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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SACRAMENTO
12

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14 **ELECTION INTEGRITY PROJECT
CALIFORNIA, INC., et al.,**

15
16 Petitioners,

17 v.

18 **SHIRLEY WEBER, CALIFORNIA
SECRETARY OF STATE, et al.,**

19
20 Respondents.

Case No. 24WM000168

**RESPONDENT SECRETARY OF
STATE'S ANSWER TO PETITIONERS'
VERIFIED PETITION FOR
PEREMPTORY WRIT OF MANDATE**

Dept: 21
Judge: Hon. Shelleyanne W.L. Chang
Trial Date: None set.
Action Filed: October 30, 2024

1 Respondent Dr. Shirley D. Weber, in her official capacity as the California Secretary of
2 State, answers the verified petition for peremptory writ of mandate as follows:

3 **I. INTRODUCTION¹**

4 1. Answering paragraph 1, respondent lacks sufficient information or belief to
5 respond to the allegations contained in said paragraph and therefore denies those allegations.

6 2. Answering paragraph 2, respondent admits that members of respondent’s staff
7 received two letters from petitioner EIPCa, dated September 6, 2024 and September 20, 2024.
8 Respondent admits that respondent provided petitioner EIPCa with the Public Voter Registration
9 Data Request file (“PVRDR file”) in June of 2024. Except as expressly admitted, respondent
10 denies each and every allegation contained in paragraph 2.

11 3. Answering paragraph 3, respondent admits that, as of the date of this Answer,
12 respondent has not provided petitioner EIPCa with a written response to the letters respondent’s
13 staff received from petitioner EIPCa dated September 6, 2024 and September 20, 2024,
14 respectively. Except as expressly admitted, respondent denies each and every allegation contained
15 in paragraph 3.

16 **II. PARTIES**

17 4. Answering paragraph 4, respondent lacks sufficient information or belief to
18 respond to the allegations contained in said paragraph and therefore denies those allegations.

19 5. Answering paragraph 5, respondent lacks sufficient information or belief to
20 respond to the allegations contained in said paragraph and therefore denies those allegations.

21 6. Answering paragraph 6, respondent lacks sufficient information or belief to
22 respond to the allegations contained in said paragraph and therefore denies those allegations.

23 7. Answering paragraph 7, respondent lacks sufficient information or belief to
24 respond to the allegations contained in said paragraph and therefore denies those allegations.

25 8. Answering paragraph 8, respondent lacks sufficient information or belief to
26 respond to the allegations contained in said paragraph and therefore denies those allegations.

27 ¹ Respondent reproduces the headings and subheadings in the verified petition for the
28 court’s reference and convenience. To the extent any headings or subheadings in the verified
petition contain allegations of material fact, respondent denies those allegations.

1 9. Answering paragraph 9, respondent lacks sufficient information or belief to
2 respond to the allegations contained in said paragraph and therefore denies those allegations.

3 10. Answering paragraph 10, respondent admits that, as the Secretary of State, she
4 is the chief elections officer of California and that the cited statutes and appellate decision exist
5 and speak for themselves. Except as expressly admitted, respondent denies each and every
6 allegation contained in paragraph 10.

7 11. Answering paragraph 11, respondent admits that respondent Dean Logan is the
8 Los Angeles County Registrar Recorder/County Clerk and that the cited statutes speak for
9 themselves. Except as expressly admitted, respondent denies each and every allegation contained
10 in paragraph 11.

11 12. Answering paragraph 12, respondent admits that respondent Bob Page is the
12 Orange County Registrar of Voters and that the cited statutes speak for themselves. Except as
13 expressly admitted, respondent denies each and every allegation contained in paragraph 12.

14 13. Answering paragraph 13, respondent admits that respondent Art Tinoco is the
15 Riverside County Registrar of Voters and that the cited statutes speak for themselves. Except as
16 expressly admitted, respondent denies each and every allegation contained in paragraph 13.

17 14. Answering paragraph 14, respondent admits that respondent Aimee X.
18 Espinoza is the Kern County Auditor – Controller – County Clerk and that the cited statutes speak
19 for themselves. Except as expressly admitted, respondent denies each and every allegation
20 contained in paragraph 14.

21 15. Answering paragraph 15, respondent admits that respondent Michelle Baldwin
22 is the Tulare County Registrar of Voters and that the cited statutes speak for themselves. Except
23 as expressly admitted, respondent denies each and every allegation contained in paragraph 15.

24 16. Answering paragraph 16, the allegations contained in said paragraph are
25 petitioners' summary of the instant writ petition. Petitioners' writ petition speaks for itself. To the
26 extent said paragraph contains any allegations of material fact, respondent denies those
27 allegations.

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1 **III. JURISDICTION AND VENUE**

2 17. Answering paragraph 17, the allegations contained in said paragraph constitute
3 legal conclusions and opinions to which no answer is required. Respondent denies that
4 “Jurisdiction is also proper under Elections Code § 13314(a).” To the extent said paragraph
5 contains any allegations of material fact, respondent denies those allegations.

6 18. Answering paragraph 18, the allegations contained in said paragraph constitute
7 legal conclusions and opinions to which no answer is required. Further answering paragraph 18,
8 said paragraph also contains petitioners’ summary and argument regarding a certain statutory
9 provision. That provision speaks for itself. To the extent said paragraph contains any allegations
10 of material fact, respondent denies those allegations.

11 **IV. REQUEST FOR PRIORITY**

12 19. Answering paragraph 19, respondent admits that the cited statutes exist and
13 speak for themselves. Respondent denies that Code of Civil Procedure § 35 or Elections Code §
14 13314 give this action precedence, and further denies that “time is of the essence.” Respondent
15 affirmatively alleges that Code of Civil Procedure § 35 and Elections Code § 13314 are
16 inapplicable to this action. Except as expressly admitted, respondent denies each and every
17 allegation in paragraph 19.

18 **V. STANDING**

19 20. Answering paragraph 20, respondent admits that the cited statute and court
20 decision exist and speak for themselves. Respondent denies each and every remaining allegation
21 in paragraph 20.

22 21. Answering paragraph 21, respondent admits that the cited statutes exist and
23 speak for themselves. Respondent lacks sufficient information or belief to respond to the
24 allegations that the individual petitioners are United States citizens aged 18 or older, that they
25 reside in the respondent-registrar/clerks’ counties, or that they plan to vote in the 2024 election,
26 and deny the allegations on that basis. Respondent denies each and every remaining allegation in
27 Paragraph 21.

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1 **VI. FACTUAL BACKGROUND**

2 **A. EIPCA’s Application for Voter List Or File To The Secretary of State**

3 22. Answering paragraph 22, respondent admits that she, as the Secretary of State,
4 and the respondent registrar/county clerks are responsible for conducting elections, counting
5 votes, and certifying election results. Except as expressly admitted, respondent denies each and
6 every allegation contained in paragraph 22.

7 23. Answering paragraph 23, respondent lacks sufficient information or belief to
8 respond to the allegations contained in said paragraph and therefore denies those allegations.

9 24. Answering paragraph 24, respondent admits that the cited statutes and
10 regulations exist and speak for themselves, and that EIPCa submitted a Public Voter Registration
11 Data Request (“PVRDR”). Respondent further admits that the application requested each voter’s
12 name, address, birthdate, state Registration ID number, precinct, voting method, and current
13 registration status. Except as expressly admitted, respondent denies each and every allegation
14 contained in paragraph 24.

15 25. Answering paragraph 25, respondent admits that members of her office
16 corresponded with EIPCa about its data request, and that respondent ultimately provided EIPCa
17 with the PVRDR file on June 28, 2024. Respondent lacks sufficient information or belief to
18 respond to the allegation that EIPCa “conducted an audit of the data sets” and therefore denies the
19 allegation. Except as expressly admitted, respondent denies each and every allegation contained
20 in paragraph 25.

21 **B. Petitioner’s Findings Regarding The June 2024 Accounting And The November 2022**
22 **Certified Accounting**

23 26. Answering paragraph 26, respondent lacks sufficient information or belief to
24 respond to the allegation that EIPCa “conducted an audit of the data” and denies the allegation on
25 that basis. Respondent denies each and every remaining allegation contained in paragraph 26.

26 27. Answering paragraph 27, respondent denies the allegation in paragraph 27.

27 28. Answering paragraph 28, respondent admits that following the November 2022
28 election her office published a document titled “Statement of Vote,” and that that document exists

1 and speaks for itself. Respondent also admits that she provided petitioners with the PVRDR file
2 in June 2024 and that data speaks for itself. Except as expressly admitted, respondent denies each
3 and every allegation contained in paragraph 28.

4 29. Answering paragraph 29, respondent admits that the November 2022 Statement
5 of Vote document and the June 2024 PVRDR file exist and speak for themselves. Except as
6 expressly admitted, respondent denies each and every allegation in paragraph 29.

7 30. Answering paragraph 30, respondent admits that both the November 2022
8 Statement of Vote document and the June 2024 PVRDR file exist and speak for themselves.
9 Except as expressly admitted, respondent denies each and every allegation in paragraph 30.

10 31. Answering paragraph 31, respondent admits that both the November 2022
11 Statement of Vote document and the June 2024 PVRDR file exist and speak for themselves.
12 Except as expressly admitted, respondent denies each and every allegation in paragraph 31.

13 32. Answering paragraph 32, respondent admits that both the November 2022
14 Statement of Vote document and the June 2024 PVRDR file exist and speak for themselves.
15 Except as expressly admitted, respondent denies each and every allegation in paragraph 32.

16 33. Answering paragraph 33, respondent admits that both the November 2022
17 Statement of Vote document and the June 2024 PVRDR file exist and speak for themselves.
18 Except as expressly admitted, respondent denies each and every allegation in paragraph 33.

19 34. Answering paragraph 34, respondent admits that both the November 2022
20 Statement of Vote document and the June 2024 PVRDR file exist and speak for themselves.
21 Except as expressly admitted, respondent denies each and every allegation in paragraph 34.

22 35. Answering paragraph 35, respondent lacks sufficient information or belief to
23 respond to the allegations regarding “EIPCa’s audit” contained in said paragraph and therefore
24 denies those allegations. Respondent admits that both the November 2022 Statement of Vote
25 document and the June 2024 PVRDR file exist and speak for themselves. Respondent denies that
26 there are any “discrepancies” between the two sets of information and denies “that thousands of
27 voters were disenfranchised of their right to have their vote counted and that thousands of invalid
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1 ballots were somehow counted.” Respondent denies each and every remaining allegation
2 contained in paragraph 35.

3 36. Answering paragraph 36, respondent lacks sufficient information or belief to
4 respond to the allegations about what EIPCa did, if anything, to explain or verify its “findings,”
5 and therefore denies the allegations. Respondent denies each and every remaining allegation
6 contained in paragraph 36, including but not limited to its allegation that it found any
7 “discrepancies.”

8 37. Answering paragraph 37, respondent admits that the cited statute and
9 regulations exist and speak for themselves, and that members of respondent’s staff received a
10 letter from EIPCa dated September 6, 2024. Except as expressly admitted, respondent denies each
11 and every allegation contained in paragraph 37.

12 38. Answering paragraph 38, respondent admits that members of respondent’s staff
13 received a letter from EIPCa on or around September 6, 2024 and that letter speaks for itself.
14 Respondent denies any remaining allegations in paragraph 38.

15 39. Answering paragraph 39, respondent admits that members of respondent’s staff
16 received a letter from EIPCa on or around September 20, 2024 and that letter speaks for itself.
17 Respondent denies any remaining allegations in paragraph 39.

18 40. Answering paragraph 40, respondent admits that respondent has not provided
19 EIPCa with a written response to the letters referenced in paragraphs 38 and 39. Except as
20 expressly admitted, respondent denies each and every allegation contained in paragraph 40.

21 **C. Grounds for Issuance Of Petitioners’ Requested Writ of Mandate**

22 41. Answering paragraph 41, respondent admits that the cited statutory provision
23 exists and speaks for itself. To the extent said paragraph contains any allegations of material fact,
24 respondent denies those allegations.

25 42. Answering paragraph 42, respondent admits that the cited statutory provision
26 exists and speaks for itself. To the extent said paragraph contains any allegations of material fact,
27 respondent denies those allegations.

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1 43. Answering paragraph 43, respondent admits that the cited statutory provision
2 exists and speaks for itself and that petitioners seek a peremptory writ. To the extent said
3 paragraph contains any allegations of material fact, respondent denies those allegations.

4 44. Answering paragraph 44, the allegations describe the relief petitioners are
5 seeking in this case and, as such, require no response. To the extent said paragraph contains any
6 allegations of material fact, respondent denies those allegations.

7 45. Answering paragraph 45, respondent admits that she is the chief elections
8 officer of the state of California and that the cited statutes exist and speak for themselves. Except
9 as expressly admitted, respondent denies each and every allegation contained in paragraph 45.

10 46. Answering paragraph 46, respondent admits that the cited statutes and
11 regulations exist and speak for themselves. To the extent said paragraph contains any allegations
12 of material fact, respondent denies those allegations.

13 47. Answering paragraph 47, the allegations contained in said paragraph constitute
14 petitioners' summary of the subject of their writ petition and, as such, require no response. To the
15 extent said paragraph contains any allegations of material fact, respondent denies those
16 allegations.

17 **D. Statutory Duties Of County Registrar-Recorders/County Clerks As Election Officials**

18 48. Answering paragraph 48 and footnote 1, respondent admits that the cited
19 statutes exist and speak for themselves. To the extent said paragraph and footnote 1 contain any
20 allegations of material fact, respondent denies those allegations.

21 49. Answering paragraph 49, respondent admits that the cited statutes exist and
22 speak for themselves. To the extent said paragraph contains any allegations of material fact,
23 respondent denies those allegations.

24 50. Answering paragraph 50, respondent admits that the cited regulation exists and
25 speaks for itself. To the extent said paragraph contains any allegations of material fact,
26 respondent denies those allegations.

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1 51. Answering paragraph 51, respondent admits that the cited regulations exist and
2 speak for themselves. To the extent said paragraph contains any allegations of material fact,
3 respondent denies those allegations.

4 52. Answering paragraph 52 and footnotes 2 and 3, respondent admits that the cited
5 regulations exist and speaks for themselves. To the extent said paragraph and footnotes 2 and 3
6 contain any allegations of material fact, respondent denies those allegations.

7 53. Answering paragraph 53, respondent admits that the cited regulation exists and
8 speaks for itself. To the extent said paragraph contains any allegations of material fact,
9 respondent denies those allegations.

10 54. Answering paragraph 54, respondent admits that the cited statutes exist and
11 speak for themselves. To the extent said paragraph contains any allegations of material fact,
12 respondent denies those allegations.

13 55. Answering paragraph 55, respondent admits that the cited statute exists and
14 speak for itself. To the extent said paragraph contains any allegations of material fact, respondent
15 denies those allegations.

16 56. Answering paragraph 56, respondent admits that the cited statute exists and
17 speak for itself. To the extent said paragraph contains any allegations of material fact, respondent
18 denies those allegations.

19 57. Answering paragraph 57, respondent admits that the cited cases exist and speak
20 for themselves. To the extent said paragraph contains any allegations of material fact, respondent
21 denies those allegations.

22 58. Answering paragraph 58, respondent admits that the cited statutes exist and
23 speak for themselves. To the extent said paragraph contains any allegations of material fact,
24 respondent denies those allegations.

25 59. Answering paragraph 59, respondent admits that the cited statute exists and
26 speaks for itself. To the extent said paragraph contains any allegations of material fact,
27 respondent denies those allegations.

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1 60. Answering paragraph 60, respondent admits that the cited statute exists and
2 speaks for itself. To the extent said paragraph contains any allegations of material fact,
3 respondent denies those allegations.

4 61. Answering paragraph 61, respondent admits that the cited statute exists and
5 speaks for itself. To the extent said paragraph contains any allegations of material fact,
6 respondent denies those allegations.

7 62. Answering paragraph 62, respondent admits that the cited statute exists and
8 speaks for itself. To the extent said paragraph contains any allegations of material fact,
9 respondent denies those allegations.

10 63. Answering paragraph 63, respondent admits that the cited statutes exist and
11 speak for themselves. To the extent said paragraph contains any allegations of material fact,
12 respondent denies those allegations.

13 64. Answering paragraph 64, respondent admits that the cited statutes exist and
14 speak for themselves. To the extent said paragraph contains any allegations of material fact,
15 respondent denies those allegations.

16 65. Answering paragraph 65, respondent admits that the cited statute exists and
17 speaks for itself. To the extent said paragraph contains any allegations of material fact,
18 respondent denies those allegations.

19 66. Answering paragraph 66, respondent admits that the cited statutes exist and
20 speak for themselves. To the extent said paragraph contains any allegations of material fact,
21 respondent denies those allegations.

22 67. Answering paragraph 67, respondent admits that the cited statutes exist and
23 speak for themselves. To the extent said paragraph contains any allegations of material fact,
24 respondent denies those allegations.

25 68. Answering paragraph 68, respondent admits that the cited statutes exist and
26 speaks for themselves. To the extent said paragraph contains any allegations of material fact,
27 respondent denies those allegations.

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1 69. Answering paragraph 69, respondent admits that the cited cases exist and speak
2 for themselves. To the extent said paragraph contains any allegations of material fact, respondent
3 denies those allegations.

4 70. Answering paragraph 70, respondent admits that the cited statute exists and
5 speaks for itself. To the extent said paragraph contains any allegations of material fact,
6 respondent denies those allegations.

7 71. Answering paragraph 71, respondent admits that the cited statutes exist and
8 speak for themselves. To the extent said paragraph contains any allegations of material fact,
9 respondent denies those allegations.

10 72. Answering paragraph 72, respondent admits that the cited statutes exist and
11 speak for themselves. To the extent said paragraph contains any allegations of material fact,
12 respondent denies those allegations.

13 73. Answering paragraph 73, respondent admits that the cited statute exists and
14 speaks for itself. To the extent said paragraph contains any allegations of material fact,
15 respondent denies those allegations.

16 74. Answering paragraph 74, respondent admits that the cited statute exists and
17 speaks for itself. To the extent said paragraph contains any allegations of material fact,
18 respondent denies those allegations.

19 **E. Certification Of The Vote By The Secretary**

20 75. Answering paragraph 75, respondent admits that the cited statutes exist and
21 speak for themselves. To the extent said paragraph contains any allegations of material fact,
22 respondent denies those allegations.

23 76. Answering paragraph 76, respondent admits that the cited statute exists and
24 speaks for itself. To the extent said paragraph contains any allegations of material fact,
25 respondent denies those allegations.

26 77. Answering paragraph 77, respondent admits that the cited statutes exist and
27 speak for themselves. To the extent said paragraph contains any allegations of material fact,
28 respondent denies those allegations.

1 78. Answering paragraph 78, respondent admits that the cited statute exists and
2 speaks for itself. To the extent said paragraph contains any allegations of material fact,
3 respondent denies those allegations.

4 79. Answering paragraph 79, respondent admits that the cited statute exists and
5 speaks for itself. To the extent said paragraph contains any allegations of material fact,
6 respondent denies those allegations.

7 80. Answering paragraph 80, respondent admits that the cited reference work exists
8 and speaks for itself. To the extent said paragraph contains any allegations of material fact,
9 respondent denies those allegations.

10 81. Answering paragraph 81, respondent denies each and every allegation
11 contained therein.

12 82. Answering paragraph 82, the allegations contained in the first sentence of said
13 paragraph constitute legal conclusions and opinions to which an answer is not required.
14 Respondent denies each and every remaining allegation in paragraph 82.

15 83. Answering paragraph 83, respondent admits that the cited statutes exist and
16 speak for themselves. To the extent said paragraph contains any allegations of material fact,
17 respondent denies those allegations.

18 84. Answering paragraph 84, the allegations contained in said paragraph constitute
19 a legal argument to which no answer is required. To the extent said paragraph contains any
20 allegations of material fact, respondent denies those allegations.

21 85. Answering paragraph 85, respondent admits petitioners requested, and that
22 respondent provided, certain data. Except as expressly admitted, respondent denies each and
23 every remaining allegation in the first two sentences of said paragraph. The remaining allegations
24 in said paragraph state only legal conclusions and opinions to which an answer is not required.
25 To the extent a response is required, respondent denies each and every such allegation.

26 86. Answering paragraph 86, respondent admits that the cited cases exist and
27 speaks for themselves. To the extent said paragraph contains any allegations of material fact,
28 respondent denies those allegations.

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PRAYER FOR RELIEF

Answering petitioners’ entire prayer for relief, including its paragraphs 1 through 7, respondent denies each and every allegation in said paragraphs. Respondent denies that petitioners are entitled to the relief sought, or any relief whatsoever.

AFFIRMATIVE DEFENSES

Respondent asserts the following affirmative defenses. In asserting these defenses, respondent does not assume the burden of establishing any fact or proposition where that burden is properly imposed on petitioners. Respondent also reserves the right to assert additional affirmative defenses that are revealed during the pendency of this action.

First Affirmative Defense

(Failure to State a Cause of Action)

As to her first affirmative defense, respondent alleges that the verified petition, and each purported cause of action contained therein, fails to state facts sufficient to state a cause of action against respondent or to justify the relief sought, or any relief whatsoever.

Second Affirmative Defense

(Mootness)

As to her second affirmative defense, respondent alleges that the verified petition should be denied because the relief sought is moot because this action cannot be heard before the deadline to certify the November 2024 General Election.

Third Affirmative Defense

(Standing)

As to her third affirmative defense, respondent alleges that at least one petitioner lacks standing to bring this action against respondent.

Fourth Affirmative Defense

(Laches)

As to her fourth affirmative defense, respondent alleges that the verified petition is barred by the doctrine of laches and unreasonable delay in bringing this action.

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Fifth Affirmative Defense

(Lack of Present Duty)

As to her fifth affirmative defense, respondent alleges that the verified petition should be dismissed because respondent has fulfilled her duties as provided by law.

Sixth Affirmative Defense

(Lack of Clear Duty)

As to her Sixth affirmative defense, respondent alleges that petitioners have not identified a specific legal duty on the part of respondent in which petitioners have a beneficial right in the performance of that duty.

Seventh Affirmative Defense

(Adequate Legal Remedy)

As to her seventh affirmative defense, respondent alleges that petitioners have an adequate legal remedy to challenge alleged errors in elections results.

Eighth Affirmative Defense

(Failure to Exhaust Administrative Remedies)

As to her eighth affirmative defense, respondent alleges that petitioners have failed to exhaust administrative remedies before filing this writ petition.

Dated: December 2, 2024

Respectfully submitted,

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Secretary of State, Dr. Shirley Weber, Ph.D.*

DECLARATION OF SERVICE BY E-MAIL and U.S. MAIL

Case Name: **Election Integrity Project California, Inc., et al. v. Shirley Weber, et al.**
No.: **24WM000168**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On December 2, 2024, I served the attached **RESPONDENT SECRETARY OF STATE'S ANSWER TO PETITIONERS' VERIFIED PETITION FOR PEREMPTORY WRIT OF MANDATE** by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

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and Charles Shinn*

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on December 2, 2024, at Sacramento, California.

Kyle Nicholson
Declarant

/s/ Kyle Nicholson
Signature