

BOSTON CITY COUNCIL

COMMITTEE ON EDUCATION

HEARING ON DOCKET #0587

**ORDER FOR A HEARING TO REVIEW ADMINISTRATIVE TRANSPARENCY,
EQUITABLE STUDENT REPRESENTATION, AND STUDENT FREEDOMS IN HIGHER
EDUCATION**

MARCH 23, 2026 | IANNELLA CHAMBER, 5TH FLOOR, BOSTON CITY HALL

WRITTEN STATEMENT OF ASHLEY M. GJOVIK, J.D.

Former Program Manager, Northeastern University
September 2023 – September 2024

This Committee convened a hearing to examine administrative transparency, student representation, and institutional accountability at Northeastern University (Docket #0587).¹ I write to provide testimony and documentary evidence that these concerns are well-founded, that Northeastern University's operations are frequently unlawful, and that NEU's administration actively suppresses complaints using the very departments responsible for investigating them.

I am a lawyer (holding a Juris Doctor degree and a certificate in Public International Law), a certified Project Management Professional, and a former senior engineering program manager with over a decade of experience leading global engineering programs and research and development operations, including at Apple and Nike (2012-2021). Prior to working for large corporations, I reported to a Chief Information Officer, and we launched a university-wide project portfolio management program at Portland State University in Portland, Oregon which was celebrated in white papers and case studies.²

I'm viewed as an expert in my field – and I writing to tell you that it's my professional assessment that Northeastern University is operating with a staggering deficiency of basic administrative procedures, workplace protections and norms, regulatory safeguards, minimum requirements for project

¹ “A hearing to discuss issues related to administrative transparency, student representation, and student rights at Northeastern University and other private higher education institutions in the City of Boston.” <https://www.boston.gov/public-notices/16570106>

² LinkedIn, Ashley M. Gjøvik, JD, PMP, <https://www.linkedin.com/in/ashleygjovik/>

administration, and issue reporting, tracking, and escalation workflows. Worse, based on my own first-hand experience (including the attached evidentiary packet), NEU is aware of these issues and, as we say in engineering, they views these systemic failures as a “feature” rather than a “bug.” All of these deficiencies allow the university to fabricate results, falsify findings, mislead in applications and public statements, coerce staff and students with the end goal of obtaining increased funding and revenue.

I was employed by Northeastern University from September 2023 through September 2024 as Program Manager for one of the first programs in NEU's "Impact Engine" initiative. See Exhibit A (Job Description). The Impact Engine initiative was created by NEU's then-Provost and described in NEU's own published strategic plan as designed to operate outside "traditional academic" structures, "untethered from the constraints of siloed disciplines," with "knowledge of the organizational structures and internal processes of the institution" explicitly declared "not required" — and with the formal tracked outputs including federal center grant acquisition.

In practice, the program I was hired to manage was an internally funded shell, created with NEU's own money, with no substantive research infrastructure, no project plans, and no defined scope, and structured as a vehicle to obtain large federal center grants by presenting the appearance of an already-operational program. To assist in manufacturing that appearance, NEU and the program's faculty leadership retroactively claimed pre-existing federal grants awarded to other faculty members as program outputs, and integrated those grants with program resources, without disclosing this arrangement to those funding agencies. Those grants had their own scope and obligations, and their own federal reporting requirements. They were absorbed into the program's public narrative solely to support grant applications for new, larger federal awards and in doing so implicated dozens of grants and hundreds of grant applications in a systemic misconduct and intentional regulatory violations.

What I witnessed and documented during less than one year of employment at NEU was the operational execution of that scheme. It was a pervasive, institutional, and deliberate disregard for legal and regulatory obligations. NEU administration treated regulatory compliance and educational accountability as threats to be suppressed.

I reported what I witnessed, insisted on investigations, and pressed for correction. For example, on January 22, 2024, I filed a formal ethics complaint with NEU's EthicsPoint system — report number 908198842201, categorized as Financial Matters and Fiscal Misconduct — identifying what I described as "apparent intentional, repeated violations of numerous university policies including Ethical Conduct; Professional Standards and Business Conduct; Confidentiality; Use of University Funds; and Openness in Research." See Exhibit C (EthicsPoint Complaint, January 22, 2024).

The complaint documented issues including that there were no project plans or detailed program requirements and the leadership “does not want any project plans or work plans for the project”; “lack of documentation for almost all purchases”; the “MOU outline of work is not accurate but [the program leadership] refuses to revise it despite repeated requests from Office of the Provost”; my supervisor instructed me to not share any project information with the project leadership including not sharing budget

information with the steering committee so they “won’t know what is happening”; my supervisor complained that team members were sharing status updates with each other and wanted them to stop; forbid students from sharing updates on their research despite “repeated requests for this information”; told staff they will not receive their full salaries unless they advocate for grant funding and also lobby faculty to include them in the faculty’s grant applications; and the principal investigator, my supervisor, had submitted a knowingly inaccurate forecast to the Provost’s Office with a stated intent to avoid drafting required documentation and upon me objecting to her conduct “says that I work for her and I’m not ‘a compliance officer’,” and had stated that she “doesn’t like paperwork” as her justification for suppressing a required disclosures. (Exhibit C: NEU EthicsPoint Complaint, Report No. 908198842201, Financial Matters and Fiscal Misconduct, January 22, 2024).

When I tried to raise compliance concerns with my supervisor directly, among other problematic statements, she told me I was “not a compliance officer,” that I “work for faculty” and need to “make faculty’s jobs easier,” and that they do not have to follow any rules. I spoke with the Provost’s Office shortly before filing the Jan. 22 2024 complaint and leadership in that office disclosed they suspected this misconduct was occurring for some time but had been unable to prove it — and that my report confirmed the conduct was also intentional rather than negligence.

I contacted NEU’s Audit & Advisory Services department when I filed the Jan. 22 2024 EthicsPoint complaint, requesting an investigation. I provided documentation and evidence directly to their executive leadership, who spoke with me over video chat, confirmed receipt, and requested ongoing updates. See Exhibit D (NEU Audit & Advisory Services Correspondence, January–May 2024). In a February 2, 2024 email to NEU’s audit team, I documented the principal investigator was still refusing to comply with basic obligations and when pressed on the matter, had stated that “because she’s a tenured professor she can’t be disciplined unless she commits crimes.” That statement, made directly to her Program Manager and documented in real time to NEU’s own internal audit function, reflects the institutional operating assumption under which the program was run.

Between January and May 2024, I provided NEU administrators with evidence, documentation, and direct accounts of the violations I had identified. NEU claimed to investigate but did not investigate. NEU instead authorized the misconduct, and subsequent concealment and retaliation. I then filed complaints with government agencies. My complaints triggered multiple federal agencies to open investigations, agents interviewed me and collected evidence, the NLRB found merit in charges that NEU maintained unlawful, coercive labor policies and is now preparing to prosecute NEU for those violations, and a concurrent federal audit by NSF confirmed failures that aligned precisely with the concerns I was raising internally while NEU was retaliating against me for raising them at the same time.³

The violations I personally witnessed and reported during less than one year of employment span an extraordinary range of regulatory domains. NEU permitted a large lithium battery to explode in a public

³ Boston Globe, *Northeastern to refund \$616k after NSF audit flags mismanagement*, Feb. 16 2025, <https://www.bostonglobe.com/2025/02/16/metro/northeastern-financial-mismanagement-audit/>

campus parking lot, failed to warn the public or surrounding community, and transported the damaged battery off-site after unilaterally declaring it non-hazardous waste — in violation of the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq., and its implementing regulations at 40 CFR Part 261, which prohibit self-classification of hazardous waste by generators and require manifested transport by licensed carriers. US EPA and MassDEP both investigated this complaint, along with evidence including an audio recording of a meeting discussing knowledge that it was RCRA hazardous waste and a public safety hazard. This was alleged to be a potential environmental crime.

NEU required staff to work in Nightingale Hall, 105-107 Forsyth Street, Boston — a building NEU has owned since 1961, which it now acknowledges contains widespread asbestos-containing materials throughout the structure, which it has never fully assessed in violation of 29 CFR § 1910.1001(j)(3)(i), which requires employers to identify and record the presence and location of all asbestos-containing materials in the workplace, and which sits adjacent to an active campus power plant that NEU's own EPA filings report emits approximately 27,749 metric tons of carbon dioxide annually along with carbon monoxide, nitrogen oxides, and methane — and NEU simultaneously refused to provide those staff with potable drinking water at their worksite, in violation of 29 CFR § 1910.141(b)(1)(i). Faculty members in that same building, as quoted in the Huntington News in April 2024, stated on record that they would not complain about the asbestos conditions because they feared retaliation — and that they hoped students would protest on their behalf because students were less vulnerable to reprisal than they were. MassDEP and OSHA investigated these complaints.

The NEU Impact Engine directed staff not to comply with mandatory background check and minor protection procedures for program activities conducted with children and vulnerable populations in Boston, Revere, and Chelsea — communities that are predominantly non-white and non-English speaking. The Impact Engine conducted human subjects research involving members of the public, including children, without completing required Institutional Review Board consultation – or even notifying the IRB about the existence of the program due to a stated expectation the IRB would deny the program. This was in violation of the federal Common Rule, 45 CFR Part 46, which requires IRB review of all human subjects research conducted by institutions receiving federal funding; and in violation of 45 CFR § 46.408, which imposes specific requirements for research involving children as subjects. When I raised concerns about the above, the principal investigator and steering committee refused IRB consultation and directed me to allow the faculty committee to decide unilaterally whether to involve the IRB at their own private discretion, regardless of if human research was occurring or not.

There was also an instance where a large amount of grant funding was being managed in the name of individual faculty members rather than in NEU's institutional accounts (where the grant was awarded to), in direct violation of 2 CFR § 200.303 and 2 CFR § 200.305, and bordering embezzlement. When I identified and reported these failures, NEU did not report the violations to the funding agencies as required by 2 CFR § 200.338, would not explain what they were doing to correct the issue, and the legal team had expressed serious concerns about lack of oversight by the Civil and Environmental Engineering department allowing such an issue to occur. This was occurring while the Impact Engine leadership were

also pressing for a personal allocation of Indirect Cost grant funding (IDC) which is intended for university operations but was requested as a “kickback,” and then with express instructions to not document their use of the term “kickback.” They wanted a kickback for their participation in the grant fraud scheme and for that kickback to be funded by the federal government.

In 2015, the Department of Justice settled with NEU for \$2.7 million over regulatory violations resulting because “Northeastern failed to protect the government’s interest and lacked adequate control over a researcher’s ability to spend millions of taxpayer dollars.”⁴ During the period of misconduct that I witnessed, NEU was on notice from the US DOJ about grant compliance issues and had just completed a “five-year compliance agreement to ensure that proper oversight and safeguards are in place for future research awards.” NEU’s misconduct was knowing, intentional, and deliberate. Submission of grant claims while maintaining these conditions constituted violation of the False Claims Act, 31 U.S.C. § 3729.

The student’s rights are violated and educational interests harm by all of these violations and misconduct, and they are often forced to participate in and be complicity with the misconduct, through a variety of methods of coercion, duress, and what could be considered extortion. For instance, graduate student researchers and post-doctoral staff on temporary visas were assigned to conduct work in support of this scheme with only 1 or 2 project team members holding permanent residence or citizenship. Faculty members controlled those students’ employment, funding, PhD degrees, and their ability to be present in the United States where they were currently living – holding the power to trigger deportation as an implied threat at all times. Further, the research these students performed was the basis for their dissertations and their professional identities – so students who reported program misconduct would be reporting that their own academic work was fraudulent. Students who departed and reported on the work afterward faced the same consequence. International students carried the additional exposure of visa status dependent on continued institutional sponsorship on top of the other implicit threats and coercion.

I was not, at the time I accepted the position at NEU, in a position of professional strength. I am a federal environmental whistleblower in ongoing litigation against my prior employer, Apple Inc., arising from the retaliation I experienced from Apple Inc.⁵ Following Apple’s extremely public termination of my employment in 2021, I applied for positions across the country and received rejections from multiple employers citing Apple’s position and/or my active litigation against Apple as the reason they could not proceed. The NEU position was, under those circumstances, the only employment available to me. My NEU supervisor was aware of this. She stated that she was able to hire me because the program’s structure allowed her to bypass the department and standard HR processes — and that NEU would not otherwise

⁴ US DOJ, *Northeastern University to Pay \$2.7 Million for Failing to Account for Federal Research Funds*, August 18, 2015, <https://www.justice.gov/usao-ma/pr/northeastern-university-pay-27-million-failing-account-federal-research-funds> (“According to the settlement agreement, Northeastern University agreed to pay \$2.7 million and to submit to a five-year compliance agreement to ensure that proper oversight and safeguards are in place for future research awards.”)

⁵ i.e., *Ashley M. Gjovik v. Apple Inc.*, Case No. 3:23-cv-04597-EMC (N.D. Cal.) (ongoing whistleblower and labor retaliation litigation arising from Apple Inc.’s termination of my employment in September 2021).

have hired me given my public labor dispute with Apple. She expressed that she hired me in part because I was professionally and financially vulnerable. She also offered me a salary representing approximately twenty-seven percent of my prior compensation. When it was subsequently disclosed that the Program Manager position was budgeted for a higher salary, my supervisor acknowledged that she had deliberately paid me less than the position's budgeted rate, knowing that the offered salary was a fraction of my prior earnings and that I was financially dependent on the position. NEU's conduct during and after my employment has been financially devastating: following my termination I was compelled to file for Chapter 7 bankruptcy and am currently without permanent housing.

NEU's retaliation was not subtle. I received a positive mid-year performance review in December 2023. See Exhibit B (Annual Performance Review, FY2024). The EthicsPoint complaint was filed on January 22, 2024. The negative annual review was issued fifty-eight days later, on March 21, 2024. The only material events in those fifty-eight days were my formal complaints to university administrators and my advocacy on behalf of program staff. The annual review documents those complaints as the basis for the negative assessment. In response to my complaints about the Impact Engine administration, my review states that there were "major concerns and issues" about my program management because of my "communication with faculty/staff, the Provost's Office and other offices" where "processes or policies that [I] attempted to establish have complicated things and increased the workflow and faculty's workload," that my "mis-interpretation of university policies and rules," "mis-interpretation of administrative procedures and university policies/regulations," and "mis-communication with faculty and staff, have created major roadblocks for the [program] team," that it is "undesirable that someone in a coordinating role create conflicts, tension, and frictions among people" and stated that I "need to consult with the supervisor and steering committee" before communicating with the Office of the Provost, Legal, Human Resources, Research Compliance, or other university offices.

NEU's performance review instructed me that any complaints or concerns about the program must be routed through the supervisor — the same supervisor who was the subject of the complaints — before I could bring them to HR, Audit, Legal, or the Provost's Office. The Provost's Office had confirmed the misconduct was real and intentional. NEU's Audit & Advisory Services had confirmed it was actively reviewing my submissions. HR had confirmed it was looking into the retaliation claim. The principal investigator's written response to all of that was to insert herself as the mandatory approval authority for any further complaints about herself. The review simultaneously characterized every compliance question I had raised — to any of those groups — as evidence of my own performance failures.

The program's documented risk, per NEU's own written assessment, was not its serial regulatory violations. It was the Program Manager asking about the violations and reporting them to the university's compliance teams. The review further instructed me not to pursue NEU's CITI training — the university's required Responsible Conduct of Research program specifically covering human subjects research compliance — for the human subjects research program I was hired to manage. The retaliation itself was additional substantive regulatory and ethical violations.

On March 21, 2024 — the same day the review was issued — I notified NEU's Audit & Advisory Services in writing that retaliation had started and was "becoming increasingly severe," and I submitted a formal written objection to NEU's HR department under the subject line "Performance Review: Facially Retaliatory Statements," identifying specific provisions as pretextual and demanding a formal complaint process. See Exhibit D. The HR representative who met with me that day told me she did not know whether NEU had any process by which an employee could contest a performance review — which was either a false statement or more evidence of the university's failure to have required processes. The NLRB field attorney handling my charges subsequently told me that this performance review was the most direct documentary evidence of retaliation she had encountered in her tenure at the Board and she expected the agency would take direct action against NEU over it.

After "investigating" for over a month without speaking to me and offering no evidence any investigation occurred, on May 10, 2024, NEU's Vice President of Audit & Advisory Services, Tricia Wood, transmitted the institution's formal conclusion to me. After receiving four months of documentation, multiple evidence submissions, the performance review, and formal complaints, she wrote: the operational compliance concerns "do not rise to the level of misconduct or intentional avoidance of compliance measures," and the annual review was "substantiated by actual performance and was not influenced by any form of retaliation." See Exhibit D. That conclusion was not limited to the underlying compliance failures. It encompassed the performance review itself — including its directive that I obtain supervisory approval before bringing complaints about my supervisor to HR, Legal, Audit, or the Provost's Office. NEU's Vice President of Audit & Advisory Services reviewed a performance document that prohibited an employee from reporting suspected misconduct to the university's own investigative bodies without the subject of the complaints pre-approving those reports — and concluded that this was legitimate performance management, not misconduct.

In a single letter, NEU's internal audit function endorsed the gatekeeper structure, cleared the underlying violations, and closed the investigation. Four days later, Tricia Wood left Northeastern University. The NLRB subsequently found merit in the exact policy violations NEU's audit VP had cleared. At least six federal agencies (including the FBI) and one state agency opened investigations into the exact conduct NEU concluded did not rise to the level of misconduct. NEU's institutional self-clearance is documented, dated, and directly contradicted by every agency that found the complaints actionable and independently examined the same record.

I commenced PFML-protected medical leave on June 12, 2024, following and triggered by a period of NEU's escalating retaliation and institutional hostility that precipitated a serious medical crisis due to my preexisting disabilities and injuries (including debilitating PTSD, depression, and anxiety). See Exhibit E (PFML Leave Documentation and Extension). On August 7, 2024, NEU's own Associate Director of Absence Management extended my leave through November 12, 2024. Thirty-five days later, on September 11, 2024 — with ten weeks of NEU-approved protected leave still remaining — the Impact Engine's principal investigator emailed me to inform me that a decision had been made not to renew my appointment. The formal non-renewal letter followed on September 12, 2024, signed by Gregory Abowd,

Dean of the College of Engineering, citing "documented performance concerns" as the stated basis and designating September 27, 2024 as my last day. See Exhibit F (Termination Notice).

NEU terminated my employment seven weeks before the leave extension it had itself granted was set to expire. The stated basis — "documented performance concerns" — refers to the March 2024 performance review documenting my compliance complaints as performance deficiencies. The decision was made and communicated at the dean level of the College of Engineering. The termination of an employee during PFML-protected leave violates M.G.L. c. 175M, § 2(c), which prohibits interference with, restraint of, or denial of the exercise of any right provided under that Act.

The termination constitutes disability-based discharge under Boston Human Rights Ordinance CBC 12-9.3, which prohibits discharge on the basis of disability by any covered employer in the City of Boston. NEU is a covered employer under that ordinance. The discharge also constitutes retaliation under CBC 12-9.8, which independently prohibits adverse action against any employee who opposed a practice made unlawful under the ordinance or participated in any proceeding thereunder.

Under Boston's Wage Theft Ordinance, NEU is required as a recipient of city assistance to certify compliance with the National Labor Relations Act. The NLRB has found merit in charges that NEU maintained unlawfully overbroad, coercive labor policies under the standard of *Stericycle, Inc.*, 372 NLRB No. 113 (2023) — see Exhibit H (NLRB Merit Letter) — and has initiated mandatory settlement proceedings. See Exhibit G (NLRB Charges). NEU must settle those charges or face a formal federal complaint. That certification cannot currently be made in good faith. NEU also fired me with an open NLRB charge against it for the proceeding retaliation and the unlawful policies — constituting an unfair labor practice under Section 8(a)(4).

The NLRB's partial dismissal letter states on the record that the evidence indicates my termination was motivated by my reporting of regulatory compliance issues to university administration. NLRB then declined jurisdiction on the ground that such reporting may not constitute protected concerted activity under the NLRA, but instead would be protected activity under other statutes. The federal agency charged with investigating my termination identified whistleblower retaliation as the probable cause and declined to act on the related labor violations. The appear was also contrary to the previous statements made by the NLRB Board Agent indicating NLRB would find unfair labor practices and unlawful retaliation based on the facts in my case — then reversing courts and issuing an dismissal of those same claims with conflicting statements, material omissions, false statements of facts and law, and completely unnecessary disclosure of my personal information. It was as if someone made NLRB changes its mind outside of the confines of NLRB's legal framework and procedural processes.

My appeal of that dismissal, Exhibit J, raises additional concerns: the NLRB field attorney assigned to investigate my charges is a graduate of Northeastern University School of Law.⁶ The dismissal letter contains gratuitous and legally unnecessary disclosures of my private medical and disability information; disclosures I have challenged in the appeal as potential Privacy Act violations. Further, the letter's reasoning, if adopted as precedent, would effectively establish that an employer may terminate an employee for reporting federal grant fraud without NLRB consequence, even if there is protected concerted activity and evidence of retaliation for that activity, whereas whistleblowing somehow nullifies NLRA protections. However, despite this, NLRB still claims to be moving forward on the policy violations – but has not issued a complaint or provided an update for nearly a year – assumably immobilized by pressure from NEU to conceal and abandon the violations.

My reports to federal environmental and safety agencies triggered independent investigative action. The EPA OIG opened an investigation under Complaint No. 2025-0376, conducted a formal recorded interview with me in January 2025, and forwarded my ECHO environmental report and interview recording to the EPA Office of Investigations. See Exhibit N (EPA OIG Complaint and Correspondence). I spoke with the DOJ civil litigation team, presenting my testimony as evidence ehta the issues underlying their 2015 enforcement action were still occurring – DOJ asked me to contact FBI and provide them my evidence, which I did. An FBI Special Agent interviewed me in November 2024 regarding research and grant fraud at NEU and confirmed receipt of my evidence submissions, and in Dec. 2024 I filed a 200+ page witness statement. See Exhibit K (FBI Correspondence). I also filed complaints with OSHA, which opened an investigation under Complaint No. 2216706, see Exhibit P (OSHA Complaint and Correspondence), and with MassDEP, see Exhibit O (MassDEP Correspondence), regarding the asbestos and environmental conditions at Nightingale Hall. I filed complaints with the NSF OIG, see Exhibit L (NSF OIG Complaint), and with the HHS OIG, see Exhibit M (HHS OIG Complaint), regarding research compliance and grant administration failures in the program described herein.

In 2015, the U.S. Department of Justice reached a \$2.7 million settlement with Northeastern University for failing to account for federal research funds, accompanied by a five-year compliance agreement requiring NEU to implement adequate oversight and safeguards. See Exhibit L (DOJ Press Release, 2015). The institutional failures that settlement was designed to remedy are the same categories I identified and reported internally in January 2024 – and both DOJ and FBI recognized this as well.

The Impact Engine structure described in this statement is a direct recurrence, and formalized workflow for issues. It's an internally administered program concept, without any substance or accountability, designed to generate federal grant revenue without the oversight, documentation, or institutional controls those grants legally require. While NEU was retaliating against me in the first half of 2024 for raising those concerns, NSF was conducting an independent audit of NEU research projects;

⁶ Caroline Leonard, Field Attorney, National Labor Relations Board. LinkedIn profile, <https://www.linkedin.com/in/caroline-leonard-9395a194/> (captured March 22, 2026), reflects education at Northeastern University School of Law.

that audit, concluded in 2025, issued twenty recommendations addressing accounting documentation, financial policies, and principal investigator verification of expenditures — confirming that the compliance failures I reported were real, were material, and were occurring during an active federal audit. NEU's retaliatory conduct against me during that period served to suppress internally the very concerns that NSF's external auditors were concurrently identifying.

This Committee convened to examine how NEU exercises institutional power over the workers and students in its community. The record I have submitted answers that question with specificity. NEU constructed an internally funded shell program, the "Impact Engines," administered at the provost level and bypassing the departments, designed from inception to operate outside regulatory and policy constraints and to use the appearance of institutional activity to obtain federal center grants – while coercing staff and students to participate, making staff and students complicit in the misconduct, and using a variety of extortionate mechanisms to ensure their silence about what the witness and ensure their life-long compliance with the administration's scheme and unlawful policies.

When a Program Manager for a Impact Engine identified and reported those violations, NEU's response — documented in writing — was to prohibit her from speaking to legal, HR, or compliance; to characterize her federal compliance reports as performance deficiencies; to demand she stop creating program documentation; to terminate her employment while she was on protected medical leave; and to do so citing the compliance reports as the stated basis for "misconduct".

Six federal agencies have since opened investigations into the conduct she reported. The NLRB has found NEU's labor policies unlawful and is preparing to prosecute. The March 2024 performance review — a document NEU issued, signed, and affirmed through its administrators — is simultaneously evidence of retaliation, a written record of institutional contempt for legal obligations, arising out of a large "Impact Engine" supposedly dedicated to serving the Boston community, and as a demonstration of exactly what this Council is examining: an institution that has decided it is not accountable to the rules that govern everyone else in the City of Boston.

Respectfully submitted,

/s/ Ashley M. Gjovik

Ashley M. Gjovik, JD

Date: March 23, 2026

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EXHIBIT INDEX

I, Ashley M. Gjovik, declare under penalty of perjury under the laws of the Commonwealth of Massachusetts that the foregoing is true and correct to the best of my knowledge, information, and belief, and that the exhibits identified herein are authentic copies of documents within my possession. Executed March 23 2026 in San José, California.

EXHIBITS:

- Exhibit A: Job Description — Program Manager, iSUPER Impact Engine, Northeastern University
- Exhibit B: NEU Annual Performance Review, FY2024
- Exhibit C: NEU EthicsPoint Complaint, Report No. 908198842201, Financial Matters and Fiscal Misconduct, January 22, 2024
- Exhibit D: NEU Audit & Advisory Services Correspondence, January–May 2024, including May 10, 2024 Audit Conclusion Letter from Vice President Tricia Wood
- Exhibit E: PFML Leave Documentation, June 2024; NEU Leave Extension Approval Through November 12, 2024, August 7, 2024
- Exhibit F: NEU Termination Notice, August 2024
- Exhibit G: NLRB Charges, Cases 01-CA-342355 and 01-CA-350371
- Exhibit H: NLRB Letter Confirming Merit Finding on Unlawful Policy Allegations and Initiating Settlement Proceedings
- Exhibit I: NLRB Partial Dismissal Letter, Cases 01-CA-342355 and 01-CA-350371, August 5, 2025
- Exhibit J: Charging Party's Appeal of Dismissal, Cases 01-CA-342355 and 01-CA-350371, August 19, 2025
- Exhibit K: Correspondence with FBI Special Agent, 11–12/2024 & Excerpt from 12/24 Statement
- Exhibit L: NSF OIG Complaint; U.S. DOJ Press Release, Northeastern University \$2.7M Federal Research Funds Settlement, 2015
- Exhibit M: HHS OIG Complaint
- Exhibit N: EPA OIG Complaint No. 2025-0376; EPA OIG Correspondence, January 2025
- Exhibit O: MassDEP Public Records Response and Correspondence
- Exhibit P: OSHA Complaint No. 2216706 and Correspondence