

1 Plaintiff/Petitioner Committee to Support the Recall of District Attorney George Gascón
2 (“**Committee**”), by and through its counsel of record, alleges as follows.

3 **INTRODUCTION**

4 1. This lawsuit seeks to rectify one of the most monumental election errors in modern
5 Los Angeles County history: the County Registrar’s unlawful rejection of tens of thousands of
6 voter signatures in support of the petition to recall District Attorney George Gascón (“**Recall**
7 **Petition**”), and his failure to certify to the Board of Supervisors that the Recall Petition had in fact
8 gathered sufficient signatures to trigger a recall election.

9 2. In August 2022, Defendants/Respondents Dean C. Logan and the Office of the Los
10 Angeles County Registrar-Recorder/County Clerk (collectively “**Registrar**”) announced that the
11 Recall Petition had fallen 46,807 signatures short of the 566,857 signatures purportedly needed to
12 qualify the petition for a recall election. This was wrong for three key reasons.

13 a. **Inflated Signature Requirement.** The Registrar relied on an inaccurate
14 signature threshold. A recall petition must be supported by the signatures of at least 10% of the
15 jurisdiction’s active registered voters to qualify for a recall election. The Registrar told the
16 Committee it needed to obtain 566,857 signatures to qualify the Recall Petition, purportedly
17 because the County had 5,668,569 active registered voters at the time. This number was wrong.
18 The Registrar has since admitted to the Committee, and others, in writing that Los Angeles County
19 had only 5,438,400 active registered voters at the time—230,169 fewer than what he originally
20 claimed. (See **Exhibit 6.**) Furthermore, the Committee has determined that even this calculation
21 included approximately 35,015 voters who should not have been identified as active voters in Los
22 Angeles County—such as voters who had moved out of the county, voters who had moved out of
23 state, duplicate registration files, and more. The number of active registered voters in Los Angeles
24 County as of January 4, 2022, should have been calculated to be no more than 5,403,385.
25 Accordingly, the Recall Petition required no more than 540,338 signatures to qualify for a recall
26 election.

27 b. **Incorrectly Rejected Signatures.** The Registrar incorrectly rejected at
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1 least 20,587¹ petition signatures that the law plainly required them to accept. Just a few examples
2 of the incorrect rejections include:

- 3 • Recall Petition signatures were rejected on the purported basis that the voter was
4 not registered to vote—even though the Registrar’s records plainly revealed that the
voter *was* registered to vote.
- 5 • Recall Petition signatures were rejected on the purported basis that the address on
6 the petition was different from the voter’s registered address—even though the
voter file showed the exact same registered address.
- 7 • Signatures were incorrectly invalidated as “duplicates” without the Registrar
8 counting at least one of the alleged duplicates.
- 9 • Recall Petition signatures were rejected because the voter’s voter file was
10 cancelled, even where the voter signed the Recall Petition prior to cancellation.
- 11 • Petition signatures were invalidated as “printed” even though the voter’s signature
12 on file was itself printed.

13 c. **Unlawfully Rejected Signatures.** The Registrar rejected at least 5,597
14 further signatures based on a failure to comply with signature review standards, and based on the
15 application of unconstitutional signature review standards. All such signatures were unlawfully
16 rejected because California’s failure to allow signature curing for petition signers—that is, giving
17 such signers an opportunity to cure any alleged deficiencies in their signatures—is an
18 unconstitutional burden on their right to vote. About 2,425 such signatures were also wrongly
19 rejected because the Registrar failed to conduct all required levels of review for signatures that
20 were invalidated for having a mismatched signature.

21 3. Thus, contrary to the Registrar’s certification, the Committee submitted 546,234
22 valid signatures in support of the Recall Petition. This exceeds the number of signatures that were
23 actually required to qualify the Recall Petition (540,338). The Registrar should thus have certified
24 the Recall Petition as sufficient, and the Board of Supervisors should have ordered a recall
25 election.

26 ¹ To date, the Committee has been able to review only about 110,000 of the 195,713
27 rejected Recall Petition signatures. This number may increase as the Committee continues
28 reviewing the Recall Petition.

1 7. Defendant and Respondent Office of the Los Angeles County Registrar-
2 Recorder/County Clerk is a department within the County of Los Angeles, and is the department
3 responsible for reviewing and certifying recall petitions in Los Angeles County under the
4 California Elections Code, the Los Angeles County Charter, and the California Constitution,
5 including the petition to recall Los Angeles County District Attorney George Gascón. On August
6 15, 2022, Respondent Los Angeles County Registrar-Recorder/County Clerk officially (and
7 erroneously) certified the Recall Petition as insufficient.

8 8. Real Party in Interest George Gascón is the current Los Angeles County District
9 Attorney. Gascón is the public official who is the subject of the Recall Petition. The Committee
10 has named Gascón as a real party in interest pursuant to an order of the Court. Furthermore, at all
11 relevant times, DOES 1 through 20 were and are individuals, business entities, public entities,
12 and/or public officials that were and are responsible for the conduct complained of herein. The
13 identities and particular capacities of DOES 1 through 20 are presently unknown to
14 Plaintiff/Petitioner. Plaintiff/Petitioner therefore sues these defendants by fictitious names.
15 Plaintiff/Petitioner is informed and believes, and therefore alleges, that DOES 1 through 20 were
16 responsible in some manner for the occurrences herein alleged, and that Plaintiff/Petitioner's
17 injuries as herein alleged were proximately caused by said defendants. Plaintiff/Petitioner will
18 substitute the true names and capacities of DOES 1 through 20 when ascertained.

19 **JURISDICTION, VENUE, PRECEDENCE, AND EXHAUSTION**

20 9. This Court has jurisdiction to issue the relief requested pursuant to Code of Civil
21 Procedure sections 526, 527, 1060, and 1085. Venue is proper in this Court in that all
22 Respondents are located within the County of Los Angeles, and the conduct underlying each cause
23 of action alleged herein arose within the County of Los Angeles. Petitioner has a clear, present,
24 and beneficial right to the performance of the Respondents' duty to adhere to and enforce the law,
25 and has no plain, speedy and adequate remedy at law.

26 10. This action is entitled to precedence under Code of Civil Procedure sections 35 and
27 36(e). Under section 35, "[p]roceedings in cases involving the registration or denial of registration
28 of voters, . . . the certification or denial of certification of ballot measures, [and] election contests

1 . . . shall be placed on the calendar in the order of their date of filing and shall be given
2 precedence.” A recall petition is considered a “measure.” (See Gov. Code, § 82043 [“‘Measure’
3 means any . . . proposition . . . which is submitted or is intended to be submitted to a popular vote
4 at an election by initiative, referendum *or recall procedure* whether or not it qualifies for the
5 ballot.”].) This action directly contests the Registrar’s denial of certification of the Recall Petition.
6 Separately and additionally, this matter also “involves” an “election contest[],” as the Committee
7 is petitioning for a writ of mandate to compel the Registrar to certify the Recall Petition as
8 sufficient, which by law would require the Los Angeles County Board of Supervisors to order a
9 recall election. For both reasons, this action qualifies for precedence under section 35.

10 11. Code of Civil Procedure section 36(e) provides that, “[n]otwithstanding any other
11 provision of law, the court may in its discretion grant a motion for preference that is supported by
12 a showing that satisfies the court that the interests of justice will be served by granting this
13 preference.” The next regularly-scheduled election in California for which a recall election could
14 realistically qualify is the March 5, 2024 primary election. Under Elections Code section
15 11242(a), the Los Angeles County Board of Supervisors must order the recall election no later
16 than 88 days before this date, which is December 8, 2023—approximately five months away. The
17 Board of Supervisors, in turn, has 14 days to issue such an order after the Registrar presents the
18 certificate of sufficiency to the Board at its regularly-scheduled meeting. (Elec. Code, §§ 11227,
19 11240.) The last regularly-scheduled meeting of the Board of Supervisors that is at least 14 days
20 before December 8, 2023, is the Tuesday, November 21, 2023 meeting. This action therefore
21 needs to be litigated and fully resolved before that date, including with sufficient time for this
22 Court to adjudicate any signature rejections that the Registrar does not concede were erroneously
23 rejected. It is thus in the interests of justice to grant this action calendar preference.

24 12. On August 19, 2022, the Registrar informed the Committee that “there is no
25 authority for this office to accept or adjudicate challenges [to incorrectly-rejected petition
26 signatures], nor is there any authority to reconsider, modify, or re-issue the certificate of results
27 after a finding of insufficiency.” (**Exhibit 7.**) As a result, there were no administrative remedies
28 available to the Committee to exhaust prior to filing this action.

1 **FACTUAL ALLEGATIONS**

2 **I. The Committee Submits 715,833 Signatures Supporting the Recall Petition**

3 13. George Gascón was elected as the Los Angeles County District Attorney in
4 November 2020, and took office on December 7, 2020. Since then, Gascón has introduced a slew
5 of controversial prosecutorial policies intended to substantially reduce charges brought against,
6 and prison sentences imposed on, criminal defendants. As violent crime rates in Los Angeles
7 County began to soar, many Los Angeles County residents grew frustrated with what they saw as
8 Gascón’s lack of concern for the victims of crime and the safety of the law-abiding public.

9 14. On January 27, 2022, the Committee received approval from the Registrar to
10 circulate a petition to recall Gascón. In the approval letter, the Registrar identified the number of
11 signatures that the proponents would need to secure:

12 Elections Code Sections 11220 and 11221 provide that the petitions . . . shall be
13 signed by not less than 10% of the registered voters in the electoral jurisdiction.
14 The number of registered voters shall be calculated as of the time of the last report
of registration to the Secretary of State, which was January 4, 2022. The number of
valid signatures required for the District Attorney will be 566,857.

15 **(Exhibit 1.)**

16 15. With the help of hundreds of volunteers, paid signature gatherers, and donor
17 contributions, the Committee collected an astounding 715,833 signatures in support of the recall
18 petition—148,976 more than the 566,857 signatures that the Registrar informed the Committee
19 was needed to trigger a recall election. On July 6, 2022, the Committee submitted the recall
20 petition to the Registrar to verify the signatures, certify the sufficiency of the petition, and order a
21 recall election. Personnel from the Registrar’s office remarked to Committee representatives that
22 this recall petition was the largest petition it had ever processed.

23 16. On July 9, 2022, the Registrar issued a press release verifying the total number of
24 raw signatures submitted. Attached as **Exhibit 2** is a true and correct copy of the press release.
25 The Registrar performed an initial review of a 5% sample of the signatures submitted pursuant to
26 Elections Code section 11225. The submitted signatures passed the 5% sample review, and the
27 Registrar proceeded to conduct a full review of all petition signatures. Emmanuel Anyiwo, a
28 Division Manager in the Registrar’s Voter Records Division, confirmed to a Committee

1 representative that he was supervising the signature verification of the recall petition. Mr. Anyiwo
2 further shared that, given the sheer volume of signatures submitted, the Registrar had to employ
3 “close to 400” workers to conduct the processing and signature verification of the recall petition,
4 comprised of permanent, recurrent, and temporary staff hired through staffing agencies.

5 **II. The Registrar Wrongly Rejects the Recall Petition**

6 17. On August 15, 2022, the Registrar announced that it had found an astounding
7 195,783 petition signatures invalid, and 520,050 signatures valid. This resulted in 46,807 fewer
8 signatures than the Registrar stated was needed to qualify the petition for a recall election.
9 Attached as **Exhibit 3** is a true and correct copy of the Registrar’s press release making that
10 announcement. The Registrar therefore certified the petition as insufficient. Attached as
11 **Exhibit 4** is a true and correct copy of the Registrar’s certificate of insufficiency. Each signature
12 was rejected for one of sixteen potential reasons, as follows:

- 13 • Not Registered: 88,464
- 14 • Duplicate Signature: 43,593
- 15 • Different Address: 32,187
- 16 • Mismatch Signature: 9,490
- 17 • Cancelled: 7,344
- 18 • Out-of-County Address: 5,374
- 19 • Other: 9,331

20 18. “Other” includes ten further reasons for rejection, such as where the voter’s
21 information appeared to have been entered by the circulator (instead of the signer); the voter’s file
22 is marked as deficient and is pending inactivation or cancellation; the address identified was the
23 voter’s mailing address and not his or her residence address; the voter was a minor at the time of
24 signing; signatures appeared to be printed rather than signed; signatures on the petition were
25 missing; and others. Attached as **Exhibit 5** is a true and correct copy of the breakdown of all
26 rejection categories provided by the Registrar’s office.

27 **III. The Committee Discovers Tens of Thousands of Incorrectly Rejected Signatures**

28 19. The Committee was shocked by the number of rejected signatures. On August 18,

1 2022, determined to uncover how and why so many signatures were rejected, the Committee
2 informed the Registrar that it intended to exercise its statutory right, under Elections Code section
3 11301 and Government Code section 7924.110, to examine the petition to assess “which
4 signatures were disqualified and the reasons therefor.” In response, the Registrar promised the
5 Committee that the review process would include access to “the voter record data or information
6 that led to the disqualification of [each] signature”; the Registrar would “review and respond to”
7 “any questions in connection with the examination of the Petition to determine which signatures
8 were disqualified and the reasons therefor”; and the Registrar would permit the review to take
9 place at its offices “during normal business hours.”

10 20. Four weeks into the review process, the Registrar broke each one of those
11 promises. First, the Registrar refused to provide the Committee with sufficient access to the
12 records its needed to adequately evaluate each signature’s rejection, or otherwise provided the
13 Committee with records only in a form that made it incredibly arduous to conduct the signature
14 review. Second, the Registrar unreasonably limited the manner in which the review could be
15 conducted. Under the conditions the Registrar imposed, it would have taken the Committee over
16 *eighteen months* to complete its review—far beyond any conception of a reasonable review period.
17 The Committee was forced to come to court and obtain an injunction providing the access that it
18 demanded. (See *Committee to Support the Recall of District Attorney George Gascon v. Dean C.*
19 *Logan, et al.*, Los Angeles Superior Court Case No. 22STCP03795.) The Registrar has since
20 sought to delay compliance with the trial court’s injunction by taking an appeal and opposing
21 (unsuccessfully) expedited consideration of the appeal. (See *Committee to Support the Recall of*
22 *District Attorney George Gascon v. Dean C. Logan, et al.*, Second District Court of Appeal Case
23 No. B326869.) As of the filing of this complaint, that appeal remains pending, and several
24 documents ordered disclosed that are crucial to the Committee’s examination continue to be
25 withheld.

26 21. Nonetheless, the Recall Petition signatures that the Committee has been able to
27 review so far have revealed scores of incorrect signature rejections and a substantial lack of
28 compliance with signature review guidelines. Many signature rejections were flat-out wrong, such

1 as rejecting signatures as belonging to unregistered voters even though the voter was, in fact,
2 registered. Other signature rejections appeared to be based on a reviewer’s misunderstanding of
3 the information in the voter file, or a completely unreasonable interpretation of the signature
4 review guidelines. Just some examples of the reasons for the incorrectly-rejected signatures are as
5 follows:

- 6 • Recall Petition signatures were rejected on the purported basis that the voter was
7 not registered to vote—even though a review of the Registrar’s records plainly
8 revealed that the voter *was* registered to vote. Many even had the letters “VS” (for
9 valid signature) *and* the voter’s voter identification number hand-written on the
10 Recall Petition, yet were still marked in the Registrar’s petition module database as
11 rejected. When the Committee asked for an official list of valid Recall Petition
12 signatures to evaluate this discrepancy, the Registrar initially claimed it was
13 physically unable to create such a list. When it later conceded that it could do so,
14 the Registrar refused to provide it to the Committee.
- 15 • Recall Petition signatures were rejected on the purported basis that the address on
16 the petition was different from the voter’s registered address—even though the
17 voter file showed the exact same registered address.
- 18 • Signatures were incorrectly invalidated as “duplicates” without the Registrar
19 counting at least one of the alleged duplicates. The Registrar has since admitted in
20 court filings that it incorrectly rejected such Recall Petition signatures for this
21 reason.
- 22 • Recall Petition signatures were rejected because the voter’s registration was
23 cancelled, even where the voter signed the Recall Petition prior to the cancellation.
- 24 • Recall Petition signatures were rejected because the voter file was cancelled, when
25 in fact there were two voter files for the voter, one active and one cancelled, yet the
26 Registrar chose to use the cancelled voter file rather than the active voter file.
- 27 • Recall Petition signatures were rejected on the basis that the voter was not
28 registered to vote at the time he or she signed the petition, even though some voters
had been registered and eligible to vote for *decades*. It appears that the Registrar
had erroneously changed the original registration date.
- Petition signatures were incorrectly invalidated as “printed” even though the
voter’s signature on file was itself printed. There is no legal basis for rejecting
signatures as “printed,” and the relevant regulations specifically contemplate that
signatures may be printed rather than cursive. (Cal. Code Regs., tit. 2, § 20960,
subd. (f)(2).)

22. To date, the Committee has been able to review only about 110,000 of the 195,000
rejected signatures. Based on its review so far, the number of incorrectly rejected signatures for

1 each category is approximately as follows—with even more incorrect rejections likely to be found
 2 as the Committee’s review continues:

| REASON | # OF INCORRECTLY REJECTED SIGS |
|--|---------------------------------------|
| Not Registered <i>The voter was not registered to vote during the circulation period.</i> | 1,866 |
| Duplicate Signature <i>The voter signed the Recall Petition more than once.</i> | 3,386 |
| Different Address <i>The voter’s address on the Recall Petition did not match the voter’s registered address.</i> | 5,887 |
| Mismatched Signature <i>The voter’s signature on the Recall Petition did not match any sample of the voter’s signature in the voter’s registration record.</i> | 5,153 |
| Cancelled <i>The voter’s registration record was cancelled prior to the voter signing the petition.</i> | 1,113 |
| Out-of-County Address <i>The voter was registered to vote outside the County of Los Angeles.</i> | 121 |
| Info Entered by Circulator <i>The voter’s signature or information was entered by the circulator instead of the voter.</i> | 712 |
| Fatal Pending <i>The voter’s registration record is invalid for any one of several reasons.</i> | 300 |
| PO Box/Mailing Address <i>The voter included their PO Box or mailing address on the Recall Petition instead of their registered home address.</i> | 88 |
| Miscellaneous <i>The Recall Petition signature was rejected for other reasons not listed herein.</i> | 91 |

| | | |
|---|--|---------------|
| 1 | Missing / Printed Signature | |
| 2 | <i>The voter did not sign the petition, or printed his or her signature on the</i> | 931 |
| 3 | <i>petition.</i> | |
| 4 | No Address | |
| 5 | <i>The voter did not include his or her address on the Recall Petition.</i> | 119 |
| 6 | Invalid Registration Date | |
| 7 | <i>The voter was not registered as of the signing of the Recall Petition.</i> | 820 |
| 8 | TOTAL | 20,587 |

10 23. Furthermore, no fewer than 5,597 additional signatures were wrongly rejected on
11 the basis of a failure to comply with signature review standards, or based on the application of
12 unconstitutional signature review standards, including:

13 a. For all Recall Petition signatures rejected on the basis of the absence or
14 invalidity of the signature, neither the Elections Code nor the California Code of Regulations
15 provide any opportunity for signature curing—that is, informing the voter that their signature is
16 either missing or inaccurate, and giving them an opportunity to submit a valid signature. This is in
17 direct contrast with, for example, vote-by-mail statutes, which specifically require elections
18 officials to give such voters this opportunity. (Elec. Code, § 3019, subd. (d), (e).) There is no
19 basis whatsoever for providing that opportunity in connection with vote-by-mail ballots but not
20 petition signatures, and failing to provide that opportunity materially and substantially burdens the
21 right to vote in violation of the Due Process and Equal Protection clauses of the California
22 Constitution and the U.S. Constitution. Indeed, the California Legislature currently has pending
23 before it proposed legislation that would give petition signers the right to cure any deficiencies in
24 their signature. (See Assembly Bill No. 1004, California Legislative Information, at
25 <https://tinyurl.com/7r6dc5tk>.) This is necessary to adequately protect the constitutionally-
26 guaranteed direct democracy rights that all California citizens possess. For this reason, all Recall
27 Petition signatures rejected on the basis of a deficiency with the signature itself—a total of
28

1 11,681—should thus be counted.

2 b. Upon information and belief, the Registrar failed to conduct all required
3 levels of review for signatures that were invalidated for having a mismatched signature. A petition
4 signature rejected as materially different from the signature in the voter’s registration file must be
5 confirmed by the original examiner and two reviewers. (Cal. Code Regs., tit. 2, § 20960, subd.
6 (j).) Based on the Committee’s review of the Recall Petition, at least 2,425 such rejected
7 signatures were not subject to all three levels of review. Because a petition signature must be
8 counted *unless* the signature mismatch is confirmed at all three levels of review (*ibid.*), these
9 signatures must be counted.

10 c. The Registrar failed to apply the correct signature review standard to
11 reviewing petition signatures. A signature on a recall petition is presumed to be the signature of
12 the voter, and three petition examiners must conclude beyond a reasonable doubt that the signature
13 on the recall petition possessed “multiple, significant, and obvious distinctive differing
14 characteristics” from all signatures in the voter’s registration record in order to reject the signature.
15 (Cal. Code Regs., tit. 2, §20960, subd. (i), (j).) Upon information and belief, the Registrar’s
16 petition examiners did not apply this standard when examining the Recall Petition and thus did not
17 make that determination as to each Recall Petition signature that it rejected on the basis of (1)
18 signatures rejected as mismatched to the signature in the voter’s file (SIG); (2) signatures rejected
19 on the basis that they were printed (MS2); and (3) signatures that were rejected because there was
20 no signature on the petition (MSPET).

21 **IV. The Recall Petition Required Substantially Fewer Signatures to Qualify Than the**
22 **Registrar Reported to the Committee**

23 24. Los Angeles County voter rolls are notoriously inflated. Indeed, in 2017, Judicial
24 Watch sued the Registrar for violating the National Voter Registration Act. *Judicial Watch v.*
25 *Logan*, 2:17-cv-08948 (C.D. Cal. 2017). The lawsuit settled in 2019, and as part of the settlement,
26 the Registrar agreed to take action to clean up the county’s bloated voter rolls. Despite this, the
27 problem continued to persist. According to the U.S. Election Assistance Commission, in 2020
28 Los Angeles County had a voter registration rate of **112.7 percent** of its citizen voting age

1 population—meaning that Los Angeles County voter rolls had tens of thousands more registered
2 voters than there were persons eligible to voter. (See [https://www.eac.gov/research-and-
3 data/studies-and-reports](https://www.eac.gov/research-and-
3 data/studies-and-reports).)

4 25. In a case like this—where the sufficiency of a citizen petition turns on the
5 elections officials’ count of properly registered voters—the Registrar’s failure to maintain its voter
6 rolls and to update the Secretary of State’s voter roll database has effectively deprived Los
7 Angeles County citizens of their direct democracy rights.

8 26. Elections Code section 11221 specifies the number of petition signatures required
9 to qualify a recall election for a county officer. In a county such as Los Angeles, where the
10 number of registered voters exceeds 100,000, recall petitions require the support of 10% of the
11 county’s active registered voters. (Elec. Code, § 11221, subd. (a)(5); see also *id.* § 2226, subd.
12 (a)(2) [“Voters with an inactive voter registration status . . . are not included in calculations to
13 determine the number of signatures required for qualification of candidates and measures, precinct
14 size, or other election administration-related processes.”].) The statute also specifies the relevant
15 point in time for calculating the number of active registered voters for the purpose of qualifying a
16 recall petition:

17 For purposes of this section, the number of registered voters shall be calculated as
18 of the time of the last report of registration by the county elections official to the
19 Secretary of State pursuant to Section 2187, and prior to the finding by the
elections official or Secretary of State that no alterations are required in the form of
the recall petition pursuant to Section 11042.

20 (Elec. Code, § 11221, subd. (b).)

21 27. Here, on January 19, 2022, the Committee submitted to the Registrar the proposed
22 format of the Recall Petition that the Committee intended to circulate to voters. On January 27,
23 2022, the Registrar approved the form and wording of the proposed Recall Petition. It also
24 notified the Committee that, under Elections Code section 11221, the Recall Petition needed to be
25 signed by not less than 10% of the registered voters in the electoral jurisdiction, and that “[t]he
26 number of registered voters shall be calculated as of the time of the last report of registration to the
27 Secretary of State, which was January 4, 2022.” The Registrar attached the Secretary of State’s
28 report of registration for Los Angeles County as of that date, purportedly showing 5,668,569

1 active registered voters. Thus, the Registrar informed the Committee that “[t]he number of valid
2 signatures required for the [Recall Petition] will be 566,857.” Attached as **Exhibit 1** is a true and
3 correct copy of this letter.

4 28. But there was a massive problem with the Registrar’s stated number: the number of
5 active registered voters that Los Angeles County certified to the Secretary of State did not even
6 *come close* to the actual number of properly calculated active registered voters as of January 4,
7 2022. To the contrary, the number of properly calculated active registered voters in Los Angeles
8 County as of that date was several hundred thousand fewer than what the Registrar claimed.

9 29. On October 24, 2022, in response to a Public Records Act request, the Registrar
10 confirmed that as of December 31, 2021—four days before the Registrar certified its voter
11 registration numbers to the Secretary of State—Los Angeles County had a mere 5,438,400 active
12 registered voters, or 230,169 fewer than it reported to the Secretary of State. Attached as **Exhibit**
13 **6** is a true and correct copy of this letter.

14 30. Furthermore, the 5,438,400 active registered voters that the Registrar claimed to
15 exist was in fact further inflated by several tens of thousands of voters. In September 2022, the
16 Committee received from the Registrar a spreadsheet of all persons it considered active registered
17 voters. After eliminating all new voter registrations during calendar year 2022 from the
18 spreadsheet, and running the remaining voters through various public or semi-public databases and
19 information sources (such as the National Change of Address database), it was determined that
20 approximately 35,015 persons identified as active registered voters should not have been so
21 identified for various reasons—such as the voter had moved out of county or out of state, the same
22 voter had multiple duplicate registration records, and other reasons. The table below more fully
23 describes each such categories and how many registrants fell within each category.

24

| IRREGULARITY | NUMBER OF VOTERS |
|--------------|---------------------|
|--------------|---------------------|

25
26
27
28

| | | |
|----|--|--------|
| 1 | Moved Out of County | |
| 2 | <i>The federal National Change of Address database (NCOA) indicates</i> | 4,683 |
| 3 | <i>that the voter moved to another county. (See Elec. Code, § 2226(a)(1)</i> | |
| 4 | <i>[new address must be updated in voter database].)</i> | |
| 5 | Moved Out of State | |
| 6 | <i>The NCOA indicates that the voter moved to another state. (See Elec.</i> | 17,630 |
| 7 | <i>Code, §§ 2222, 2225 [a voter who has moved out of state must be</i> | |
| 8 | <i>moved immediately to the inactive voter list]; § 2201(a)(7).)</i> | |
| 9 | Duplicate Registration | |
| 10 | <i>The same voter has two or more voter registration records that the</i> | 3,111 |
| 11 | <i>Registrar separately counted. (See Elec. Code, § 2193 [duplicate voter</i> | |
| 12 | <i>registrations “shall be merged and the voter registration bearing the</i> | |
| 13 | <i>most recent date shall be the active record for that voter”].)</i> | |
| 14 | Invalid Registration Address | |
| 15 | <i>The voter is registered to vote at an address that is not their residence</i> | 455 |
| 16 | <i>address (e.g., at a UPS, a U.S. Post Office, a non-existent address, etc.).</i> | |
| 17 | <i>(See Elec. Code, § 2150(a)(3) [voter must be registered with their</i> | |
| 18 | <i>current residence address].)</i> | |
| 19 | Lack of Registration Birth Date | |
| 20 | <i>The registration record does not include a birthdate. (See Elec. Code,</i> | 931 |
| 21 | <i>§ 2150(a)(5) [affidavit of registration must include birthdate], § 2153.)</i> | |
| 22 | Deceased Voter | |
| 23 | <i>Death records indicate voter is deceased, or voter registration record</i> | 8,205 |
| 24 | <i>indicates they are over 100 years old and thus likely deceased. (See</i> | |
| 25 | <i>Elec. Code, § 2201(a)(5) [voter registration must be cancelled upon</i> | |
| 26 | <i>death].)</i> | |
| 27 | TOTAL | 35,015 |
| 28 | | |

31. In addition, upon information and belief, the Registrar failed to mark certain voters as inactive based on events that required that it do so. This includes, but is not limited to: (1) the Registrar failed to timely mark as inactive voters for whom it received undelivered/undeliverable voter notification cards for several years prior to January 4, 2022; and (2) the Registrar failed to timely mark as inactive voters for whom it received undelivered/undeliverable voter-by-mail ballots during and after the election to recall Governor Gavin Newsom.

32. Based on the foregoing, the Registrar should have calculated the number of active

1 registered voters as of January 4, 2022, to be no more than 5,403,385.² As a result, the Recall
2 Petition should have qualified for a recall election as long as it was supported by 540,338
3 signatures—which was 26,518 fewer than what the Registrar claimed was required. As alleged
4 above, the number of valid signatures exceeded that number—and thus the Registrar should have
5 certified the Recall Petition as sufficient.

6 **FIRST CAUSE OF ACTION**

7 **(Writ of Mandate)**

8 33. The Committee incorporates by reference the preceding paragraphs as if fully set
9 forth herein.

10 34. The Committee is entitled to a writ of mandate under Code of Civil Procedure
11 section 1085, which provides that a writ of mandate is available to compel public agencies to
12 perform acts required by law, for failure to perform a mandatory duty, or for review of quasi-
13 legislative action by a local agency. A writ of mandate “may be issued by any court to any
14 inferior tribunal, corporation, board, or person, to compel the performance of an act which the law
15 specially enjoins, as a duty resulting from an office, trust, or station, or to compel the admission of
16 a party to the use and enjoyment of a right or office to which the party is entitled, and from which
17 the party is unlawfully precluded by that inferior tribunal, corporation, board, or person.” (Code
18 Civ. Proc., § 1085, subd. (a).)

19 35. As alleged herein, the Registrar violated the following mandatory duties and/or
20 acted in a manner that is arbitrary, capricious, or unreasonable:

21 a. Elections Code section 11224(a) provides that, “[i]f the elections official’s
22 examination [of a recall petition] shows that the number of valid signatures is greater than the
23 required number, the elections official shall certify the petition to be sufficient.” As alleged
24 herein, the number of valid signatures submitted in support of the Recall Petition was greater than
25

26 ² To the extent discovery in this action demonstrates that the Registrar’s active voter
27 registration calculations were more inflated than the amounts alleged herein, the Committee
28 reserves its right to amend its calculations prior to trial.

1 “the required number” because: (1) no fewer than 546,234 valid signatures were submitted in
2 support of the Recall Petition; and (2) no greater than 540,338 valid signatures were required by
3 law to be submitted to qualify for a recall election. Thus, the Registrar had no discretion but to
4 “certify the petition to be sufficient.” The Registrar violated this provision by certifying the Recall
5 Petition to be insufficient despite the number of valid signatures being greater than “the required
6 number.”

7 b. Elections Code section 11227 provides that, “[i]f the elections official finds
8 the signatures on the petition to be sufficient, he or she shall submit his or her certificate as to the
9 sufficiency of the petition to the governing body at its next regular meeting.”³ Because the
10 number of valid signatures submitted in support of the Recall Petition was greater than “the
11 required number” of valid signatures under Elections Code section 11224(a), the Registrar had no
12 discretion but to certify the petition to be sufficient. In turn, the Registrar had no discretion but to
13 submit a certificate of sufficiency for the Recall Petition to the Los Angeles County Board of
14 Supervisors. As alleged herein, the Registrar violated this provision by instead submitting a
15 certificate of insufficiency for the Recall Petition to the Los Angeles County Board of Supervisors.

16 c. Elections Code section 11221 specifies the method for calculating the
17 required number of signatures to qualify a recall petition for the ballot. For a county such as Los
18 Angeles, which has in excess of 100,000 voter registration, a proponent must submit the signatures
19 of no fewer than 10% of the registered voters in the jurisdiction. The number of registered voters
20 is determined “as of the time of the last report of registration by the county elections official to the
21 Secretary of State pursuant to Section 2187, and prior to the finding by the elections official or
22 Secretary of State that no alterations are required in the form of the recall petition pursuant
23 to Section 11042” (Elec. Code, § 11221(b)), and must include only active voters (Elec. Code,
24 § 2226(b)(2)). With respect to the Recall Petition, the relevant Report of Registration was issued
25

26 _____
27 ³ Further, within fourteen days after that submission, the governing body “shall issue an
28 order stating that an election shall be held . . . to determine whether or not the officer named in the
petition shall be recalled.” (Elec. Code, § 11240.)

1 on January 4, 2022, which identified the number of active registered voters in Los Angeles County
2 to be 5,668,569. However, the January 4, 2022 Report of Registration did not accurately identify
3 the number of active registered voters in Los Angeles County as of January 4, 2022. Upon
4 information and belief, the number of active registered voters in Los Angeles County as of January
5 4, 2022 was no greater than 5,403,385.

6 d. Upon information and belief, the January 4, 2022 Report of Registration
7 reported an inflated number of active voter registrations in Los Angeles County because either (i)
8 the Registrar failed to comply with its mandatory duty to notify the Secretary of State of voters
9 whom its records had marked as inactive, cancelled, or otherwise nonactive voters; or (ii) the
10 Registrar failed to comply with its mandatory duty to mark as inactive, cancelled, or nonactive
11 voters whom it was required by law to mark them as such.

12 e. Under Elections Code section 2187(c), the Registrar “shall prepare the
13 information referenced in subdivision (a) and provide notice to the Secretary of State [that such
14 information is available].” The “information referenced in subdivision (a)” includes “the total
15 number of voters in the county.” (Elec. Code, § 2187(a)(1).) For the purposes of Section
16 2187(a)(1), this includes identifying the number of active registrations. (See Elec. Code,
17 § 2226(b)(1).) The Registrar “prepare[s]” this information by “[c]onduct[ing] a synchronization
18 check pursuant to Section 19083” and “[r]esolv[ing] any synchronization issues resulting in
19 incorrect voter counts” (Cal. Code Regs., tit. 2, § 19086(a)(1), (a)(3)), after which the Registrar
20 must “certify the information provided to the Secretary of State” (*id.* § 19086(b)).

21 f. Under California Code of Regulations, Title 2, Section 19083, the Registrar
22 “shall” conduct “regular synchronization checks to compare the voter registration data in the
23 statewide voter registration system with the voter registration data in the county EMS and resolve
24 any differences.” (*Id.* § 19083(a).) This includes completing a synchronization check and
25 resolving any differences “at least monthly” (*id.* § 19083(b)), as well as “no more than 30 days
26 prior to . . . [a] Report of Registration (ROR)” (*id.* § 19083(c)). “When differences are identified
27 in a synchronization check,” the Registrar “shall prioritize the correction of data differences” as
28 follows: “(1) Voters in the county EMS and not in the statewide voter registration system;

1 (2) Voters in the statewide voter registration system and not in the county EMS; (3) Data
2 differences between the statewide voter registration system and the county EMS.” (*Id.*
3 § 19083(d).) The synchronization of voter data by the Registrar “shall be within acceptance
4 tolerance criteria based on the number of differences between the county EMS and the statewide
5 voter registration system.” (*Id.* § 19083(f).) For a county such as Los Angeles, which has more
6 than 3 million registered voters, only “8,000 differences [between the registration records are]
7 allowed.” (*Id.* § 19083(f)(2)(F), (f)(2)(G).)

8 g. The Registrar violated its mandatory duty to synchronize county EMS
9 records with the statewide voter registration system to within 8,000 differences. Upon information
10 and belief, the Registrar’s EMS system contained fewer active registrations than the statewide
11 voter registration system. Had the Registrar resolved these differences between the county EMS
12 system and the statewide voter registration system, the Secretary of State would have reported
13 fewer active registrations in Los Angeles County in its January 4, 2022 Report of Registration.

14 h. In addition or in the alternative, the Registrar violated its mandatory duty to
15 mark active Los Angeles County voters as either inactive, cancelled, or otherwise nonactive
16 despite receiving information demonstrating that they legally must be so marked. This includes,
17 but is not limited to, the following:

18 (i) Elections Code § 2222(a)(1): when an elections official receives
19 information “indicat[ing] the voter has moved to a new residence address in California, the county
20 elections official shall immediately update the voter’s registration record.” Upon information and
21 belief, the Registrar received notification that voters previously registered to vote in Los Angeles
22 County had moved out of the county on or before January 4, 2022, but were nonetheless still
23 identified as active registered voters in Los Angeles County.

24 (ii) Elections Code § 2225(a)(2), (c), (f): when an elections official
25 receives information “indicat[ing] that a voter has moved out of state,” the elections official must
26 send the voter a notice and “shall update the status of the voter’s registration to inactive.” Upon
27 information and belief, the Registrar received information indicating that voters previously
28 registered to vote in Los Angeles County had moved out of California on or before January 4,

1 2022, but were nonetheless still identified as active registered voters in Los Angeles County.

2 (iii) Elections Code § 2193: where the Secretary of State receives
3 information from a county elections official during the synchronization process that there are
4 duplicate voter registrations, those registrations shall be merged into one file. Upon information
5 and belief, there are duplicate voter registrations that were separately counted in the January 4,
6 2022 Report of Registration.

7 (iv) Elections Code § 2150(a)(3), Cal. Code Regs., tit. 2, § 19062,
8 19072: an affidavit of registration must contain the voter’s place of residence and their date of
9 birth. (Elec. Code, § 2150(a)(3), (a)(5).) A voter registration record that does not contain such
10 information is considered a “deficient registration record” and is treated the same as an incomplete
11 affidavit of registration. (Cal. Code Regs., tit. 2, § 19062(h).) An incomplete affidavit of
12 registration, in turn, is “held in a separate location in the county EMS from the list of current
13 voters” and is “entered into the [county] EMS” only “[o]nce all required registration information is
14 received.” Likewise, a deficient registration record shall result in a deficiency notice to the
15 Registrar, who must reject the registration within 180 days. (*Id.* § 19072(c).) Upon information
16 and belief, the January 4, 2022 Report of Registration contained Los Angeles County voters
17 whose registrations did not include a place of residence or a date of birth, and thus should not have
18 been counted as active registered voters.

19 (v) Elections Code § 2201(a)(5): the Registrar must cancel a voter
20 registration “[u]pon the death of the person registered.” Upon information and belief, the January
21 4, 2022 Report of Registration contained Los Angeles County persons who were deceased as of
22 the time of the Report of Registration, and thus should not have been counted as active registered
23 voters.

24 (vi) Cal. Code Regs., tit. 2, § 19081(a), (b): “If mailings [to a registered
25 voter] have been returned as undeliverable, or if NCOA, Operation Mail, a returned mailing, or
26 postal service change-of-address data indicates that a voter has moved and left no forwarding
27 address or moved out of state,” the Registrar is required to send the voter a forwardable address
28 confirmation mailing to the voter and “shall update the voter’s record to inactive status.” Upon

1 information and belief, the Registrar may have failed to mark certain voters as inactive as follow:

2 (1) the Registrar failed to timely mark as inactive voters for whom it received
3 undelivered/undeliverable voter notification cards for several years prior to January 4, 2022; and
4 (2) the Registrar failed to timely mark as inactive voters for whom it received
5 undelivered/undeliverable voter-by-mail ballots during and after the election to recall Governor
6 Gavin Newsom. Upon information and belief, those voters were erroneously identified as active
7 registered voters in the January 4, 2022 Report of Registration.

8 (vii) Upon information and belief, the Registrar has otherwise failed to
9 comply with its mandatory duty to mark voters as inactive, cancelled, or otherwise nonactive
10 despite being required by law to do so.

11 i. By failing to comply with its mandatory duty to mark the foregoing voters
12 as inactive or cancelled, the Registrar erroneously informed the Secretary of State that at least
13 265,184 such voters were and should be active registered voters in Los Angeles County when in
14 fact they were not or should not have been so identified. As a result, the Secretary of State
15 erroneously included at least 265,184 more persons in the January 4, 2022 Report of Registration,
16 and thus the Registrar erroneously calculated the number of signatures required to qualify the
17 Recall Petition to be at least 26,518 more persons than should have been required under Elections
18 Code section 11221.

19 36. The Court should thus issue a writ of mandate compelling the Registrar to: (1)
20 count as valid any and all incorrectly-rejected Recall Petition signatures identified herein; (2) re-
21 issue a certificate that accurately identifies the number of valid Recall Petition signatures; and (3)
22 certify to the Los Angeles County Board of Supervisors that the Recall Petition is sufficient.

23 37. The Committee has a clear, present, and direct beneficial interest in, and right to,
24 the Registrar's performance of its legal duty to adhere to and enforce the law. At all times
25 relevant to this action, the Registrar has had the ability to perform the duties set forth herein, and
26 has failed and refused to do so.

27 38. Unless compelled by this Court to perform those acts and duties and to refrain from
28 acts as required by law, the Registrar will continue to refuse to perform said duties and continue to

1 violate the law, and the Committee will be injured as a result. The Committee has no plain,
2 speedy, and adequate alternative remedy.

3 **SECOND CAUSE OF ACTION**

4 **(Declaratory Relief)**

5 39. The Committee incorporates by reference the preceding paragraphs as if fully set
6 forth herein.

7 40. Code of Civil Procedure section 1060 authorizes a court to render a declaratory
8 judgment in cases of actual controversy relating to the legal rights and duties of the respective
9 parties, including to decide the correct interpretation of disputed statutes. Furthermore, a court
10 that may render a judicial declaration on a matter has the authority to order the coercive relief
11 necessary to effectuate that declaration. (See, e.g., *Hollenbeck Lodge (486) I.O.O.F. v. Wilshire*
12 *Boulevard Temple* (1959) 175 Cal.App.2d 469, 476.)

13 41. As alleged herein, the Registrar violated the following mandatory duties and/or
14 acted in a manner that is arbitrary, capricious, or unreasonable:

15 a. Elections Code section 11224(a) provides that, “[i]f the elections official’s
16 examination [of a recall petition] shows that the number of valid signatures is greater than the
17 required number, the elections official shall certify the petition to be sufficient.” As alleged
18 herein, the number of valid signatures submitted in support of the Recall Petition was greater than
19 “the required number” because: (1) no fewer than 546,234 valid signatures were submitted in
20 support of the Recall Petition; and (2) no greater than 540,338 valid signatures were required by
21 law to be submitted to qualify for a recall election. Thus, the Registrar had no discretion but to
22 “certify the petition to be sufficient.” The Registrar violated this provision by certifying the Recall
23 Petition to be insufficient despite the number of valid signatures being greater than “the required
24 number.”

25 b. Elections Code section 11227 provides that, “[i]f the elections official finds
26 the signatures on the petition to be sufficient, he or she shall submit his or her certificate as to the
27
28

1 sufficiency of the petition to the governing body at its next regular meeting.”⁴ Because the
2 number of valid signatures submitted in support of the Recall Petition was greater than “the
3 required number” of valid signatures under Elections Code section 11224(a), the Registrar had no
4 discretion but to certify the petition to be sufficient. In turn, the Registrar had no discretion but to
5 submit a certificate of sufficiency for the Recall Petition to the Los Angeles County Board of
6 Supervisors. As alleged herein, the Registrar violated this provision by instead submitting a
7 certificate of insufficiency for the Recall Petition to the Los Angeles County Board of Supervisors.

8 c. Elections Code section 11221 specifies the method for calculating the
9 required number of signatures to qualify a recall petition for the ballot. For a county such as Los
10 Angeles, which has in excess of 100,000 voter registration, a proponent must submit the signatures
11 of no fewer than 10% of the registered voters in the jurisdiction. The number of registered voters
12 is determined “as of the time of the last report of registration by the county elections official to the
13 Secretary of State pursuant to Section 2187, and prior to the finding by the elections official or
14 Secretary of State that no alterations are required in the form of the recall petition pursuant
15 to Section 11042” (Elec. Code, § 11221(b)), and must include only active voters (Elec. Code,
16 § 2226(b)(2)). With respect to the Recall Petition, the relevant Report of Registration was issued
17 on January 4, 2022, which identified the number of active registered voters in Los Angeles County
18 to be 5,668,569. However, the January 4, 2022 Report of Registration did not accurately identify
19 the number of active registered voters in Los Angeles County as of January 4, 2022. Upon
20 information and belief, the number of active registered voters in Los Angeles County as of January
21 4, 2022 was no greater than 5,403,385.

22 d. Upon information and belief, the January 4, 2022 Report of Registration
23 reported an inflated number of active voter registrations in Los Angeles County because either (i)
24 the Registrar failed to comply with its mandatory duty to notify the Secretary of State of voters
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26 _____
27 ⁴ Further, within fourteen days after that submission, the governing body “shall issue an
28 order stating that an election shall be held . . . to determine whether or not the officer named in the
petition shall be recalled.” (Elec. Code, § 11240.)

1 whom its records had marked as inactive, cancelled, or otherwise nonactive voters; or (ii) the
2 Registrar failed to comply with its mandatory duty to mark as inactive, cancelled, or nonactive
3 voters whom it was required by law to mark them as such.

4 e. Under Elections Code section 2187(c), the Registrar “shall prepare the
5 information referenced in subdivision (a) and provide notice to the Secretary of State [that such
6 information is available].” The “information referenced in subdivision (a)” includes “the total
7 number of voters in the county.” (Elec. Code, § 2187(a)(1).) For the purposes of Section
8 2187(a)(1), this includes identifying the number of active registrations. (See Elec. Code,
9 § 2226(b)(1).) The Registrar “prepare[s]” this information by “[c]onduct[ing] a synchronization
10 check pursuant to Section 19083” and “[r]esolv[ing] any synchronization issues resulting in
11 incorrect voter counts” (Cal. Code Regs., tit. 2, § 19086(a)(1), (a)(3)), after which the Registrar
12 must “certify the information provided to the Secretary of State” (*id.* § 19086(b)).

13 f. Under California Code of Regulations, Title 2, Section 19083, the Registrar
14 “shall” conduct “regular synchronization checks to compare the voter registration data in the
15 statewide voter registration system with the voter registration data in the county EMS and resolve
16 any differences.” (*Id.* § 19083(a).) This includes completing a synchronization check and
17 resolving any differences “at least monthly” (*id.* § 19083(b)), as well as “no more than 30 days
18 prior to . . . [a] Report of Registration (ROR)” (*id.* § 19083(c)). “When differences are identified
19 in a synchronization check,” the Registrar “shall prioritize the correction of data differences” as
20 follows: “(1) Voters in the county EMS and not in the statewide voter registration system;
21 (2) Voters in the statewide voter registration system and not in the county EMS; (3) Data
22 differences between the statewide voter registration system and the county EMS.” (*Id.*
23 § 19083(d).) The synchronization of voter data by the Registrar “shall be within acceptance
24 tolerance criteria based on the number of differences between the county EMS and the statewide
25 voter registration system.” (*Id.* § 19083(f).) For a county such as Los Angeles, which has more
26 than 3 million registered voters, only “8,000 differences [between the registration records are]
27 allowed.” (*Id.* § 19083(f)(2)(F), (f)(2)(G).)

28 g. The Registrar violated its mandatory duty to synchronize county EMS

1 records with the statewide voter registration system to within 8,000 differences. Upon information
2 and belief, the Registrar’s EMS system contained fewer active registrations than the statewide
3 voter registration system. Had the Registrar resolved these differences between the county EMS
4 system and the statewide voter registration system, the Secretary of State would have reported
5 fewer active registrations in Los Angeles County in its January 4, 2022 Report of Registration.

6 h. In addition or in the alternative, the Registrar violated its mandatory duty to
7 mark active Los Angeles County voters as either inactive, cancelled, or otherwise nonactive
8 despite receiving information demonstrating that they legally must be so marked. This includes,
9 but is not limited to, the following:

10 (i) Elections Code § 2222(a)(1): when an elections official receives
11 information “indicat[ing] the voter has moved to a new residence address in California, the county
12 elections official shall immediately update the voter’s registration record.” Upon information and
13 belief, the Registrar received notification that voters previously registered to vote in Los Angeles
14 County had moved out of the county on or before January 4, 2022, but were nonetheless still
15 identified as active registered voters in Los Angeles County.

16 (ii) Elections Code § 2225(a)(2), (c), (f): when an elections official
17 receives information “indicat[ing] that a voter has moved out of state,” the elections official must
18 send the voter a notice and “shall update the status of the voter’s registration to inactive.” Upon
19 information and belief, the Registrar received information indicating that voters previously
20 registered to vote in Los Angeles County had moved out of California on or before January 4,
21 2022, but were nonetheless still identified as active registered voters in Los Angeles County.

22 (iii) Elections Code § 2193: where the Secretary of State receives
23 information from a county elections official during the synchronization process that there are
24 duplicate voter registrations, those registrations shall be merged into one file. Upon information
25 and belief, there are duplicate voter registrations that were separately counted in the January 4,
26 2022 Report of Registration.

27 (iv) Elections Code § 2150(a)(3), Cal. Code Regs., tit. 2, § 19062,
28 19072: an affidavit of registration must contain the voter’s place of residence and their date of

1 birth. (Elec. Code, § 2150(a)(3), (a)(5).) A voter registration record that does not contain such
2 information is considered a “deficient registration record” and is treated the same as an incomplete
3 affidavit of registration. (Cal. Code Regs., tit. 2, § 19062(h).) An incomplete affidavit of
4 registration, in turn, is “held in a separate location in the county EMS from the list of current
5 voters” and is “entered into the [county] EMS” only “[o]nce all required registration information is
6 received.” Likewise, a deficient registration record shall result in a deficiency notice to the
7 Registrar, who must reject the registration within 180 days. (*Id.* § 19072(c).) Upon information
8 and belief, the January 4, 2022 Report of Registration contained Los Angeles County voters
9 whose registrations did not include a place of residence or a date of birth, and thus should not have
10 been counted as active registered voters.

11 (v) Elections Code § 2201(a)(5): the Registrar must cancel a voter
12 registration “[u]pon the death of the person registered.” Upon information and belief, the January
13 4, 2022 Report of Registration contained Los Angeles County persons who were deceased as of
14 the time of the Report of Registration, and thus should not have been counted as active registered
15 voters.

16 (vi) Cal. Code Regs., tit. 2, § 19081(a), (b): “If mailings [to a registered
17 voter] have been returned as undeliverable, or if NCOA, Operation Mail, a returned mailing, or
18 postal service change-of-address data indicates that a voter has moved and left no forwarding
19 address or moved out of state,” the Registrar is required to send the voter a forwardable address
20 confirmation mailing to the voter and “shall update the voter’s record to inactive status.” Upon
21 information and belief, the Registrar may have failed to mark certain voters as inactive as follow:
22 (1) the Registrar failed to timely mark as inactive voters for whom it received
23 undelivered/undeliverable voter notification cards for several years prior to January 4, 2022; and
24 (2) the Registrar failed to timely mark as inactive voters for whom it received
25 undelivered/undeliverable voter-by-mail ballots during and after the election to recall Governor
26 Gavin Newsom. Upon information and belief, those voters were erroneously identified as active
27 registered voters in the January 4, 2022 Report of Registration.

28 (vii) Upon information and belief, the Registrar has otherwise failed to

1 comply with its mandatory duty to mark voters as inactive, cancelled, or otherwise nonactive
2 despite being required by law to do so.

3 i. By failing to comply with its mandatory duty to mark the foregoing voters
4 as inactive or cancelled, the Registrar erroneously informed the Secretary of State that at least
5 265,184 such voters were and should be active registered voters in Los Angeles County when in
6 fact they were not or should not have been so identified. As a result, the Secretary of State
7 erroneously included at least 265,184 more persons in the January 4, 2022 Report of Registration,
8 and thus the Registrar erroneously calculated the number of signatures required to qualify the
9 Recall Petition to be at least 26,518 more persons than should have been required under Elections
10 Code section 11221.

11 42. The Court should thus issue a judicial declaration declaring that the Registrar
12 violated the law by failing to: (1) count as valid any and all incorrectly-rejected Recall Petition
13 signatures identified herein; (2) issue a certificate that accurately identifies the number of valid
14 Recall Petition signatures; and (3) certify to the Los Angeles County Board of Supervisors that the
15 Recall Petition is sufficient.

16 **THIRD CAUSE OF ACTION**

17 **(Injunctive Relief)**

18 43. The Committee incorporates by reference the preceding paragraphs as if fully set
19 forth herein.

20 44. Code of Civil Procedure section 526 authorizes a court to issue injunctive relief.
21 Such relief is warranted: (i) where the moving party “is entitled to the relief demanded, and the
22 relief, or any part thereof, consists in restraining the commission or continuance of the act
23 complained of, either for a limited period or perpetually” (§ 526(a)(1)); (ii) “the commission or
24 continuance of some act during the litigation would produce waste, or great or irreparable injury,
25 to a party to the action” (§ 526(a)(2)); (iii) where “a party to the action is doing, or threatens, or is
26 about to do, or is procuring or suffering to be done, some act in violation of the rights of another
27 party to the action in respecting the subject of the action, and tending to render the judgment
28 ineffectual” (§ 526(a)(3)); or (iv) when pecuniary compensation would not afford adequate relief

1 (§ 526(a)(4)).

2 45. As alleged herein, the Registrar violated the following mandatory duties and/or
3 acted in a manner that is arbitrary, capricious, or unreasonable:

4 a. Elections Code section 11224(a) provides that, “[i]f the elections official’s
5 examination [of a recall petition] shows that the number of valid signatures is greater than the
6 required number, the elections official shall certify the petition to be sufficient.” As alleged
7 herein, the number of valid signatures submitted in support of the Recall Petition was greater than
8 “the required number” because: (1) no fewer than 546,234 valid signatures were submitted in
9 support of the Recall Petition; and (2) no greater than 540,338 valid signatures were required by
10 law to be submitted to qualify for a recall election. Thus, the Registrar had no discretion but to
11 “certify the petition to be sufficient.” The Registrar violated this provision by certifying the Recall
12 Petition to be insufficient despite the number of valid signatures being greater than “the required
13 number.”

14 b. Elections Code section 11227 provides that, “[i]f the elections official finds
15 the signatures on the petition to be sufficient, he or she shall submit his or her certificate as to the
16 sufficiency of the petition to the governing body at its next regular meeting.”⁵ Because the
17 number of valid signatures submitted in support of the Recall Petition was greater than “the
18 required number” of valid signatures under Elections Code section 11224(a), the Registrar had no
19 discretion but to certify the petition to be sufficient. In turn, the Registrar had no discretion but to
20 submit a certificate of sufficiency for the Recall Petition to the Los Angeles County Board of
21 Supervisors. As alleged herein, the Registrar violated this provision by instead submitting a
22 certificate of insufficiency for the Recall Petition to the Los Angeles County Board of Supervisors.

23 c. Elections Code section 11221 specifies the method for calculating the
24 required number of signatures to qualify a recall petition for the ballot. For a county such as Los
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26 _____
27 ⁵ Further, within fourteen days after that submission, the governing body “shall issue an
28 order stating that an election shall be held . . . to determine whether or not the officer named in the
petition shall be recalled.” (Elec. Code, § 11240.)

1 Angeles, which has in excess of 100,000 voter registration, a proponent must submit the signatures
2 of no fewer than 10% of the registered voters in the jurisdiction. The number of registered voters
3 is determined “as of the time of the last report of registration by the county elections official to the
4 Secretary of State pursuant to Section 2187, and prior to the finding by the elections official or
5 Secretary of State that no alterations are required in the form of the recall petition pursuant
6 to Section 11042” (Elec. Code, § 11221(b)), and must include only active voters (Elec. Code,
7 § 2226(b)(2)). With respect to the Recall Petition, the relevant Report of Registration was issued
8 on January 4, 2022, which identified the number of active registered voters in Los Angeles County
9 to be 5,668,569. However, the January 4, 2022 Report of Registration did not accurately identify
10 the number of active registered voters in Los Angeles County as of January 4, 2022. Upon
11 information and belief, the number of active registered voters in Los Angeles County as of January
12 4, 2022 was no greater than 5,403,385.

13 d. Upon information and belief, the January 4, 2022 Report of Registration
14 reported an inflated number of active voter registrations in Los Angeles County because either (i)
15 the Registrar failed to comply with its mandatory duty to notify the Secretary of State of voters
16 whom its records had marked as inactive, cancelled, or otherwise nonactive voters; or (ii) the
17 Registrar failed to comply with its mandatory duty to mark as inactive, cancelled, or nonactive
18 voters whom it was required by law to mark them as such.

19 e. Under Elections Code section 2187(c), the Registrar “shall prepare the
20 information referenced in subdivision (a) and provide notice to the Secretary of State [that such
21 information is available].” The “information referenced in subdivision (a)” includes “the total
22 number of voters in the county.” (Elec. Code, § 2187(a)(1).) For the purposes of Section
23 2187(a)(1), this includes identifying the number of active registrations. (See Elec. Code,
24 § 2226(b)(1).) The Registrar “prepare[s]” this information by “[c]onduct[ing] a synchronization
25 check pursuant to Section 19083” and “[r]esolv[ing] any synchronization issues resulting in
26 incorrect voter counts” (Cal. Code Regs., tit. 2, § 19086(a)(1), (a)(3)), after which the Registrar
27 must “certify the information provided to the Secretary of State” (*id.* § 19086(b)).

28 f. Under California Code of Regulations, Title 2, Section 19083, the Registrar

1 “shall” conduct “regular synchronization checks to compare the voter registration data in the
2 statewide voter registration system with the voter registration data in the county EMS and resolve
3 any differences.” (*Id.* § 19083(a).) This includes completing a synchronization check and
4 resolving any differences “at least monthly” (*id.* § 19083(b)), as well as “no more than 30 days
5 prior to . . . [a] Report of Registration (ROR)” (*id.* § 19083(c)). “When differences are identified
6 in a synchronization check,” the Registrar “shall prioritize the correction of data differences” as
7 follows: “(1) Voters in the county EMS and not in the statewide voter registration system;
8 (2) Voters in the statewide voter registration system and not in the county EMS; (3) Data
9 differences between the statewide voter registration system and the county EMS.” (*Id.*
10 § 19083(d).) The synchronization of voter data by the Registrar “shall be within acceptance
11 tolerance criteria based on the number of differences between the county EMS and the statewide
12 voter registration system.” (*Id.* § 19083(f).) For a county such as Los Angeles, which has more
13 than 3 million registered voters, only “8,000 differences [between the registration records are]
14 allowed.” (*Id.* § 19083(f)(2)(F), (f)(2)(G).)

15 g. The Registrar violated its mandatory duty to synchronize county EMS
16 records with the statewide voter registration system to within 8,000 differences. Upon information
17 and belief, the Registrar’s EMS system contained fewer active registrations than the statewide
18 voter registration system. Had the Registrar resolved these differences between the county EMS
19 system and the statewide voter registration system, the Secretary of State would have reported
20 fewer active registrations in Los Angeles County in its January 4, 2022 Report of Registration.

21 h. In addition or in the alternative, the Registrar violated its mandatory duty to
22 mark active Los Angeles County voters as either inactive, cancelled, or otherwise nonactive
23 despite receiving information demonstrating that they legally must be so marked. This includes,
24 but is not limited to, the following:

25 (i) Elections Code § 2222(a)(1): when an elections official receives
26 information “indicat[ing] the voter has moved to a new residence address in California, the county
27 elections official shall immediately update the voter’s registration record.” Upon information and
28 belief, the Registrar received notification that voters previously registered to vote in Los Angeles

1 County had moved out of the county on or before January 4, 2022, but were nonetheless still
2 identified as active registered voters in Los Angeles County.

3 (ii) Elections Code § 2225(a)(2), (c), (f): when an elections official
4 receives information “indicat[ing] that a voter has moved out of state,” the elections official must
5 send the voter a notice and “shall update the status of the voter’s registration to inactive.” Upon
6 information and belief, the Registrar received information indicating that voters previously
7 registered to vote in Los Angeles County had moved out of California on or before January 4,
8 2022, but were nonetheless still identified as active registered voters in Los Angeles County.

9 (iii) Elections Code § 2193: where the Secretary of State receives
10 information from a county elections official during the synchronization process that there are
11 duplicate voter registrations, those registrations shall be merged into one file. Upon information
12 and belief, there are duplicate voter registrations that were separately counted in the January 4,
13 2022 Report of Registration.

14 (iv) Elections Code § 2150(a)(3), Cal. Code Regs., tit. 2, § 19062,
15 19072: an affidavit of registration must contain the voter’s place of residence and their date of
16 birth. (Elec. Code, § 2150(a)(3), (a)(5).) A voter registration record that does not contain such
17 information is considered a “deficient registration record” and is treated the same as an incomplete
18 affidavit of registration. (Cal. Code Regs., tit. 2, § 19062(h).) An incomplete affidavit of
19 registration, in turn, is “held in a separate location in the county EMS from the list of current
20 voters” and is “entered into the [county] EMS” only “[o]nce all required registration information is
21 received.” Likewise, a deficient registration record shall result in a deficiency notice to the
22 Registrar, who must reject the registration within 180 days. (*Id.* § 19072(c).) Upon information
23 and belief, the January 4, 2022 Report of Registration contained Los Angeles County voters
24 whose registrations did not include a place of residence or a date of birth, and thus should not have
25 been counted as active registered voters.

26 (v) Elections Code § 2201(a)(5): the Registrar must cancel a voter
27 registration “[u]pon the death of the person registered.” Upon information and belief, the January
28 4, 2022 Report of Registration contained Los Angeles County persons who were deceased as of

1 the time of the Report of Registration, and thus should not have been counted as active registered
2 voters.

3 (vi) Cal. Code Regs., tit. 2, § 19081(a), (b): “If mailings [to a registered
4 voter] have been returned as undeliverable, or if NCOA, Operation Mail, a returned mailing, or
5 postal service change-of-address data indicates that a voter has moved and left no forwarding
6 address or moved out of state,” the Registrar is required to send the voter a forwardable address
7 confirmation mailing to the voter and “shall update the voter’s record to inactive status.” Upon
8 information and belief, the Registrar may have failed to mark certain voters as inactive as follow:
9 (1) the Registrar failed to timely mark as inactive voters for whom it received
10 undelivered/undeliverable voter notification cards for several years prior to January 4, 2022; and
11 (2) the Registrar failed to timely mark as inactive voters for whom it received
12 undelivered/undeliverable voter-by-mail ballots during and after the election to recall Governor
13 Gavin Newsom. Upon information and belief, those voters were erroneously identified as active
14 registered voters in the January 4, 2022 Report of Registration.

15 (vii) Upon information and belief, the Registrar has otherwise failed to
16 comply with its mandatory duty to mark voters as inactive, cancelled, or otherwise nonactive
17 despite being required by law to do so.

18 i. By failing to comply with its mandatory duty to mark the foregoing voters as
19 inactive or cancelled, the Registrar erroneously informed the Secretary of State that at least
20 265,184 such voters were and should be active registered voters in Los Angeles County when in
21 fact they were not or should not have been so identified. As a result, the Secretary of State
22 erroneously included at least 265,184 more persons in the January 4, 2022 Report of Registration,
23 and thus the Registrar erroneously calculated the number of signatures required to qualify the
24 Recall Petition to be at least 26,518 more persons than should have been required under Elections
25 Code section 11221.

26 46. The Court should thus issue an injunction compelling the Registrar to: (1) Count as
27 valid any and all incorrectly-rejected Recall Petition signatures identified herein; (2) Re-issue a
28 certificate that accurately identifies the number of valid Recall Petition signatures; and (3) Certify

1 to the Los Angeles County Board of Supervisors that the Recall Petition is sufficient.

2 47. The Committee has no plain, speedy, or adequate remedy at law other than the
3 relief requested herein. Furthermore, the Committee will suffer immediate irreparable injury
4 unless the court issues the injunction sought herein. No money damages or other legal remedy
5 could adequately compensate them for the irreparable harm the Registrar's conduct has caused,
6 continues to cause, and threatens to cause them.

7 48. The Committee is entitled to permanent injunctive relief requiring the Registrar to
8 provide the Committee with access to records and access to office facilities as alleged herein.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Petitioner prays for relief as follows:

- 11 1. That a preemptory writ of mandate or, in the alternative, an alternative writ of
12 mandate issue commanding Respondents to:
- 13 a. Count as valid any and all incorrectly-rejected Recall Petition signatures
14 identified herein;
 - 15 b. Re-issue a certificate that accurately identifies the number of valid Recall
16 Petition signatures; and
 - 17 c. Certify to the Los Angeles County Board of Supervisors that the Recall
18 Petition is sufficient to order a recall election for District Attorney George
19 Gascón.
- 20 2. For a permanent injunction commanding Respondents to take the actions identified
21 in Paragraph 1 above;
- 22 3. For a judicial declaration that Respondents acted unlawfully in certifying that the
23 Recall Petition was insufficient to trigger an election to recall District Attorney
24 George Gascón, purportedly because it was supported by only 520,050 valid
25 signatures and thus it was 46,807 signatures short of the 566,857 signatures needed
26 to trigger a recall election;
- 27 4. For attorney's fees and costs incurred herein; and
- 28 5. For such other and further relief as the court deems just and proper.

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DATED: November 9, 2023

Respectfully submitted,

ELLIS GEORGE CIPOLLONE
O'BRIEN ANNAGUEY LLP
Eric M. George
David J. Carroll
Eugene Lim

By: /s/ David J. Carroll
David J. Carroll

Attorneys for Plaintiff and Petitioner Committee to
Support the Recall of District Attorney George Gascon

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VERIFICATION

I, Kathleen M. Cady, declare as follows:

I am an authorized representative of Plaintiff and Petitioner Committee to Support the Recall of District Attorney George Gascon. I have read the VERIFIED SECOND AMENDED PETITION FOR WRIT OF MANDATE AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF. As to the matters stated therein, I am informed and believe that they are true and correct.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true. Executed on November 9, 2022, at Los Angeles, California.

DocuSigned by:
Kathleen Cady
785283F7ED0E4AF...
Kathleen M. Cady

EXHIBIT 1



**LOS ANGELES COUNTY
REGISTRAR-RECORDER/COUNTY CLERK**

DEAN C. LOGAN

Registrar-Recorder/County Clerk

January 27, 2022

Desiree Andrade



ATTN: Gregory Foster

Dear Ms. Andrade:

This is to inform you that the amended Petition for Recall formats submitted on January 19, 2022 for the proposed recall of George Gascon, District Attorney for the County of Los Angeles, **do meet** the Elections Code requirements as to form and wording.

Elections Code Sections 11220 and 11221 provide that the petitions shall be filed with this office no later than **July 6, 2022** one hundred sixty (160) calendar days from January 27, 2022 and shall be signed by not less than 10% of the registered voters in the electoral jurisdiction. The number of registered voters shall be calculated as of the time of the last report of registration to the Secretary of State, which was January 4, 2022. The number of valid signatures required for the District Attorney will be 566,857. Please see attached.

Pursuant to Elections Code Section 104, a declaration of circulator must be attached to each petition section when submitted. Copies of the relevant sections from the Elections Code are enclosed for your reference.

Should you have further questions, please contact Election Coordination Unit at (562) 462-2912.

Sincerely,

DEAN C. LOGAN

Registrar-Recorder/County Clerk

By: Laticia McCorkle, Assistant Division Manager
Election Information and Preparation Division

State of California

ELECTIONS CODE

Section 104

104. (a) Wherever any petition or paper is submitted to the elections official, each section of the petition or paper shall have attached to it a declaration signed by the circulator of the petition or paper, setting forth, in the circulator’s own hand, the following:

- (1) The printed name of the circulator.
- (2) The residence address of the circulator, giving street and number, or if no street or number exists, adequate designation of residence so that the location may be readily ascertained.
- (3) The dates between which all the signatures to the petition or paper were obtained.

(b) Each declaration submitted pursuant to this section shall also set forth the following:

- (1) That the circulator circulated that section and witnessed the appended signatures being written.
- (2) That according to the best information and belief of the circulator, each signature is the genuine signature of the person whose name it purports to be.
- (3) That the circulator is 18 years of age or older.
- (4) If the petition does not include the disclosure statement described by subdivision (b) of Section 107, that the circulator showed each signer a valid and unfalsified “Official Top Funders” sheet, as required by Section 107.

(c) The circulator shall certify the content of the declaration as to its truth and correctness, under penalty of perjury under the laws of the State of California, with the signature of the circulator’s name. The circulator shall state the date and the place of execution on the declaration immediately preceding the circulator’s signature.

(Amended by Stats. 2019, Ch. 563, Sec. 2. (SB 47) Effective January 1, 2020.)

State of California

ELECTIONS CODE

Section 11220

11220. (a) A recall petition shall be submitted to the elections official for filing in his or her office during normal office hours as posted within the following number of days after the clerk or, in the case of a recall of a state officer, the Secretary of State, notifies the proponents that the form and wording of the petition meets the requirements of Article 3 (commencing with Section 11040) of Chapter 1:

(1) Forty days if the electoral jurisdiction has less than 1,000 registered voters.

(2) Sixty days if the electoral jurisdiction has less than 5,000 registered voters but at least 1,000.

(3) Ninety days if the electoral jurisdiction has less than 10,000 registered voters but at least 5,000.

(4) One hundred twenty days if the electoral jurisdiction has less than 50,000 registered voters but at least 10,000.

(5) One hundred sixty days if the electoral jurisdiction has 50,000 registered voters or more.

(b) For purposes of this section, the number of registered voters shall be that which was reported at the last report of registration by the county elections official to the Secretary of State pursuant to Section 2187 and prior to a finding of the elections official or Secretary of State that no alterations are required in the form of the recall petition pursuant to Section 11042.

(Enacted by Stats. 1994, Ch. 920, Sec. 2.)

State of California

ELECTIONS CODE

Section 11221

11221. The number of qualified signatures required in order to qualify a recall for the ballot shall be as follows:

(a) In the case of an officer of a city, county, school district, community college district, county board of education, or resident voting district, the number of signatures shall be equal in number to not less than the following percent of the registered voters in the electoral jurisdiction:

- (1) Thirty percent if the registration is less than 1,000.
- (2) Twenty-five percent if the registration is less than 10,000 but at least 1,000.
- (3) Twenty percent if the registration is less than 50,000 but at least 10,000.
- (4) Fifteen percent if the registration is less than 100,000 but at least 50,000.
- (5) Ten percent if the registration is 100,000 or above.

(b) For purposes of this section, the number of registered voters shall be calculated as of the time of the last report of registration by the county elections official to the Secretary of State pursuant to Section 2187, and prior to the finding by the elections official or Secretary of State that no alterations are required in the form of the recall petition pursuant to Section 11042.

(c) (1) In the case of a state officer, including judges of courts of appeal and trial courts, the number of signatures shall be as provided for in subdivision (b) of Section 14 of Article II of the California Constitution. In the case of a judge of a superior court, which office has never appeared on the ballot since its creation, or did not appear on the ballot at its last election pursuant to Section 8203, the number of signatures shall be as provided in subdivision (b) of Section 14 of Article II of the California Constitution, except that the percentage shall be based on the number of votes cast within the judicial jurisdiction for the countywide office which had the least number of votes in the most recent general election in the county in which the judge holds his or her office.

(2) For purposes of this subdivision, “countywide office” means an elective office wholly within the county which is voted on throughout the county.

(d) In the case of a landowner voting district, signatures of voters owning at least 10 percent of the assessed value of land within the electoral jurisdiction of the officer sought to be recalled.

(Amended by Stats. 2002, Ch. 784, Sec. 97. Effective January 1, 2003.)

RECEIVED

2022 JAN 19 PM 3:43

COUNTY OF LOS ANGELES
REG-REG.CO. CLK
ELECTIONS

Petition For Recall

TO THE HONORABLE LOS ANGELES COUNTY REGISTRAR — RECORDER/COUNTY CLERK,

Pursuant to the California Constitution and California election laws, we the undersigned registered and qualified electors of the County of Los Angeles, California, respectfully state that we seek the recall and removal of George Gascón, holding the office of District Attorney in the County of Los Angeles, California. We demand an election of a successor to that office.

The following Notice of Intention to Circulate Recall Petition was served on December 8, 2021 to George Gascón.

NOTICE OF INTENTION TO CIRCULATE RECALL PETITION

TO THE HONORABLE George Gascon: Pursuant to Section 11020, California Elections Code, the undersigned registered qualified voters of Los Angeles County, in the State of California, hereby give notice that we are the proponents of a recall petition and that we intend to seek your recall and removal from the office of District Attorney, in Los Angeles County, and to demand election of a successor in that office.

The grounds for the recall are as follows: Since being elected, Los Angeles County District Attorney George Gascon has deserted crime victims and their families. Gascon has disregarded the rule of law and weakened lawful sentencing requirements for the most violent criminals, including murderers, armed robbers, and rapists. George Gascon’s new policies treat career and repeat violent offenders as if they had never committed a crime, ignoring public safety laws approved by the people. Gascon has reduced sentences on crimes against children, and gun crimes. On behalf of crime victims and their families and in the interest of public safety, this notice of intention to recall George Gascon as Los Angeles District Attorney is submitted.

The printed names of the proponents are as follows: Michelle D. Brace, Sarah A. Taillac, Jennifer Brace, Tania Owen, Christine Cortez, Kimberly Cortez, Thomas L. Vardon, Linda J. Bruffard, Kamia Jones, Michael Shane.

The answer of the officer sought to be recalled is as follows:

California DOES NOT NEED another political recall attempt supported by Donald Trump backers and frequent Fox News guests. More than \$270 million in taxpayer money was wasted on the gubernatorial recall attempt in September 2021, which failed by millions of votes. The first recall attempt of District Attorney George Gascon fell short by hundreds of thousands of signatures just months ago, but unlimited attempts are permitted under California’s troubled recall system. In November 2020, Gascon won the election by a quarter-million-vote margin, defeating many of the special interests behind this latest attempt. But those same interests vowed to overturn the will of the voters moments after the election. This is not about keeping Angelenos safe, it’s about a political power grab by well-funded conservative operatives who have fought reforms—on juvenile detention, mental health treatment, police accountability in fatal shootings, and the death penalty—for decades. Do not fall for this latest rightwing attempt. Do not sign this petition. Los Angeles needs to move forward as a safer and less divided community where we focus on preventing crime to keep people safe—not react with political fear-mongering or cable news ratings grabs. District Attorney George Gascon

Each of the undersigned states for himself/herself that he or she is a registered and qualified elector of the County of Los Angeles, California.

| | | | |
|----|--------------------------------------|------------------------|-----|
| 1. | _____ | _____ | |
| | Print Your Name | Residence Address Only | |
| | _____ | _____ | |
| | Your Signature As Registered to Vote | City | Zip |
| 2. | _____ | _____ | |
| | Print Your Name | Residence Address Only | |
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| | Print Your Name | Residence Address Only | |
| | _____ | _____ | |
| | Your Signature As Registered to Vote | City | Zip |

Petition For Recall

TO THE HONORABLE LOS ANGELES COUNTY REGISTRAR — RECORDER/COUNTY CLERK,

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Each of the undersigned states for himself/herself that he or she is a registered and qualified elector of the County of Los Angeles, California.

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|---|--|
| 10. Print Your Name _____ Residence Address Only _____ Your Signature As Registered to Vote _____ City _____ Zip _____ | |
| 11. Print Your Name _____ Residence Address Only _____ Your Signature As Registered to Vote _____ City _____ Zip _____ | |
| 12. Print Your Name _____ Residence Address Only _____ Your Signature As Registered to Vote _____ City _____ Zip _____ | |
| 13. Print Your Name _____ Residence Address Only _____ Your Signature As Registered to Vote _____ City _____ Zip _____ | |
| 14. Print Your Name _____ Residence Address Only _____ Your Signature As Registered to Vote _____ City _____ Zip _____ | |

Petition Instructions

1. Fill in box #1 for yourself.
2. Get your friends and relatives to fill out and sign the other boxes. NOTE: Your petition is valid with just one box filled out.
3. Fill out all of the yellow shaded sections in the "Declaration of Circulator" box.
4. Sign and date your petition.

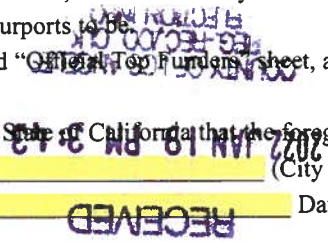
DECLARATION OF PERSON CIRCULATING SECTION OF RECALL PETITION (MUST BE IN CIRCULATOR'S OWN HANDWRITING)

I, _____, solemnly swear (or affirm) all of the following:

1. That I am 18 years of age or older.
2. That my residence address, including street and number, is _____.
(If no street or number exists, a designation of my residence adequate to readily ascertain its location is _____.)
3. That the signatures on this section of the petition form were obtained between _____ (Month and Day), 2022 and _____ (Month and Day), 2022; that I circulated the petition and I witnessed the signatures on this section of the petition form being written; and that, to the best of my information and belief, each signature is the genuine signature of the person whose name it purports to be.
4. That I showed each signer a valid and unfalsified "Official Top Funders" sheet, as required by Elections Code Section 107.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on _____ (Date) at _____ (City or Community Where Signed), California.

Circulator's Signature _____ Date _____





Secretary of State

Elections Division
California Official Statewide Voter Registration System (VoteCal)

Los Angeles
01/04/2022

Report of Registration County Summary

Report Filter(s):

County: Los Angeles

ROR Date: 01/04/2022

| | Registered Voters | Democratic | Republican | American Independent | Green | Libertarian | Peace and Freedom | Unknown | Other | No Party Preference |
|------------------------|-------------------|------------------|----------------|----------------------|---------------|---------------|-------------------|---------------|---------------|---------------------|
| County Supervisorial 1 | 1,019,327 | 552,991 | 147,166 | 24,353 | 4,487 | 7,163 | 8,073 | 9,137 | 6,882 | 259,075 |
| County Supervisorial 2 | 1,088,401 | 670,349 | 110,924 | 27,814 | 3,923 | 7,094 | 7,811 | 8,981 | 9,809 | 241,696 |
| County Supervisorial 3 | 1,220,719 | 659,379 | 198,150 | 33,271 | 5,341 | 9,903 | 5,907 | 9,312 | 8,914 | 290,542 |
| County Supervisorial 4 | 1,179,199 | 609,593 | 228,177 | 34,292 | 4,788 | 9,938 | 8,581 | 8,698 | 8,528 | 266,604 |
| County Supervisorial 5 | 1,160,923 | 528,354 | 285,769 | 36,612 | 4,416 | 10,496 | 5,094 | 8,435 | 8,009 | 273,738 |
| Total | 5,668,569 | 3,020,666 | 970,186 | 156,342 | 22,955 | 44,594 | 35,466 | 44,563 | 42,142 | 1,331,655 |
| US Congressional 23 | 50,420 | 19,214 | 16,623 | 2,222 | 159 | 514 | 290 | 442 | 474 | 10,482 |
| US Congressional 25 | 365,918 | 151,782 | 108,385 | 14,094 | 1,165 | 3,664 | 1,845 | 2,679 | 2,679 | 79,625 |
| US Congressional 26 | 6,500 | 2,531 | 2,145 | 239 | 18 | 54 | 9 | 26 | 60 | 1,418 |
| US Congressional 27 | 401,188 | 192,884 | 79,234 | 9,398 | 1,567 | 2,945 | 1,917 | 3,168 | 2,322 | 107,753 |
| US Congressional 28 | 453,209 | 238,498 | 77,110 | 11,377 | 2,105 | 3,698 | 1,862 | 3,625 | 3,029 | 111,905 |
| US Congressional 29 | 354,027 | 196,198 | 47,245 | 9,264 | 1,582 | 2,714 | 2,690 | 3,355 | 2,798 | 88,181 |
| US Congressional 30 | 469,545 | 241,383 | 90,688 | 13,904 | 1,935 | 4,024 | 2,048 | 3,470 | 3,197 | 108,896 |
| US Congressional 32 | 380,078 | 186,249 | 79,086 | 11,268 | 1,434 | 3,070 | 2,891 | 3,023 | 2,395 | 90,662 |
| US Congressional 33 | 494,692 | 241,290 | 106,922 | 14,528 | 1,923 | 4,660 | 1,245 | 2,841 | 3,670 | 117,613 |
| US Congressional 34 | 332,315 | 202,712 | 30,648 | 7,000 | 1,866 | 2,254 | 2,667 | 3,192 | 2,686 | 79,290 |
| US Congressional 35 | 74,253 | 38,758 | 11,794 | 2,319 | 326 | 676 | 905 | 656 | 514 | 18,305 |
| US Congressional 37 | 429,533 | 278,731 | 35,544 | 10,058 | 1,715 | 2,702 | 2,520 | 3,087 | 3,523 | 91,653 |
| US Congressional 38 | 406,963 | 207,261 | 83,933 | 11,755 | 1,506 | 3,131 | 2,806 | 2,808 | 2,606 | 91,157 |
| US Congressional 39 | 116,201 | 45,989 | 28,585 | 2,755 | 353 | 733 | 502 | 879 | 657 | 35,748 |
| US Congressional 40 | 309,473 | 186,386 | 33,959 | 7,429 | 1,179 | 2,078 | 3,045 | 3,156 | 2,224 | 70,017 |



Secretary of State

Elections Division
California Official Statewide Voter Registration System (VoteCal)

Los Angeles
01/04/2022

| | Registered Voters | Democratic | Republican | American Independent | Green | Libertarian | Peace and Freedom | Unknown | Other | No Party Preference |
|----------------------------|-------------------|------------------|----------------|----------------------|---------------|---------------|-------------------|---------------|---------------|---------------------|
| US Congressional 43 | 402,649 | 236,100 | 52,888 | 10,889 | 1,422 | 2,750 | 2,737 | 3,114 | 3,308 | 89,441 |
| US Congressional 44 | 370,015 | 223,092 | 39,250 | 9,597 | 1,294 | 2,394 | 3,703 | 3,213 | 3,700 | 83,772 |
| US Congressional 47 | 251,823 | 131,748 | 46,171 | 8,252 | 1,411 | 2,536 | 1,785 | 1,831 | 2,302 | 55,787 |
| Total | 5,668,802 | 3,020,806 | 970,210 | 156,348 | 22,960 | 44,597 | 35,467 | 44,565 | 42,144 | 1,331,705 |
| State Senate 18 | 514,232 | 283,205 | 74,332 | 13,916 | 2,263 | 4,106 | 3,211 | 4,421 | 3,964 | 124,814 |
| State Senate 20 | 74,599 | 38,915 | 11,874 | 2,327 | 329 | 682 | 908 | 660 | 517 | 18,387 |
| State Senate 21 | 369,267 | 152,890 | 109,726 | 14,753 | 1,186 | 3,733 | 2,019 | 2,856 | 2,871 | 79,233 |
| State Senate 22 | 479,405 | 234,279 | 85,489 | 12,072 | 1,736 | 3,401 | 3,617 | 4,487 | 2,770 | 131,554 |
| State Senate 23 | 29 | 4 | 15 | 3 | 0 | 1 | 0 | 1 | 0 | 5 |
| State Senate 24 | 446,171 | 277,811 | 39,242 | 8,885 | 2,403 | 2,917 | 3,372 | 3,939 | 3,239 | 104,363 |
| State Senate 25 | 564,276 | 264,476 | 132,020 | 15,680 | 2,352 | 4,802 | 2,151 | 3,976 | 3,654 | 135,165 |
| State Senate 26 | 654,947 | 339,828 | 122,714 | 18,519 | 2,672 | 6,039 | 1,874 | 3,871 | 4,811 | 154,619 |
| State Senate 27 | 406,611 | 195,280 | 91,566 | 12,520 | 1,633 | 3,577 | 1,763 | 2,947 | 2,710 | 94,615 |
| State Senate 29 | 96,522 | 38,486 | 23,076 | 2,271 | 304 | 561 | 443 | 750 | 573 | 30,058 |
| State Senate 30 | 520,247 | 341,207 | 37,001 | 12,502 | 2,071 | 3,038 | 3,955 | 4,536 | 4,964 | 110,973 |
| State Senate 32 | 517,067 | 260,987 | 107,889 | 14,922 | 1,891 | 4,011 | 3,494 | 3,612 | 3,274 | 116,987 |
| State Senate 33 | 454,161 | 265,185 | 55,065 | 12,277 | 2,074 | 3,710 | 4,405 | 4,047 | 3,696 | 103,702 |
| State Senate 34 | 46,266 | 20,769 | 13,284 | 1,545 | 209 | 532 | 126 | 222 | 384 | 9,195 |
| State Senate 35 | 525,002 | 307,484 | 66,917 | 14,156 | 1,837 | 3,487 | 4,129 | 4,240 | 4,717 | 118,035 |
| Total | 5,668,802 | 3,020,806 | 970,210 | 156,348 | 22,960 | 44,597 | 35,467 | 44,565 | 42,144 | 1,331,705 |
| State Assembly 36 | 236,889 | 102,705 | 65,425 | 9,663 | 779 | 2,330 | 1,567 | 2,061 | 1,928 | 50,431 |
| State Assembly 38 | 233,996 | 92,578 | 73,488 | 8,329 | 773 | 2,290 | 779 | 1,420 | 1,595 | 52,744 |
| State Assembly 39 | 252,227 | 135,629 | 37,969 | 6,803 | 1,123 | 2,072 | 1,787 | 2,202 | 2,076 | 62,566 |
| State Assembly 41 | 249,755 | 127,405 | 54,465 | 6,865 | 1,107 | 2,136 | 939 | 1,355 | 1,622 | 53,861 |
| State Assembly 43 | 295,934 | 147,434 | 56,331 | 7,340 | 1,252 | 2,320 | 1,180 | 2,478 | 1,935 | 75,664 |
| State Assembly 44 | 6,500 | 2,531 | 2,145 | 239 | 18 | 54 | 9 | 26 | 60 | 1,418 |
| State Assembly 45 | 295,330 | 147,125 | 60,364 | 8,862 | 1,196 | 2,521 | 1,480 | 2,403 | 1,937 | 69,442 |
| State Assembly 46 | 265,109 | 147,757 | 37,730 | 7,301 | 1,182 | 2,155 | 1,459 | 2,249 | 1,888 | 63,388 |



Secretary of State

Elections Division
California Official Statewide Voter Registration System (VoteCal)

Los Angeles
01/04/2022

| | Registered Voters | Democratic | Republican | American Independent | Green | Libertarian | Peace and Freedom | Unknown | Other | No Party Preference |
|-------------------------------|-------------------|------------------|----------------|----------------------|---------------|---------------|-------------------|---------------|---------------|---------------------|
| State Assembly 48 | 254,616 | 124,264 | 53,979 | 7,678 | 952 | 2,117 | 1,961 | 2,001 | 1,629 | 60,035 |
| State Assembly 49 | 239,070 | 107,104 | 44,473 | 5,156 | 820 | 1,495 | 1,481 | 2,485 | 1,223 | 74,833 |
| State Assembly 50 | 336,697 | 189,667 | 49,958 | 8,993 | 1,497 | 2,844 | 1,009 | 2,178 | 2,500 | 78,051 |
| State Assembly 51 | 240,085 | 152,311 | 20,576 | 4,762 | 1,335 | 1,532 | 1,866 | 1,888 | 1,652 | 54,163 |
| State Assembly 52 | 74,599 | 38,915 | 11,874 | 2,327 | 329 | 682 | 908 | 660 | 517 | 18,387 |
| State Assembly 53 | 199,446 | 120,146 | 18,139 | 4,325 | 1,035 | 1,417 | 1,689 | 2,190 | 1,711 | 48,794 |
| State Assembly 54 | 294,297 | 191,230 | 25,549 | 6,763 | 1,170 | 1,829 | 1,417 | 1,837 | 2,319 | 62,183 |
| State Assembly 55 | 96,522 | 38,486 | 23,076 | 2,271 | 304 | 561 | 443 | 750 | 573 | 30,058 |
| State Assembly 57 | 271,779 | 134,819 | 58,902 | 7,950 | 977 | 2,164 | 1,846 | 1,878 | 1,742 | 61,501 |
| State Assembly 58 | 261,379 | 140,669 | 45,382 | 6,894 | 964 | 1,889 | 1,981 | 1,968 | 1,614 | 60,018 |
| State Assembly 59 | 202,993 | 132,519 | 11,739 | 4,863 | 763 | 1,124 | 2,183 | 2,320 | 2,050 | 45,432 |
| State Assembly 62 | 283,903 | 173,765 | 30,367 | 7,753 | 1,132 | 2,135 | 1,714 | 2,094 | 2,425 | 62,518 |
| State Assembly 63 | 229,554 | 131,337 | 31,908 | 6,072 | 819 | 1,691 | 2,177 | 2,068 | 1,586 | 51,896 |
| State Assembly 64 | 251,201 | 155,734 | 22,480 | 6,407 | 811 | 1,362 | 2,563 | 2,273 | 2,945 | 56,626 |
| State Assembly 66 | 311,996 | 137,827 | 81,580 | 9,374 | 1,028 | 2,973 | 995 | 1,714 | 2,050 | 74,455 |
| State Assembly 70 | 284,920 | 148,848 | 52,310 | 9,357 | 1,594 | 2,904 | 2,034 | 2,067 | 2,567 | 63,239 |
| Total | 5,668,797 | 3,020,805 | 970,209 | 156,347 | 22,960 | 44,597 | 35,467 | 44,565 | 42,144 | 1,331,703 |
| State Board of Equalization 1 | 807,995 | 380,681 | 185,817 | 27,078 | 3,068 | 7,238 | 5,321 | 6,537 | 6,037 | 186,218 |
| State Board of Equalization 3 | 4,860,807 | 2,640,125 | 784,393 | 129,270 | 19,892 | 37,359 | 30,146 | 38,028 | 36,107 | 1,145,487 |
| Total | 5,668,802 | 3,020,806 | 970,210 | 156,348 | 22,960 | 44,597 | 35,467 | 44,565 | 42,144 | 1,331,705 |
| Agoura Hills | 15,237 | 6,835 | 4,098 | 516 | 55 | 167 | 28 | 78 | 117 | 3,343 |
| Alhambra | 45,545 | 23,047 | 7,075 | 987 | 185 | 295 | 287 | 418 | 234 | 13,017 |
| Arcadia | 32,726 | 11,637 | 8,062 | 650 | 113 | 193 | 114 | 256 | 163 | 11,538 |
| Artesia | 8,631 | 4,099 | 1,765 | 193 | 29 | 61 | 68 | 87 | 65 | 2,264 |
| Avalon | 1,815 | 771 | 531 | 61 | 15 | 14 | 12 | 9 | 12 | 390 |
| Azusa | 24,023 | 11,824 | 4,757 | 776 | 103 | 228 | 204 | 194 | 147 | 5,790 |
| Baldwin Park | 34,962 | 19,415 | 4,571 | 805 | 122 | 267 | 331 | 330 | 212 | 8,909 |
| Bell | 14,571 | 9,120 | 1,357 | 290 | 60 | 89 | 153 | 150 | 81 | 3,271 |



Secretary of State

Elections Division
California Official Statewide Voter Registration System (VoteCal)

Los Angeles
01/04/2022

| | Registered Voters | Democratic | Republican | American Independent | Green | Libertarian | Peace and Freedom | Unknown | Other | No Party Preference |
|------------------|-------------------|------------|------------|----------------------|-------|-------------|-------------------|---------|-------|---------------------|
| Bell Gardens | 16,016 | 9,955 | 1,355 | 346 | 65 | 102 | 208 | 159 | 98 | 3,728 |
| Bellflower | 41,205 | 21,422 | 7,482 | 1,325 | 163 | 356 | 355 | 372 | 280 | 9,450 |
| Beverly Hills | 22,519 | 9,643 | 5,559 | 640 | 58 | 128 | 63 | 229 | 147 | 6,052 |
| Bradbury | 615 | 196 | 217 | 15 | 0 | 6 | 2 | 3 | 3 | 173 |
| Burbank | 71,102 | 35,187 | 14,610 | 2,107 | 294 | 634 | 256 | 501 | 532 | 16,981 |
| Calabasas | 16,932 | 7,751 | 4,116 | 560 | 57 | 165 | 44 | 116 | 115 | 4,008 |
| Carson | 62,435 | 36,120 | 8,305 | 1,646 | 179 | 311 | 423 | 483 | 429 | 14,539 |
| Cerritos | 35,662 | 15,239 | 8,528 | 743 | 89 | 203 | 166 | 216 | 170 | 10,308 |
| Claremont | 23,497 | 11,637 | 5,620 | 710 | 111 | 210 | 96 | 115 | 151 | 4,847 |
| Commerce | 7,081 | 4,519 | 692 | 161 | 41 | 56 | 71 | 68 | 35 | 1,438 |
| Compton | 48,728 | 32,441 | 2,783 | 1,239 | 139 | 244 | 479 | 491 | 599 | 10,313 |
| Covina | 30,596 | 14,167 | 7,628 | 1,020 | 103 | 284 | 234 | 200 | 204 | 6,756 |
| Cudahy | 8,893 | 5,529 | 748 | 165 | 26 | 58 | 108 | 109 | 54 | 2,096 |
| Culver City | 28,536 | 18,200 | 2,991 | 634 | 110 | 198 | 70 | 131 | 178 | 6,024 |
| Diamond Bar | 34,223 | 13,062 | 8,987 | 829 | 106 | 215 | 122 | 253 | 192 | 10,457 |
| Downey | 64,890 | 33,899 | 12,948 | 1,930 | 231 | 525 | 411 | 447 | 429 | 14,070 |
| Duarte | 13,244 | 6,566 | 2,745 | 385 | 50 | 98 | 63 | 79 | 72 | 3,186 |
| El Monte | 44,308 | 22,947 | 6,124 | 1,113 | 144 | 305 | 436 | 564 | 227 | 12,448 |
| El Segundo | 12,470 | 5,257 | 3,351 | 479 | 45 | 161 | 24 | 67 | 98 | 2,988 |
| Gardena | 35,776 | 21,195 | 4,906 | 870 | 97 | 208 | 227 | 265 | 242 | 7,766 |
| Glendale | 114,106 | 49,266 | 25,480 | 2,914 | 429 | 834 | 504 | 1,250 | 714 | 32,715 |
| Glendora | 35,059 | 12,143 | 13,131 | 1,293 | 111 | 359 | 138 | 215 | 241 | 7,428 |
| Hawaiian Gardens | 6,022 | 3,318 | 795 | 164 | 18 | 34 | 76 | 71 | 33 | 1,513 |
| Hawthorne | 43,816 | 26,270 | 4,883 | 1,185 | 170 | 295 | 317 | 362 | 338 | 9,996 |
| Hermosa Beach | 14,408 | 6,392 | 3,302 | 484 | 48 | 217 | 28 | 63 | 113 | 3,761 |
| Hidden Hills | 1,372 | 520 | 441 | 41 | 2 | 15 | 1 | 8 | 15 | 329 |
| Huntington Park | 21,973 | 13,848 | 1,859 | 448 | 84 | 164 | 210 | 193 | 137 | 5,030 |
| Industry | 106 | 36 | 35 | 7 | 2 | 1 | 0 | 1 | 0 | 24 |



Secretary of State

Elections Division
California Official Statewide Voter Registration System (VoteCal)

Los Angeles
01/04/2022

| | Registered Voters | Democratic | Republican | American Independent | Green | Libertarian | Peace and Freedom | Unknown | Other | No Party Preference |
|----------------------|-------------------|------------|------------|----------------------|-------|-------------|-------------------|---------|--------|---------------------|
| Inglewood | 63,679 | 43,960 | 3,291 | 1,596 | 230 | 325 | 447 | 516 | 492 | 12,822 |
| Irwindale | 1,044 | 626 | 158 | 37 | 5 | 9 | 7 | 6 | 2 | 194 |
| La Canada Flintridge | 15,602 | 5,985 | 4,960 | 358 | 40 | 137 | 16 | 62 | 80 | 3,964 |
| La Habra Heights | 4,177 | 1,179 | 1,795 | 144 | 14 | 45 | 15 | 33 | 26 | 926 |
| La Mirada | 31,225 | 12,458 | 10,052 | 1,042 | 104 | 261 | 116 | 162 | 207 | 6,823 |
| La Puente | 19,029 | 10,984 | 2,501 | 445 | 67 | 128 | 178 | 167 | 109 | 4,450 |
| La Verne | 22,689 | 8,267 | 8,541 | 817 | 91 | 203 | 91 | 106 | 143 | 4,430 |
| Lakewood | 55,288 | 25,379 | 14,314 | 1,996 | 216 | 514 | 281 | 340 | 399 | 11,849 |
| Lancaster | 90,989 | 40,443 | 23,822 | 3,857 | 285 | 916 | 672 | 872 | 936 | 19,186 |
| Lawndale | 16,278 | 8,825 | 2,420 | 487 | 60 | 134 | 126 | 145 | 115 | 3,966 |
| Lomita | 12,892 | 5,681 | 3,471 | 442 | 60 | 133 | 71 | 78 | 92 | 2,864 |
| Long Beach | 272,141 | 145,894 | 45,538 | 8,673 | 1,463 | 2,679 | 2,305 | 2,098 | 2,486 | 61,005 |
| Los Angeles | 2,142,069 | 1,238,020 | 276,710 | 54,762 | 9,604 | 16,090 | 13,548 | 17,758 | 17,203 | 498,374 |
| Lynwood | 29,661 | 18,922 | 2,213 | 655 | 95 | 172 | 279 | 249 | 289 | 6,787 |
| Malibu | 8,394 | 3,925 | 1,936 | 275 | 41 | 91 | 18 | 50 | 77 | 1,981 |
| Manhattan Beach | 26,912 | 11,254 | 7,621 | 827 | 73 | 291 | 31 | 98 | 201 | 6,516 |
| Maywood | 10,453 | 6,570 | 834 | 194 | 50 | 66 | 124 | 93 | 73 | 2,449 |
| Monrovia | 23,488 | 10,958 | 5,624 | 779 | 118 | 231 | 116 | 129 | 144 | 5,389 |
| Montebello | 33,016 | 19,127 | 4,731 | 813 | 149 | 228 | 268 | 251 | 209 | 7,240 |
| Monterey Park | 31,805 | 14,707 | 5,073 | 626 | 113 | 181 | 198 | 376 | 173 | 10,358 |
| Norwalk | 56,328 | 30,584 | 9,352 | 1,473 | 191 | 418 | 445 | 498 | 345 | 13,022 |
| Palmdale | 88,199 | 43,232 | 19,363 | 3,319 | 270 | 777 | 603 | 791 | 566 | 19,278 |
| Palos Verdes Estates | 10,749 | 3,462 | 4,070 | 340 | 21 | 73 | 14 | 57 | 65 | 2,647 |
| Paramount | 25,362 | 15,219 | 2,704 | 626 | 83 | 179 | 254 | 368 | 140 | 5,789 |
| Pasadena | 89,841 | 50,782 | 14,493 | 2,131 | 404 | 750 | 321 | 578 | 594 | 19,788 |
| Pico Rivera | 36,852 | 22,692 | 4,886 | 856 | 133 | 217 | 286 | 201 | 220 | 7,361 |
| Pomona | 74,253 | 38,758 | 11,794 | 2,319 | 326 | 676 | 905 | 656 | 514 | 18,305 |
| Rancho Palos Verdes | 30,682 | 11,710 | 9,885 | 839 | 81 | 259 | 55 | 162 | 215 | 7,476 |



Secretary of State

Elections Division
California Official Statewide Voter Registration System (VoteCal)

Los Angeles
01/04/2022

| | Registered Voters | Democratic | Republican | American Independent | Green | Libertarian | Peace and Freedom | Unknown | Other | No Party Preference |
|-----------------------|-------------------|------------------|----------------|----------------------|---------------|---------------|-------------------|---------------|---------------|---------------------|
| Redondo Beach | 48,510 | 21,988 | 11,570 | 1,596 | 194 | 555 | 110 | 228 | 331 | 11,938 |
| Rolling Hills | 1,564 | 397 | 718 | 43 | 2 | 22 | 3 | 10 | 18 | 351 |
| Rolling Hills Estates | 6,471 | 2,222 | 2,358 | 162 | 20 | 52 | 7 | 23 | 35 | 1,592 |
| Rosemead | 23,803 | 11,193 | 3,532 | 553 | 86 | 157 | 236 | 368 | 129 | 7,549 |
| San Dimas | 23,529 | 8,599 | 8,469 | 879 | 83 | 213 | 100 | 129 | 165 | 4,892 |
| San Fernando | 12,282 | 7,289 | 1,411 | 275 | 60 | 86 | 96 | 98 | 76 | 2,891 |
| San Gabriel | 19,578 | 8,828 | 3,545 | 409 | 52 | 111 | 123 | 223 | 85 | 6,202 |
| San Marino | 9,161 | 2,910 | 2,739 | 163 | 17 | 60 | 10 | 68 | 46 | 3,148 |
| Santa Clarita | 145,669 | 56,059 | 48,316 | 5,488 | 450 | 1,516 | 468 | 848 | 1,019 | 31,505 |
| Santa Fe Springs | 11,311 | 6,214 | 2,009 | 318 | 42 | 78 | 85 | 81 | 74 | 2,410 |
| Santa Monica | 68,546 | 40,848 | 7,937 | 1,818 | 395 | 586 | 199 | 356 | 524 | 15,883 |
| Sierra Madre | 8,603 | 3,994 | 2,276 | 250 | 40 | 108 | 19 | 38 | 68 | 1,810 |
| Signal Hill | 7,357 | 3,908 | 1,186 | 254 | 37 | 67 | 36 | 57 | 57 | 1,755 |
| South El Monte | 8,946 | 5,034 | 1,062 | 239 | 33 | 58 | 65 | 79 | 56 | 2,320 |
| South Gate | 46,011 | 28,552 | 4,670 | 967 | 132 | 318 | 432 | 380 | 258 | 10,302 |
| South Pasadena | 17,825 | 10,150 | 2,588 | 335 | 80 | 134 | 38 | 69 | 106 | 4,325 |
| Temple City | 20,532 | 8,002 | 4,583 | 435 | 64 | 133 | 104 | 180 | 100 | 6,931 |
| Torrance | 92,704 | 38,938 | 26,262 | 2,878 | 328 | 862 | 298 | 501 | 569 | 22,068 |
| Vernon | 124 | 60 | 16 | 3 | 2 | 3 | 0 | 1 | 0 | 39 |
| Walnut | 19,348 | 7,474 | 4,545 | 424 | 49 | 89 | 55 | 129 | 104 | 6,479 |
| West Covina | 62,301 | 30,255 | 12,950 | 1,794 | 248 | 431 | 478 | 478 | 440 | 15,227 |
| West Hollywood | 27,137 | 17,641 | 2,425 | 677 | 119 | 217 | 69 | 150 | 170 | 5,669 |
| Westlake Village | 6,500 | 2,531 | 2,145 | 239 | 18 | 54 | 9 | 26 | 60 | 1,418 |
| Whittier | 54,618 | 26,356 | 13,643 | 1,869 | 242 | 488 | 340 | 295 | 356 | 11,029 |
| Unincorporated Area | 570,175 | 298,288 | 105,266 | 15,821 | 2,126 | 4,316 | 3,968 | 4,297 | 4,306 | 131,787 |
| Total | 5,668,802 | 3,020,806 | 970,210 | 156,348 | 22,960 | 44,597 | 35,467 | 44,565 | 42,144 | 1,331,705 |

EXHIBIT 2



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN

Registrar-Recorder/County Clerk

NEWS RELEASE

FOR IMMEDIATE RELEASE

July 9, 2022

Contact

Mike Sanchez: (562) 462-2648

Media Info: (562) 462-2833

Los Angeles County Registrar-Recorder/County Clerk Review and Verification of District Attorney Recall Petitions

LOS ANGELES – Los Angeles County Registrar-Recorder/County Clerk (RR/CC) Dean C. Logan announced that his office has completed the first step in the review of the petitions submitted on July 6 in the Los Angeles County District Attorney Recall Attempt.

The RR/CC conducted a raw count of signatures submitted on the petitions and determined that number to be 715,833.

The RR/CC must complete the review and verification of the petition signatures no later than August 17. As authorized in the [California Elections Code § 11225](#), the RR/CC will use the random sampling technique for the verification of petition signatures. The random sample is 5% of the total number of signatures submitted.

Based on the random sampling results, the petition will be certified as sufficient, require verification of all signatures submitted, or certified as insufficient. These outcomes are determined based on the procedures and legal thresholds for sufficiency set forth in the California Elections Code and [California Code of Regulations](#).

If the petition meets the sufficiency requirement, the RR/CC must certify sufficiency to the Los Angeles County Board of Supervisors at its next regular meeting.

The date of a recall election will be based on the timing of the verification and determination of sufficiency. The earliest a recall election could be held would be at the same time as the November 8, 2022 Gubernatorial General Election. If conditions are not met, a Special Recall Election would likely take place between late December 2022 and mid-January 2023.

The mission of the Registrar-Recorder/County Clerk is to serve Los Angeles County by providing essential records management and election services in a fair, accessible, and transparent manner. For more information, visit LAVOTE.GOV and follow us on Twitter @LACountyRRCC.

###



EXHIBIT 3



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN

Registrar-Recorder/County Clerk

NEWS RELEASE

FOR IMMEDIATE RELEASE

August 15, 2022

Contact

Mike Sanchez: (562) 462-2648

Media Info: (562) 462-2833

Registrar-Recorder/County Clerk Completes Petition Verification for District Attorney Recall Attempt *Petition found insufficient to qualify the recall for the ballot*

LOS ANGELES – Los Angeles County Registrar-Recorder/County Clerk (RR/CC) Dean C. Logan announced the RR/CC has completed the examination and verification of all [715,833 petition signatures submitted for the recall of Los Angeles County District Attorney George Gascon](#).

Based on the examination and verification, which was conducted in compliance with the statutory and regulatory requirements of the [California Government Code](#), [Elections Code](#), and [Code of Regulations](#), **520,050 signatures were found to be valid and 195,783 were found to be invalid**. To qualify the recall for the ballot, the petition required 566,857 valid signatures; therefore, the petition has failed to meet the sufficiency requirements and no further action shall be taken on the petition.

A summary breakdown of the invalid signatures is as follows:

- Not Registered: 88,464
- Max Number of Times Signed (Duplicate): 43,593
- Different Address: 32,187
- Mismatch Signature: 9,490
- Canceled: 7,344
- Out of County Address: 5,374
- Other: 9,331

The RR/CC has notified the proponents of these findings. Per California Elections Code § 11301 and Government Code § 6253.5, proponents of the recall petition may examine the petition signatures if desired, provided that such examination must commence no later than 21 days after the certification of insufficiency of the petition.

The mission of the Registrar-Recorder/County Clerk is to serve Los Angeles County by providing essential records management and election services in a fair, accessible, and transparent manner. For more information, visit LAVOTE.GOV and follow us on Twitter @LACountyRRCC.

###



EXHIBIT 4

Certification of Registrar-Recorder/County Clerk County of Los Angeles

CLERK'S CERTIFICATE TO INITIATIVE PETITION

I, DEAN C. LOGAN, Registrar-Recorder/County Clerk of the County of Los Angeles, do hereby certify:

That the RECALL AND REMOVAL OF GEORGE GASCON, HOLDING THE OFFICE OF DISTRICT ATTORNEY IN THE COUNTY OF LOS ANGELES, CALIFORNIA petition was filed with this office on July 6, 2022.

That said petition consists of 114,434 sections; containing 715,833 signatures;

That each section contains signatures purporting to be the signatures of qualified electors of this county;

That attached to this petition at the time it was filed was an affidavit purporting to be the affidavit of the person who solicited the signatures, and containing the dates between which the purported qualified electors signed this petition;

That the affiant stated his or her own qualifications, that he or she had solicited the signatures upon that section, that all of the signatures were made in his or her presence, and that to the best of his or her knowledge and belief each signature to that section was the genuine signature of the person whose name it purports to be;

That after the proponent filed this petition, I verified the required number of signatures by examining the records of the registration in this county, current and in effect at the respective purported dates of such signing, to determine what number of qualified electors signed the petition, and from that examination I have determined the following facts regarding this petition:

| | |
|---|---------|
| 1. Number of unverified signatures filed by proponent | 715,833 |
| 2. Number of signatures verified | 715,833 |
| a. Number of signatures found SUFFICIENT | 520,050 |
| b. Number of signatures found NOT SUFFICIENT | 195,783 |

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 15th day of August 2022.



Dean C. Logan

DEAN C. LOGAN
Registrar-Recorder/County Clerk
County of Los Angeles

EXHIBIT 5

Petition Statistics

8/15/2022 8:22:00AM

RECALL OF LA COUNTY DISTRICT
ATTORNEY GEORGE GASCON

Petition ID:17857

| | |
|----------------------|---------|
| Total Sigs Required | 0 |
| Total Sigs Submitted | 715,833 |
| Total Sample Size | 715,833 |
| Total Sigs Verified | 715,833 |

| | | TOTAL CHALLENGED |
|--------------|----------------------------|------------------|
| 0CADD | OUT OF COUNTY ADDRESS | |
| | Total | 5,374 |
| ADD | DIFFERENT ADDRESS | |
| | Total | 32,187 |
| AEV | INFO ENTERED BY CIRCULATOR | |
| | Total | 2,563 |
| AGE | UNDERAGE AT SIGNING | |
| | Total | 69 |
| CAN | CANCELED | |
| | Total | 7,344 |
| FP | FATAL PENDING | |
| | Total | 1,841 |
| MADD | PO BOX/MAILING ADDRESS | |
| | Total | 622 |
| MAX | MAX NUMBER OF TIMES SIGNED | |
| | Total | 43,593 |
| MS | MISCELLANEOUS | |
| | Total | 289 |
| MS2 | PRINTED SIGNATURE | |
| | Total | 1,525 |
| MSPET | MISSING SIG ON PETITION | |
| | Total | 666 |
| NADD | NO ADDRESS | |
| | Total | 754 |
| NR | NOT REGISTERED | |
| | Total | 88,464 |
| RD | INVALID REGISTRATION DATE | |
| | Total | 1,001 |
| SIG | MISMATCH SIGNATURE | |
| | Total | 9,490 |
| WD | WITHDRAWN SIGNATURES | |
| | Total | 1 |
| TOTAL | | 195,783 |

TOTAL VALID : 520,050

EXHIBIT 6



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN

Registrar-Recorder/County Clerk

October 24, 2022

VIA E-MAIL

Marian Thompson

Email: [REDACTED]

RE: Public Records Act Request

Dear Marian Thompson,

This letter responds to your California Public Records Act request, submitted to the Los Angeles County Registrar-Recorder/County Clerk ("County") on October 14, 2022. Specifically, you requested the following information:

1. *All communications in writing with Judicial Watch, or its attorneys of records, describing in summary Los Angeles County's existing programs, activities, and procedures for complying with the list maintenance requirements of Section 8 of the NVRA, including programs relating to felons and those adjudicated mentally incompetent for the period covering January 1, 2019, through and including December 31, 2021.*
2. *The number of active registrations in Los Angeles County as of December 31, 2021.*
3. *The total number of registrations on Los Angeles County's inactive file of registered voters as of December 31, 2021.*
4. *The number of registrations placed on Los Angeles County's inactive file since January 1, 2019, and each year thereafter up through and including December 31, 2021.*
5. *The number of registrations that have been continuously on Los Angeles County's inactive file (or that have shown no voting-related activity) as of December 31, 2021:*
 - (i) *two consecutive general federal elections,*
 - (ii) *three consecutive general federal elections,*
 - (iii) *four consecutive general federal elections, and*
 - (iv) *five or more consecutive general federal elections.*

6. *The number of Section 8(d)(2) Notices that Los Angeles County has sent annually since January 1, 2019, and for each year thereafter through December 31, 2021:*
 - (i) *sent to registrants,*
 - (ii) *received back from registrants confirming registration,*
 - (iii) *received back confirming registration should be invalidated,*
 - (iv) *received back as undeliverable, and*
 - (v) *sent but did not receive back.*
7. *All updates to, or new, manuals, formal guidance, advisory opinions, training materials, FAQs, and administrative regulations governing or concerning how Los Angeles County is to comply with the list maintenance requirements of Section 8 of the NVRA, including programs relating to felons and those adjudicated mentally incompetent, since January 1, 2019, and for each year thereafter through December 31, 2021.*
8. *Consistent with the NVRA, all steps taken by Los Angeles County to identify registered voters who may have died in other California counties or in other states, including reviewing any existing contracts relating to this subject, and the use of the Social Security Administration's Death Master File for this purpose, since January 1, 2019, and for each year thereafter through December 31, 2021.*
9. *The number of registrants identified by Los Angeles County who have died in other California counties or in other states, since January 1, 2019, and for each year thereafter through December 31, 2021.*
10. *The number of registrants placed on the inactive file of registered voters and/or canceled by Los Angeles County as the result of such registrants' death in other California counties or in other states, since January 1, 2019, and for each year thereafter through December 31, 2021.*
11. *All steps taken by Los Angeles County to implement programs to identify registrants who may have moved or died, to send notices pursuant to 52 U.S.C. §20507(d)(2), to place registrants on the inactive file of registered voters, and to comply with the NVRA, since January 1, 2019, and for each year thereafter through December 31, 2021.*
12. *The number of registrants Los Angeles County has identified as having moved or died, sent notices pursuant to 52 U.S.C. § 20507(d)(2), placed registrants on the inactive file of registered voters, or canceled, since January 1, 2019, and for each year thereafter through December 31, 2021.*

Under the California Public Records Act ("CPRA"), the County has a duty to disclose records to the public to the extent the County understands the request, responsive records exist and can be located, and the information contained in the responsive records are not subject to, in whole or in part, legal exemptions from disclosure. However, the Public Records Act does not require the County to answer questions or to create a record that does not exist at the time of the request. (See Gov. Code § 6252(e); *Haymie v. Superior Court* (2001) 26 Cal.4th 1061, 1075.)

Item Nos. 1, 7, and 11. With respect to Item Nos. 1, 7, and 11 of your request, the County has conducted a diligent search and located records responsive to your request. However, some of

the information is exempt from disclosure, as address below.

Government Code section 6254(k) allows an agency to withhold records, the disclosure of which is exempted or prohibited pursuant to Federal or State law, including the Evidence Code. State law protects confidential and proprietary information from disclosure, and federal, state, and common law protect trade secrets from disclosure. (See, e.g., Govt. Code §§ 6254(k), 6255(a); Evid. Code § 1060; and Civ. Code §§ 3426 et seq.) Records containing confidential, proprietary, official, or privileged information are thus exempt and have been redacted from the records attached herewith.

Further, any records or portions of records containing information that would increase information security risks have been redacted as appropriate. Government Code section 6254.19 exempts such records from disclosure if they would reveal vulnerabilities to, or otherwise increase the potential for an attack on an information technology system, including the voting system. Information that would increase the potential for an attack on the County's voting system has been redacted.

Government Code section 6255 allows an agency to withhold a record by demonstrating that "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." (*CBS Broadcasting, Inc. v. Superior Court* (2001) 91 Ca1.App.4th 892; *Times Mirror Co. v. Superior Court* (1991) 53 Ca1.3d 1325; Gov. Code § 6255(a).) This is an additional basis for withholding computer and information security records. As the legislature found in creating these exemptions, the public interest is not served if such materials are disclosed as the disclosure could jeopardize the voting system. Therefore, such records were withheld or redacted as appropriate.

Further, records containing personal and/or private information of individuals and voters, the disclosure of which would constitute an unwarranted invasion of personal privacy, are exempt from disclosure. (See Cal. Const., art. 1, § 1; Gov. Code §§ 6254(c), 6254.4, 6255;2 CCR § 19001 et seq.; *City of San Jose v. Superior Court* (1999) 74 Cal.App.4th 1008, 1019-1020.) Thus, any record containing personal and/or private information of individuals and voters such as name, address, date of birth, driver's license number, employee number, or signature are exempt from disclosure and have been redacted.

All responsive non-exempt records are enclosed hereto.

Item Nos. 2 – 6. Item Nos. 2 – 6 seek answers to questions or documents that do not exist. Therefore, the County is under no obligation to respond to those requests under the Public Records Act or produce documents that do not exist. Notwithstanding the foregoing, please be informed of the following:

With respect to Item 2 of your request, the number of active registrations in Los Angeles County as of December 31, 2021, is 5,438,400.

With respect to Item 3 of your request, the total number of registrations on Los Angeles County's inactive file of registered voters as of December 31, 2021, is 1,672,648.

With respect to Item 4 of your request, the number of registrations placed on Los Angeles County's inactive file since January 1, 2019, and each year thereafter up through and including December 31, 2021, are as follows:

- 2019 – 118,583

- 2020 – 101,162
- 2021 – 317,549

With respect to Item 5 of your request, the number of registrations that have been continuously on Los Angeles County's inactive file or have not shown voting related activity as of December 31, 2021, are as follows:

- Two consecutive general federal elections: 1,207,613
- Three consecutive general federal elections – 814,727
- Four consecutive general federal elections – 685,572
- Five or more consecutive general federal elections – 634,619

With respect to Item 6 of your request, the number of Section 8(d)(2) Notices that Los Angeles County has sent annually since January 1, 2019, and for each year thereafter through December 31, 2021, are as follows:

- Sent to registrants: 2019 – 1,672,399, 2020 – 138,893, and 2021 – 327,335
- Received back from registrants confirming registration: 2019 – 57,058, 2020 – 24,121, 2021 – 25,529
- Received back from registrants confirming registration should be invalid: 2019 – 5,759, 2020 – 5,686, 2021 – 14,339
- Received back as undeliverable: 2019 – 1,535,009, 2020 – 7,981, 2021 – 11,054
- Sent but did not receive back: 2019 – 74,573, 2020 – 101,105, 2021 – 276,413

Item Nos. 8 – 10. With respect to Item Nos. 8 – 10 of your request, the County could not find records responsive to your request. The State provides the County with vote file maintenance data on deceased voters through VoteCal, the statewide voter registration database. The County does not independently use the Social Security Administration's Death Master File, nor does the County independently identify voters that have died in other California Counties or States.

Item No. 12. With respect to Item No. 12 of your request, the County continues to identify, locate, and collect potentially responsive records. The County will provide you with a determination within 14 days, as to whether or not we are able to identify any disclosable records.

Should you have any further inquiries, please forward those to our office for review.

Respectfully,

DEAN C. LOGAN
Registrar-Recorder/County Clerk



JULANE WHALEN
Registrar-Recorder/County Clerk
Executive Office

Enclosure(s)

EXHIBIT 7



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN

Registrar-Recorder/County Clerk

August 19, 2022

SENT VIA EMAIL: [REDACTED]

Dear Ms. Thompson,

This responds to your email of August 18, 2022 – “Rev Request to Inspect Recall Petition”.

Please note that this office transmitted correspondence on the same date to the designee on record for the proponents of the Recall requesting clarification and designation of a single point of contact for purposes of any official request to examine the petitions.

The deadline to commence the Petition examination is September 2, 2022. A designated representative for the Proponent will need to submit a written request for the Petition examination and the names of the individuals designated to participate on behalf of the Proponent.

During this review, the Proponent and their representative(s) (Proponent) designated in writing will have the opportunity to review the Petition signatures that were disqualified and the reasons for their disqualification. This includes viewing the Petition itself and the voter record data or information that led to the disqualification of the signature.

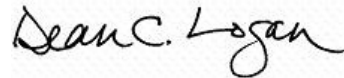
On your inquiry regarding the manner by which any questions and/or challenges may be presented, Government Code Section 6253.5 governs the scope of the Petition examination by Proponent following the elections official's finding of petition insufficiency. Pursuant to Government Code Section 6253.5(a), Proponent is permitted to examine the Petition and all memoranda prepared by this office in the examination of the Petition "in order to determine which signatures were disqualified and the reasons therefor." The statute does not provide for any challenge process, and there is no authority for this office to accept or adjudicate challenges, nor is there any authority to reconsider, modify, or re-issue the certificate of results after a finding of insufficiency. This is consistent with law and the practice of this office for all Statewide, County, City, and District initiative, referendum, and recall petitions. To the extent there are any questions in connection with the examination of the Petition to determine which signatures were disqualified and the reasons therefor, Proponent may submit these questions in writing to our office, and our office will review and respond to the questions

Ms. Marian Thompson
August 19, 2022
Page 2

accordingly as part of the Petition examination. The examination will take place at the Registrar-Recorder/County Clerk's office at: 12400 Imperial Highway, Norwalk, CA 90650 during normal office hours. The dates will be determined once a written request has been submitted by the Proponent to our office.

If the Proponent would like to schedule an examination, please submit the written request to Alex Olvera at aolvera@rrcc.lacounty.gov.

Regards,



DEAN C. LOGAN
Registrar-Recorder/County Clerk

DCL:JG
MF:EC

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PROOF OF SERVICE

**Committee to Support the Recall of District Attorney George Gascon v. Dean C. Logan, et al.
23STCP02365**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 3000, Los Angeles, CA 90067.

On November 9, 2023, I served true copies of the following document(s) described as **VERIFIED SECOND AMENDED PETITION FOR WRIT OF MANDATE AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF; SUMMONS ON FIRST AMENDED PETITION/COMPLAINT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: On November 9, 2023, I caused a copy of the document(s) to be sent from e-mail address jberk@egcfirm.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on November 9, 2023, at Los Angeles, California.



Jeremy Berk

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Counsel for Defendants and Respondents

Dean C. Logan and the Office of the Los Angeles County Registrar-Recorder/County Clerk