

# WORKPLACE VIOLENCE PREVENTION PLAN

(EFFECTIVE JULY 1, 2024)

## I. Purpose

- A. Vital to achieving the mission and goals of California State University, Fullerton (University or CSUF) is an unwavering commitment to providing its faculty, staff, students and volunteers a safe, respectful and inclusive environment in which to learn, study, and work. Management working with faculty, staff and other employers will help prevent workplace violence and promote the well-being of all members of the University community as well as University guests, visitors, contractors and vendors.
- B. Workplace violence incidents severely impact not only the safety of campus community members, but also the open dialogue and free exchange of ideas intrinsic to higher education. Therefore, the University has established a Workplace Violence Prevention Plan (WVPP) to address and provide corrective measures associated with the workplace violence hazards unique to the work areas and operations of the University. Members of the University community are encouraged to immediately report workplace violence incidents, each of which will be taken seriously and investigated.

## II. Authority

California Labor Code Sections 6401.7 and 6401.9.

## III. Scope

The WVPP applies to all members of the University community when engaged in University academic, business or co-curricular programs and activities, whether on or off-campus. The WVPP does not apply to University employees when telecommuting from a location of the employee's choice, not under the control of the University. University auxiliary organizations are responsible for applying similar practices to their respective employees, programs and activities.

## IV. Definitions

- A. **Emergency.** Unanticipated circumstances that can be life threatening or pose a risk of significant injuries/harm to an individual.
- B. **Engineering controls.** An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between an individual and the hazard.
- C. **Log.** The violent incident log required by Labor Code Section 6401.9.
- D. **Members of the University community.** University faculty, staff, students and volunteers.
- E. **Threat of violence.** Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

- F. **Workplace violence.** Any act of violence or threat of violence that occurs in a place of employment. This term includes but is not limited to the following:
1. The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
  2. An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
  3. The following four workplace violence types:
    - a) **Type 1 violence** - Workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.
    - b) **Type 2 violence** - Workplace violence directed at employees by customers, clients, patients, students or visitors.
    - c) **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.
    - d) **Type 4 violence** - Workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.
  4. **Workplace violence** does not include lawful acts of self-defense or defense of others.
- G. **Work practice controls.** Procedures and rules which are used to effectively reduce workplace violence hazards.
- V. **Workplace Violence Incidents**
- A. Reporting Workplace Violence
1. Members of the University community who witness or perceive workplace violence may report that incident of workplace violence or other workplace violence concern using one or more of the following means.
    - a) 9-1-1 (when safe to do so)
    - b) Emergency Blue Phones: Exhibit A contains a copy of the locations of Blue Phones on campus.
    - c) To their MPP supervisor, lead, appropriate administrator or faculty instructor.

- d) Using the University's Workplace Violence Incident Reporting Form (which includes an anonymous option).
  - e) Contacting the University's Workplace Violence Hotline.
  - f) Contacting the local Cal/OSHA enforcement district office at 714-558-4411 or [DOSHEnforcement@dir.ca.gov](mailto:DOSHEnforcement@dir.ca.gov).
2. The University strictly prohibits any retaliation for reporting an instance of workplace violence. Any member of the University community who retaliates against someone for reporting an incident is subject to discipline, including and up to dismissal or expulsion.
3. To prepare for a workplace violence emergency and enhance the likelihood that a member of the University community will report an incident, the University will take the following actions:
- a) Ensure that the WVPP is discussed during new employee and volunteer orientations and with students.
  - b) Require University employees to complete workplace violence prevention training. Encourage all other members of the University community to complete this training.
  - c) Require all departments and administrative units to at least annually discuss, review and communicate to their employees the security protocols and workplace violence hazards and mitigation measures in their work areas.
  - d) Post and distribute workplace violence prevention information on employee and student portals.
  - e) Communicate in writing at the beginning of the semester to all members of the University community how individuals can report a violent incident, threat, or other workplace violence concern without fear of reprisal or adverse action.

B. Emergency Communication

1. In the event of a workplace violence emergency, the University will communicate through the following means in a manner readily understandable by all members of the University community.
- a) Send alerts to members of the University community through the Timely Warning, Emergency Notification and/or Safety Bulletin process.
  - b) Broadcast alerts through the emergency indoor/outdoor broadcast systems.

2. When information is available and appropriate, these alerts will:
  - a) Provide the presence, location and nature of the workplace violence emergency.
  - b) Note evacuation or sheltering plans appropriate and feasible for the situation.
  - c) Inform recipients how to obtain assistance from the University Police Department (CSUF PD) or other law enforcement agencies.

C. Violent Incident Log

1. The CSUF PD is primarily responsible for maintaining the Log, which will be used to record every workplace violence incident. The Log will include the following information:
  - a) The date, time, and location of the incident.
  - b) The workplace violence type or types involved in the incident (Type 1, 2, 3 and/or 4 as defined in Section IV. F. 3 above.)
  - c) A detailed description of the incident.
  - d) A classification of who committed the violence, including whether the perpetrator was a student, volunteer, visitor, client or customer; family or friend of an employee, student, volunteer, visitor, client or customer; stranger with criminal intent; employee, supervisor or manager; partner or spouse; parent or relative; or other perpetrator.
  - e) A classification of circumstances at the time of the incident, including, but not limited to, whether the University faculty member, staff member or volunteer was completing usual job duties, working in a poorly lit area, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
  - f) A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
  - g) The type of incident, including, but not limited to, whether it involved any of the elements listed below. For this part of the Log, "Type of Incident" specifically refers to the nature or characteristics of the incident being logged. It does not refer to the type of workplace violence as defined in Section IV. F. 3 above.
    - (1) Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
    - (2) Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.

- (3) Threat of physical force or threat of the use of a weapon or other object.
  - (4) Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
  - (5) Animal attack.
  - (6) Other.
- h) Consequences of the incident, including, but not limited to:
- (1) Whether security or law enforcement was contacted and their response.
  - (2) Actions taken to protect employees or other members of the University community from a continuing threat or from any other hazards identified as a result of the incident.
  - (3) Whether there were any injuries as a result of the incident, and if so, a description of the injuries.
  - (4) Whether emergency medical responders other than law enforcement were contacted, and if so, identification of the other responding agencies or companies that were contacted.
  - (5) Whether the severity of injuries required reporting to Cal/OSHA, and if so, the date, time and to whom the report was made.
- i) If the workplace violence incident occurred at a worksite not under the University's control (excluding work areas under the control of a University auxiliary), a copy of that violent incident log must be provided to the University. The University official who receives that log should note that they received it and when.
- j) Information about the person completing the Log, including their name, job title, and the date completed.

#### D. Post-Incident Response and Investigation

After a workplace violence incident, the Chief of CSUF Police Department, in conjunction with the Executive Director, Risk Management and Compliance, will implement the following post-incident procedures:

1. Visit the scene of an incident as soon as safe and practicable.
2. Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.

3. Review security footage of existing security cameras if applicable.
4. Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
5. Determine the cause of the incident.
6. Take corrective action to prevent similar incidents from occurring.
7. Record the details of the workplace violence incident and findings and ensure corrective actions are taken.
8. Obtain any reports completed by law enforcement.
9. Review all previous incidents.
10. Ensure that prior to disclosure, personal identifying information is redacted from any written post-incident investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

## **VI. Workplace Violence Prevention and Mitigation**

### **A. Threat Consultation Team**

1. The Threat Consultation Team (TCT) provides collaborative oversight and support to the University in the identification, assessment and management of threats and/or threatening behavior that may lead to workplace violence.
2. The TCT's core members include representatives from the Office of Labor and Employee Relations (LER), Risk Management, CSUF Police Department, Dean of Students, Care Services and Counseling and Psychological Services (CAPS) as well as the University Counsel.
3. The CSUF Police Department will receive and address or mitigate threats identified by the TCT. CSUF Police Department may refer matters to administrative positions or offices such as Title IX and Gender Equity; Discrimination, Harassment and Retaliation Officer; and the Office of the Dean of Students for further review.

### **B. Training**

1. The University will provide training to members of the University community:
  - a) When the WVPP is first established.
  - b) Annually.

- c) Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the WVPP. The additional training may be limited to addressing the new workplace violence hazard or changes to the WVPP.
- 2. The training, which is required of employees and volunteers and is voluntary for students, will review and explain the definitions set forth in Section IV above and the requirements listed below:
  - a) The WVPP, how to obtain a copy of the WVPP at no cost, and how to participate in development and implementation of the WVPP.
  - b) How to report workplace violence incidents or concerns to the University or law enforcement without fear of reprisal.
  - c) The warning signs of potential workplace violence.
  - d) Workplace violence hazards specific to work areas at the University, any engineering or work practice controls the University has implemented, how to seek assistance to prevent or respond to workplace violence, and strategies to avoid physical harm.
  - e) The Log and how to obtain copies of records pertaining to (1) WVPP hazard identification, evaluation and correction and (2) WVPP training records.
  - f) Strategies to avoid/prevent workplace violence and physical harm, such as:
    - (1) How to recognize workplace violence hazards, including the risk factors associated with the four types of workplace violence.
    - (2) Ways to defuse hostile or threatening situations.
  - g) How to recognize alerts, alarms, or other warnings about emergency conditions and how to use identified escape routes or locations for sheltering.
  - h) Post-event trauma counseling for employees desiring such assistance.
  - i) Corrective measures implemented.
  - j) Contact information for persons knowledgeable about the WVPP and the opportunity for interactive questions and answers with such persons.
- C. Workplace Violence Physical Hazard Identification and Evaluation
  - 1. The Office of Environmental Health & Safety (EHS), in coordination with CSUF Police Department, will oversee the identification of workplace violence physical hazards.
  - 2. Members of the University community may report workplace violence physical hazards or concerns using the following means:
    - a) Environmental Health and Safety's Campus Safety Report Form.

- b) To the CSUF PD.
- c) Anonymously on the University's Workplace Violence Hotline.

EHS administrators and staff will review and document outcomes of all such reports.

3. EHS will coordinate and conduct annual campus inspections with the purpose of identifying and documenting unsafe physical conditions, including those that may make a crime more likely to occur. As part of the inspection, areas reviewed and administrators and staff who conducted the review will be documented. EHS will also conduct an inspection when the WVPP is first established and after any workplace violence incident. EHS administrators and staff will also review and assess new or previously unrecognized hazards.
4. CSUF Police Department is responsible for annually evaluating factors specific to University work areas that may result in risk of workplace violence, such as:
  - a) The need for violence surveillance measures, such as mirrors and cameras. Procedures outlining how an employee should respond during a robbery or other criminal act.
  - b) Procedures for reporting suspicious persons or activities.
  - c) Effective location and functioning of emergency buttons and alarms.
  - d) Posting of emergency telephone numbers for law enforcement, fire, and medical services.
  - e) Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security windows, physical barriers, and restraint systems.
  - f) Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms or panic buttons.
  - g) Availability of employee escape routes.
  - i) Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom an employee may be having a dispute.
  - j) Frequency and severity of related employee reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
  - k) Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the specific workplace.

D. Workplace Violence Physical Hazard Correction

1. EHS, in coordination with the Offices of Risk Management and Compliance, CSUF Police Department and Capital Programs and Facilities Management, will direct the evaluation and timely correction of identified workplace violence physical hazards.
2. All corrective actions taken/engineering controls adopted will be documented, dated and recorded.
3. Corrective measures and/or engineering controls for workplace violence physical hazards will be specific to a given work area, for example:
  - a) Improve lighting around and at the workplace.
  - b) Install and utilize surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
  - c) Provide workplace security systems, such as door locks, security windows, physical barriers, emergency alarms and restraint systems.
  - d) Post emergency telephone numbers for law enforcement, fire, and medical services.
  - e) Install effective systems to warn others of a violence danger or to summon assistance, e.g., alarms or panic buttons.
4. The University will undertake corrective measures and/or engineering controls to correct physical hazards in a timely manner based on the severity of the hazard.

E. Workplace Violence Unsafe Work Practice Hazard Identification, Evaluation and Correction

1. LER will coordinate and conduct annual reviews of employment practices to mitigate and reduce the likelihood that such practices could underlie a threat or act of violence.
2. Members of the University community may report unsafe work practices or other workplace violence concerns using the following means:
  - a) Environmental Health and Safety's Campus Safety Report Form.
  - b) To the CSUF Police Department.
  - c) Anonymously on the University's Workplace Violence Hotline.
3. LER Administrators and staff will review and document the outcomes of all such reports.
4. LER administrators and staff will also annually review and assess new or previously unrecognized work practice hazards.

5. The University will mitigate and/or reduce such practices in a timely manner based on the severity of the hazard.

## **VII. Responsibilities**

The following administrative positions have the authority and responsibility for implementing all or specific portions of the WVPP.

- A. The Vice President for Administration and Finance and Chief Financial Officer is responsible for the implementation and overall coordination of the University's WVPP, which includes assessing the effectiveness of the WVPP as well as its compliance with applicable federal and state laws and regulations as well as California State University (CSU) and University policies.
- B. The primary responsibility of the Chief of the CSUF Police Department is to implement measures to ensure the University is prepared to respond to, investigate and potentially mitigate workplace violence incidents. Other responsibilities include:
  1. Primary responsibility for coordinating the issuance of Emergency Notifications and/or Safety Bulletins related to workplace violence incidents, which will include evacuation and/or sheltering in place instructions when applicable.
  2. Record workplace violence incidents in the Log and maintain the Log.
  3. Receive and investigate all reports of workplace violence.
  4. Chair the Threat Consultation Team.
  5. Coordinate all required Log reviews, which include:
    - a) Annually.
    - b) After a workplace violence incident.
    - c) When a new hazard becomes known.
- C. The Executive Director, Risk Management and Compliance, has primary responsibility for ensuring that all training associated with the WVPP meets applicable federal and state laws and regulations as well as CSU and University policies and maintaining records of completion of such training. Other responsibilities include:
  1. Ensure opportunities exist for the active engagement of members of the University community and authorized employee representatives in:
    - a) The development, implementation and ongoing review of the WVPP.
    - b) The development and functionality of reporting mechanisms.

- c) Review of post-incident investigations of workplace violence incidents.
    - d) The design and review of campus-specific training.
  - 2. Support University efforts regarding post-incident response and review.
  - 3. Chair the WVPP Working Group.
  - 4. Coordinate all required Plan reviews, which include:
    - a) Annually.
    - b) After a workplace violence incident.
    - c) When a new hazard becomes known.
- D. The Director of Environmental Health and Safety has primary responsibility for ensuring the functionality of procedures established to identify and receive reports related to physical workplace violence hazards and the engagement of members of the University community in identifying, evaluating and correcting physical workplace violence hazards. Other duties include:
  - 1. Maintain records of physical hazard inspections outlined in Section VI.C.3.
  - 2. Ensure the implementation of corrective actions/engineering controls to confirm workplace violence and physical hazards.
  - 3. Communicate to members of the University community regarding any corrective measures taken regarding workplace violence and physical hazards.
  - 4. Conduct all required assessments, which include:
    - a) When the WVPP is initially implemented.
    - b) Annually.
    - c) After an act of workplace violence.
    - d) When a new hazard becomes known.
  - 5. Ensure the University's Injury and Illness Prevention Plan (IIPP), including the WVPP, meet the requirements set forth in Labor Code Section 6401.7.
  - 6. Ensure that the WVPP is available and easily accessible at all times, meets the requirements of Labor Code 6401.9, and is incorporated into the University's IIPP.

- E. The Assistant Vice President, Labor and Employee Relations, has primary responsibility for ensuring the functionality of procedures established to identify and receive reports related to Work practice workplace violence hazards and the engagement of employees in identifying, evaluating and correcting Work practice workplace violence hazards. Other duties include:
  - 1. Maintain records of Work practice workplace violence hazards assessment, review and correction.
  - 2. Communicate to employees regarding any corrective measures taken regarding Work practice workplace violence hazards.
  - 3. Investigate reported acts or threats of violence forwarded from the from CSUF Police Department.
  - 4. Develop procedures to address swiftly any retaliation of employees who submitted reports.
  
- F. The Director of Emergency Management has primary responsibility for developing and implementing procedures on how to respond to violent emergencies, including evacuation and/or sheltering-in-place plans. Other duties include:
  - 1. Assisting the Clery Director in issuing timely notices, emergency warnings and/or safety bulletins related to workplace violence incidents.
  - 2. Developing and implementing procedures to communicate with members of the University community concerning how to report a workplace violence incident or other concern.
  
- G. The Director, Contracts and Procurement, has primary responsibility for coordinating the implementation of the WVPP with other employers who have employees at the University to ensure that those employers and employees understand their roles and receive training.
  
- H. The Clery Director has primary responsibility for coordinating the issuance of Timely Warnings to alert members of the University community of a workplace violence incident. Other duties include responding to requests for associated workplace violence records as outlined in Section VIII.C.2, except for incident investigations, within required time frames.
  
- I. The Director of Total Wellness has primary responsibility for the University's OSHA 300 log. Other duties include:
  - 1. Ensure reporting of serious injury or fatality per Title 8 CCR Sections 330(a) and 342 as well as including such information on the Log.
  - 2. Assess after a workplace violence incident whether providing support and resources, such as counseling services, would benefit employees.
  - 3. Contact CAPS after a workplace violence incident and request that it assess whether providing support and resources, such as counseling services, would benefit students.

- J. The primary responsibility of the WVPP Working Group, once the WVPP has been developed and implemented, is to participate in the annual and other reviews/audits of the following:
  - 1. The WVPP.
  - 2. Post-incident inspections of workplace violence incidents outlined in Section V. D.
  - 3. Hazard detection and notification procedures, as well as corrective measures outlined in Section VI. C, D and E.
  - 4. Communication related to workplace violence emergencies outlined in Section V. B.
  
- K. All Management Plan Personnel and appropriate administrators have primary responsibility for implementing and maintaining the WVPP in their administrative areas, ensuring that faculty and staff have access to the WVPP and complete related training. Additional responsibilities include:
  - 1. Forwarding to CSUF Police Department any reports of workplace violence incidents received from a member of the University community, even if the situation has been resolved.
  - 2. Discussing regularly with all personnel issues related to workplace security.
  - 3. Training and/or counseling faculty and staff whose conduct is deficient in complying with work practices designed to increase workplace security.

### **VIII. General Provisions**

- A. The University will take the following measures to obtain the active involvement of members of the University community and authorized employee representatives in developing and implementing the WVPP.
  - 1. Ensure members of the University community and authorized employee representatives have opportunities to participate in and communicate with those responsible for the WVPP regarding the following:
    - a) Identifying, evaluating, and determining corrective measures (engineering or work practice controls) to prevent workplace violence.
    - b) Designing and implementing any campus-specific training.
    - c) Reporting workplace violence incidents.
    - d) Reviewing post-incident investigations.

2. Communicate all policies and procedures within the WVPP to members of the University community and authorized employee representatives using a variety of approaches, including in writing and verbally, in a form that is readily understandable.
3. Require all members of the University community to follow the WVPP and assist in maintaining a safe work and learning environment.
4. Ensure the WVPP addresses the hazards and corrective measures for all work areas/operations and learning environments.

B. Access to the Written WVPP and Requested Records

1. The WVPP will be in writing and available and easily accessible to members of the University community, authorized employee representatives, and representatives of Cal/OSHA at all times on the University's website. Printed copies will be available at the HRDI front desk, which is on the 7th floor in the College Park building, and at the EHS Office, which is located in T-1475.
2. The University will make the following records available upon request and without cost, for examination and copying within 15 calendar days of a request:

C. To promote work practices designed to make the workplace more secure, the University will:

1. Provide training to the members of the University community regarding the elements of the WVPP.
2. Develop and implement measures to promote compliance with the WVPP.
3. Retrain and counsel those who do not follow the WVPP.
4. Recognize those who demonstrate safe work practices that promote the WVPP in the workplace.
5. Counsel and/or discipline, as permitted by applicable laws, rules, regulations and collective bargaining agreements, those who fail to comply with the WVPP.
  - a) Records of workplace violence hazard identification, evaluation, and correction.
  - b) Training records.
  - c) Violent incident logs.
6. Requests should be made to Risk Management and Compliance.

D. Recordkeeping

1. EHS (physical) and LER (Work practice) will create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years. Risk Management will create and maintain training records for a minimum of one (1) year and include the following:
  - a) Training dates.
  - b) Contents or a summary of the training sessions.
  - c) Names and qualifications of persons conducting the training.
  - d) Names and job titles of all persons completing training.
2. CSUF Police Department will maintain the Log for a minimum of five (5) years. Risk Management and Compliance will do the same for records related to post-incident reviews of workplace violence incidents. These records will not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
3. The University will make all records of workplace violence hazard identification, evaluation, and correction; training, incident logs and post-incident workplace violence incident investigations required by LC section 6401.9(f), to Cal/OSHA upon request for examination and copying.

E. WVPP Review

1. The Risk Management and Compliance will ensure that the WVPP will be reviewed for effectiveness:
  - a) At least annually in April.
  - b) When a deficiency is observed or becomes apparent.
  - c) After a workplace violence incident.
2. Any review will include the WVPP Working Group, which includes members of the University community and authorized employee representatives.
3. Coordination with other Employers (other than a University auxiliary): The University through its Office of Contracts & Procurement, will communicate the WVPP to other employers on campus to ensure that those employers and their employees understand their respective roles as provided in the WVPP:
  - a) All employees are trained on workplace violence prevention.

6/17/2024

- b) Any workplace violence incidents involving any employee are reported, investigated and recorded.
- c) Employers whose employees experience a workplace violence incident will record that information in a violent incident log and provide a copy of that log to the University by contacting Risk Management.

**IX. Accountability**

Any member of the University community who engages in workplace violence or who retaliates against another member of the University community for reporting a workplace violence incident or concern is subject to disciplinary action under University policies and/or applicable collective bargaining agreements up to dismissal or expulsion. If a contractor, vendor or visitor engages in an act or threat of violence or who retaliates against another member of the University community for reporting a workplace violence incident or concern, they may be barred from University-owned or leased property and have their business relationship with the University suspended or terminated.

I, Alexander Porter, Vice President for Administration and Finance/Chief Financial Officer at California State University Fullerton, hereby authorize and ensure the establishment, implementation, and maintenance of this WVPP and any associated documents or forms associated. I am committed to ensuring the safety and well-being of the University's employees and believe that the WVPP will help achieve that goal.

  
Alex Porter (Jun 21, 2024 11:07 PDT)

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Alexander Porter  
Vice President for Administration and Finance/Chief Financial Officer

06/21/2024

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Date