

1 ADVOCATES FOR FAITH & FREEDOM

2 Robert H. Tyler (SBN 179572)

3 btyler@faith-freedom.com

4 Julianne Fleischer (SBN 337006)

5 jfleischer@faith-freedom.com

6 25026 Las Brisas Road

7 Murrieta, California 92562

8 Telephone: (951) 600.2733

9 Facsimile: (951) 600.4996

10 TYLER LAW, LLP

11 Emma F. Plotnik (SBN 341718)

12 eplotnik@tylerlawllp.com

13 25026 Las Brisas Road

14 Murrieta, California 92562

15 Telephone: (951) 600.2733

16 Facsimile: (951) 600.4996

17 Attorneys for Petitioners Election Integrity Project California,
18 Inc., et al.

19 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

20 **FOR THE COUNTY SACRAMENTO**

21 ELECTION INTEGRITY PROJECT
22 CALIFORNIA, INC.; LARRY LEWIS, an
23 individual; COLETTE CASEY, an individual;
24 ELLEN SWENSEN, an individual; THOMAS
25 D. PAVICH an individual; and CHARLES
26 SHINN, an individual,

27 Petitioners,

28 v.

29 SHIRLEY WEBER, CALIFORNIA
30 SECRETARY OF STATE; BOB PAGE,
31 ORANGE COUNTY REGISTRAR OF
32 VOTERS; DEAN LOGAN, LOS ANGELES
33 COUNTY REGISTRAR-
34 RECORDER/COUNTY CLERK; ART
35 TINOCO, RIVERSIDE COUNTY
36 REGISTRAR OF VOTERS; AIMEE X.
37 EXPINOZA, KERN COUNTY AUDITOR-
38 CONTROLLER-COUNTY CLERK; and
39 MICHELLE BALDWIN, TULARE COUNTY
40 REGISTRAR OF VOTERS,

41 Respondents,

Case No.:

**DECLARATION OF THOMAS D.
PAVICH IN SUPPORT OF VERIFIED
PETITION FOR WRIT OF MANDATE**

PRIORITY ELECTION MATTER
(Cal. Elec. Code § 13314)

ACTION REQUIRED BY:
November 6, 2024

42 I, Thomas D. Pavich, the undersigned, declare as follows:

1 1. I am a United States Citizen over the age of eighteen years and am a party to the
2 above-referenced action. I make this declaration based on my own firsthand knowledge unless stated
3 otherwise. If called to testify as a witness, I could and would testify competently thereto.

4 2. I make this declaration in support of Petitioners' Verified Peremptory Writ of
5 Mandate.

6 3. I am a registered voter in the County of Tulare, State of California and am currently
7 a resident of Tulare County, California.

8 4. I voted in the 2022 midterm election, which was held on November 8, 2022, and was
9 a Tulare County resident prior to, and at the time of, the November 2022 election. I also intend to
10 vote in the 2024 general election on November 5, 2024.

11 5. I am a volunteer election observer for Election Integrity Project California
12 ("EIPCa"), a Petitioner in this action. The EIPCa is a nonpartisan nonprofit 501(c)(3) nonprofit
13 public benefit corporation committed to defending, through education, research, and advocacy the
14 civil rights of United States citizens to fully participate in the election process under Federal and
15 state law. I have volunteered with EIPCa since January 2012. I formerly lived in Kern County and
16 have served as the EIPCa Coordinator for Kern County since 2012.

17 6. I participated in EIPCa's Citizen Observation Education program prior to serving as
18 an election observer and completed this program in May 2012. Through participating in this
19 program, I was trained on how to observe the election processes and document any observed election
20 irregularities.

21 7. I was a volunteer election observer for EIPCa for Kern County, Tulare County, and
22 Kings County, California for elections from 2021 to 2024.

23 8. As both a voter and a volunteer observer of elections, I understand the importance of
24 ensuring that each vote cast by a voter counts. Thus, I bring the present Petition to request that my
25 county elections official and the Secretary of State participate in an accurate count and proper
26 certification of the votes cast in the November 2024 election.

27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Executed on October 29, 2024, at Richgrove, California.


Thomas Pavich (Oct 29, 2024 14:45 PDT)
Thomas D. Pavich, DECLARANT

Dec of Pavich ISO

Final Audit Report

2024-10-29

Created:	2024-10-29
By:	Susan Kenney (skenney@tylerlawllp.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA7eLA0mcprsHMGNnvaj2_v6AhUDYbKK-4

"Dec of Pavich ISO" History

-  Document created by Susan Kenney (skenney@tylerlawllp.com)
2024-10-29 - 3:56:44 PM GMT
-  Document emailed to Thomas Pavich (tpavich@aol.com) for signature
2024-10-29 - 3:56:48 PM GMT
-  Email viewed by Thomas Pavich (tpavich@aol.com)
2024-10-29 - 9:42:51 PM GMT
-  Document e-signed by Thomas Pavich (tpavich@aol.com)
Signature Date: 2024-10-29 - 9:45:33 PM GMT - Time Source: server
-  Agreement completed.
2024-10-29 - 9:45:33 PM GMT