capido**  
Phone: (626) 898-2359  
Email: [angelineang.g@gmail.com](mailto:angelineang.g@gmail.com)

SENT VIA EMAIL

**Giovanni Rodriguez**  
Student Activities Coordinator  
Mt. San Antonio College  
1100 N. Grand Avenue,  
Walnut, CA 91789

Dear Mr. Giovanni Rodriguez,

This is to notify you that I am serving as the freelance graphic designer of the following: Shailah Arneola-Bittner, Courtney Darcy, Hugo Fulcheri, and Erick Chavez.

I therefore authorize the publication of my work on any social media platform of their choosing by the names mentioned above, as well as republication of Mt. San Antonio College and Mt. SAC Associated Students.

However, any manipulated (edited) use of my intellectual property without my consent will be dealt with accordingly based on the social media platform's copyright rules.

If you have any further questions, please feel free to reach me at (626) 898-2359 or [angelineang.g@gmail.com](mailto:angelineang.g@gmail.com).

Sincerely,

Angeline Ang Capido

## Exhibit D



&lt; 16

Sophia 🗣️ 😊 &gt;

and childish, and you tried to essentially get all of us kicked out because you were angry that you weren't allowed to make it seem like you had candidates endorsing you when in reality you have no support.

And lastly for someone who talks such a big game about running a clean campaign, you have proven that you will be the first to pull all this unnecessary bullshit. So let me give a little advice so you don't continue embarrassing yourself in the future, next time you want to strike out against people you feel like have wronged you, try thinking long and hard about that because if you do, you'll likely find that you have no one to blame but yourself.

My intent was to understand. I was asking what I was doing wrong. And Gio helped me understand that. Under no way was I trying to hurt anyone. I truly thought I was just helping others. I didn't know your headshots were designed by someone else and I did not anticipate what happened next.

I apologize.

## Exhibit E



Exhibit F

< 15 Sophia 🗨️ 🤔 >

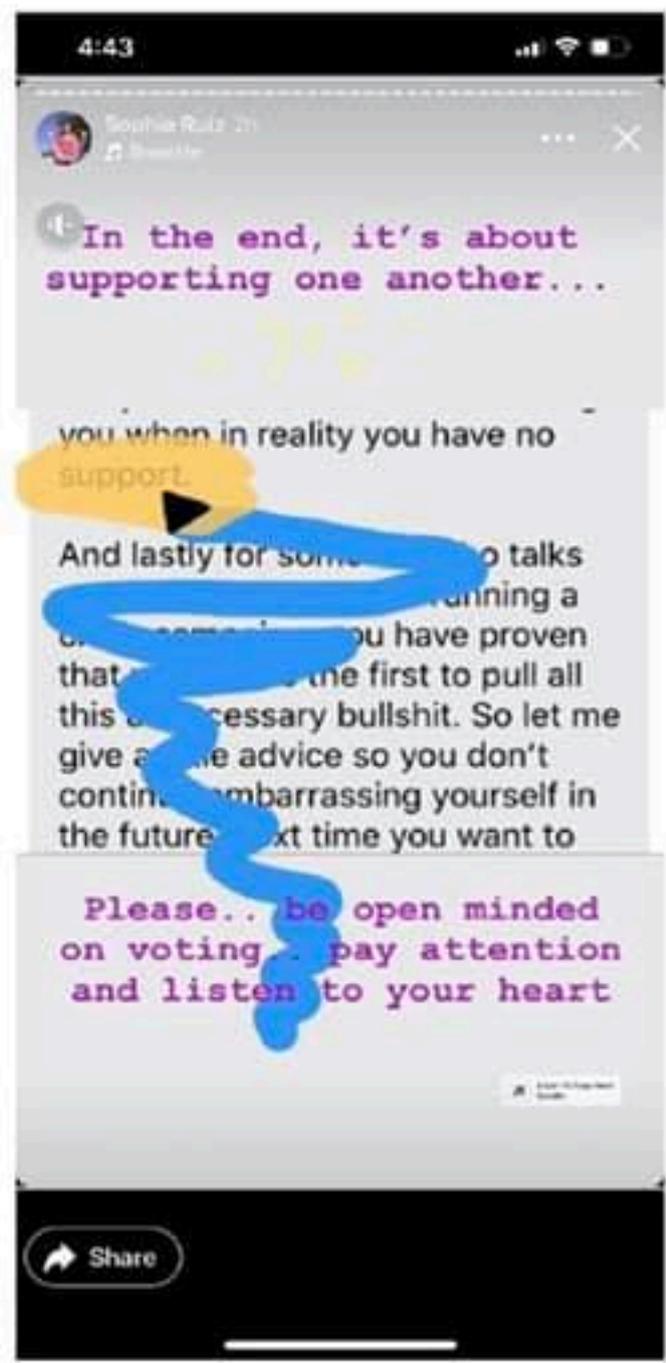
Fri, Apr 3, 3:35 PM

Okay, let me make something very clear to you. You were struck with copy right infringement on IG because Angeline was angry at you because you decided to make a post that made it seem like you were running in conjunction with people who have endorsed me, not you. Which was already a little low to begin with because I am the person who made sure all of them ended up running not you, so you have no right to make it seem like you are all on the same team.

Then, instead of handling it maturely you decided to be petty and childish, and you tried to essentially get all of us kicked out because you were angry that you weren't allowed to make it seem like you had candidates endorsing you when in reality you have no support.

< 16 Sophia 🗨️ 🤔 >

And lastly for someone who talks such a big game about running a clean campaign, you have proven that you will be the first to pull all this unnecessary bullshit. So let me give a little advice so you don't continue embarrassing yourself in the future, next time you want to strike out against people you feel like have wronged you, try thinking long and hard about that because if you do, you'll likely find that you have no one to blame but yourself.



# EXHIBIT 7



Building 9C  
Administration | Center  
(909) 274-4525 | (909) 274-5959  
[www.mtsac.edu/studentlife](http://www.mtsac.edu/studentlife)



**Associated Students Officer  
Public Servant Agreement**

I, Kian Bidari, accept the duties and responsibilities of the ICC-co-chair  
(name) (position)

for Mt. San Antonio College Associated Students (A.S.) for the term of 2019-2020. During my  
(academic year)

tenure of this A.S. Officer position, I agree to adhere to the following conditions for my Public Servant Leader Role:

1. Perform the duties outlined in the Associated Students Constitution and Directives,
2. Adhere to and uphold the Mt. San Antonio College Standards of Conduct, Board Policies, and Procedures,
3. Shall sit and be a representative on at least two Associated Students committees (*excludes Student Court*),
4. Shall sit and be a representative on at least one campus wide committee (*excludes Student Court*),
5. Disclose all conflict(s) of interest circumstances that pertain to this position,
6. Attend all trainings designated and scheduled for my position,
7. Actively and positively promote the mission of Mt. San Antonio College and Associated Students
8. Assume all responsibility in having complete authority for my actions and behaviors in the execution of my public servant role,
9. Utilize the A.S. leader office for official A.S. business and uphold the established Student Life Center Office Culture Norms (*reverse side*),
10. Other appropriate duties as necessary to perform the role and function of my position.

**Mt. SAC A.S. Materials/Gear:** I acknowledge receipt of a polo, nametag and other Mt. SAC A.S. related materials/swag. I also agree not to loan, transfer, give possession for misuse, modify or alter the materials/swag items. I further agree not to cause, allow or contribute to the making of any unauthorized copies of my personalized materials/swag. These items issued is responsibility of student officer and not subject for loan to a third party or duplication. Name Tags, Polo, or other A.S. event t-shirt must be worn in the A.S. office at all times and at any events that are sponsored by A.S. or official College events in which A.S. has a committed hosted or sponsored presence. The Nametag, Polo, or other A.S. event related clothing are the property of Mt. SAC A.S. until the end of the officers' appointment, which then the officer may keep it as a personal souvenir. I understand and agree that violation of this agreement or loss of the materials/swag items due to my negligence may result in progressive advisement from my A.S. Advisor.

**Compensation:** Due to the nature of this position, this position represents the voices of its constituents and the Mt.SAC Community; thus my services are voluntary unless otherwise outlined and approved by the College. This position is considered under the status of a Mt. SAC student volunteer.

**Terms:** If I do not adhere to the items outlined above in this agreement or what is stated in Mt. SAC policies, I may be subject to disciplinary actions by A.S. and/or Mt. SAC, and if the conduct or performance is egregious, I may be referred to the Student Life Office for disciplinary action/removal of office.

Kian Bidari  
Officer Name

[Signature]  
Signature

8-19-19  
Date

**Dr. Andi Fejeran Sims**  
Mt.SAC A.S. Advisor Name

[Signature]  
Mt.SAC A.S. Advisor Signature

8/19/19  
Date



Building 9C  
Administration | Center  
(909) 274-4525 | (909) 274-5959  
[www.mtsac.edu/studentlife](http://www.mtsac.edu/studentlife)



### Student Life Center Office Culture Norms

1. Keep office clean at all times.
  - a. Do not leave food.
  - b. Throw away food in outside trash cans.
  - c. Clean up work stations after use.
2. Be courteous with meetings.
  - a. Schedule meetings by appointment only.
  - b. Input meetings via A.S. shared google calendar 3 business days prior to the meeting date.
    - i. Only 2 meetings at one time may take place in the office.
  - c. Meetings in office are to be with one person, any meeting requiring 2 or more persons shall be met outside the office.
    - i. A.S. officers reserve the right to meet in the partitioned space for meetings if it does not conflict with student rep business.
  - d. No meetings during A.S. hosted events.
3. Office use.
  - a. Office workspace is for A.S. business only as per constitution (art 3, sec 3), organizational directive ( II, C), and oath into office.
  - b. Office will be closed during A.S. hosted events and will instead be used for storage.
    - i. Printing will be allowed for event related paperwork only.
  - c. Only A.S. officers will be allowed to use the A.S. office workspace and supplies (computers, netbooks, etc).
    - i. Student reps may use the netbooks to print on A.S. printers and reserve the right to use space in partitioned area.
  - d. No fraternizing within the workspace.
4. Office attitude.
  - a. Respect colleagues.
  - b. Be accountable.
  - c. Be professional.

# SIGNATURE PAGE

Signature:   
Amy Truong (Apr 30, 2020)

Email: atruong37@student.mtsac.edu

Signature:   
Claudia Fierros (Apr 30, 2020)

Email: cfierros3@student.mtsac.edu

Signature:   
Aya Garawi (Apr 30, 2020)

Email: agarawi@student.mtsac.edu

# Complaint; Motion to Impeach

Final Audit Report

2020-05-01

Created:	2020-05-01
By:	Kian Bidari (kbidari@student.mtsac.edu)
Status:	Signed
Transaction ID:	CBJCHBCAABAAgk9fS04W79A-VSF-gTCp3bIX2HAu2vsu

## "Complaint; Motion to Impeach" History

-  Document created by Kian Bidari (kbidari@student.mtsac.edu)  
2020-05-01 - 5:31:33 AM GMT- IP address: 47.145.223.104
-  Document emailed to Amy Truong (atruong37@student.mtsac.edu) for signature  
2020-05-01 - 5:32:33 AM GMT
-  Document emailed to Claudia Fierros (cfierros3@student.mtsac.edu) for signature  
2020-05-01 - 5:32:33 AM GMT
-  Document emailed to Aya Garawi (agarawi@student.mtsac.edu) for signature  
2020-05-01 - 5:32:33 AM GMT
-  Email viewed by Amy Truong (atruong37@student.mtsac.edu)  
2020-05-01 - 5:33:53 AM GMT- IP address: 66.249.84.175
-  Document e-signed by Amy Truong (atruong37@student.mtsac.edu)  
Signature Date: 2020-05-01 - 5:34:31 AM GMT - Time Source: server- IP address: 172.116.90.104
-  Email viewed by Claudia Fierros (cfierros3@student.mtsac.edu)  
2020-05-01 - 5:35:15 AM GMT- IP address: 47.138.97.207
-  Email viewed by Aya Garawi (agarawi@student.mtsac.edu)  
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Signature Date: 2020-05-01 - 5:40:56 AM GMT - Time Source: server- IP address: 47.138.97.207
-  Document e-signed by Aya Garawi (agarawi@student.mtsac.edu)  
Signature Date: 2020-05-01 - 5:48:13 AM GMT - Time Source: server- IP address: 172.58.19.247
-  Signed document emailed to Claudia Fierros (cfierros3@student.mtsac.edu), Amy Truong (atruong37@student.mtsac.edu), Aya Garawi (agarawi@student.mtsac.edu), and Kian Bidari (kbidari@student.mtsac.edu)  
2020-05-01 - 5:48:13 AM GMT