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Logan, in his official capacity as the
County of Los Angeles Registrar-
Recorder/County Clerk
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8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES, SOUTH DISTRICT**

11 LONG BEACH REFORM
12 COALITION, a California political
action committee; CORLISS LEE, an
13 individual,
14
 Petitioners,
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 v.
16 DEAN C. LOGAN, Registrar-
Recorder/County Clerk for Los Angeles
17 County, Respondent; MONIQUE DE
LA GARZA, City Clerk of Long Beach,
18 Respondent; DAWN A. MCINTOSH,
as City Attorney of Long Beach, Real
19 Party in Interest,
20
 Respondents.

CASE NO. 23LBCP00476

**RESPONDENT DEAN LOGAN'S
OPPOSITION TO EX PARTE
APPLICATION FOR PEREMPTORY
WRIT OF MANDATE, OR TO SHORTEN
TIME FOR HEARING ON
PEREMPTORY WRIT OF MANDATE;
MEMORANDUM OF POINTS AND
AUTHORITIES AND DECLARATION OF
AMAN BHULLAR IN SUPPORT
THEREOF**

Assigned to the Hon. Judge Mark C. Kim,
Dept. S27

DATE: January 3, 2024
TIME: 8:30
DEPT.: S27

Action Filed: December 28, 2023

21
22
23 Respondent Dean C. Logan, in his official capacity as the County of Los Angeles
24 Registrar-Recorder/County Clerk ("County Registrar"), hereby submits his memorandum of points
25 and authorities in opposition to Petitioners Long Beach Reform Coalition and Corliss Lee's
26 (collectively, "Petitioners") Ex Parte Application for Peremptory Writ of Mandate, or to Shorten
27 Time for Hearing on Peremptory Writ of Mandate ("Application").
28

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 This Court is requested to deny Petitioners' Application because any relief at this late date
4 would cause substantial interference with the printing and mailing of vote by mail ballots and the
5 conduct of the March 5, 2024 Statewide Presidential Primary Election ("Election"). California
6 Elections Code ("Elec. Code") sections ("§§") 9295(b)(2), 13314 (issuance of writ must not
7 substantially interfere with the printing or distribution of election materials or the conduct of the
8 election). For the case at bar, the deadline to resolve any dispute concerning the text of the ballot
9 measure question to appear on ballots for the Election is December 28, 2023. This deadline is set
10 to allow for the printing and mailing of vote by mail ballots to military service and overseas voters
11 per statutory requirements. *See* Elec. Code § 3114; 52 U.S.C. § 20302. Based on the record,
12 Petitioners have known about the substantive issues at dispute as early as October 2023 and at
13 least by early December, and Petitioners were aware of the County of Los Angeles' ("County")
14 Calendar of Events for the Election. Petition for Writ of Mandate ("Petition"), ¶¶ 38-39, Exh. A,
15 H; Declaration of Alexander H. Haberbusch ("Haberbusch Decl."), ¶ 7, Exh. 2: Request for Judicial
16 Notice ("RJN"), Exh. B. Petitioners therefore could have filed their Petition and Application
17 sooner, and their delay further bars them from obtaining any writ relief now.

18 Petitioner is also not entitled to the issuance of any writ of mandate as to the County
19 Registrar because the County Registrar is not the elections official for the City of Long Beach
20 ("City") and took no part in reviewing or accepting the ballot question at issue; it is Respondent
21 Monique De La Garza, in her official capacity as the City Clerk for the City of Long Beach ("City
22 Clerk") who is the City's elections official. The County Registrar assumes no position as to the
23 merits of the underlying dispute concerning the City's Measure RW, but maintains that he has
24 complied with his ministerial duties at all relevant times.

25 **II. STATEMENT OF RELEVANT FACTS**

26 **A. The City's Measure RW**

27 On October 26, 2023, the Long Beach City Council ("City Council") approved, by
28 Resolution No. 23-0169 ("Resolution"), a municipal ballot measure to increase minimum wage for

1 certain hotel workers in the City, known as "Measure RW," to be submitted to qualified voters of
2 the City for approval at the City's March 5, 2024 Municipal Primary Election ("City's Election").
3 Petition, Exh. H, p. 3 at Sec. 2. The City Council also approved the form of the ballot question for
4 Measure RW to appear on the ballot for the City's Election. Petition, Exh. H, p. 3 at Sec. 3. In the
5 same Resolution, the City Council approved the City's Election to be consolidated with the
6 County's March 5, 2024 Statewide Presidential Primary Election ("Election"), for which the
7 County Registrar is conducting as the County's elections official. The Resolution also requests the
8 County of Los Angeles Board of Supervisors' consent to the consolidation of the City's Election,
9 and the County Registrar to provide certain election support services for the City's Election,
10 including the printing, mailing and canvassing of ballots, with the City Clerk to receive the
11 canvass of City's Election results from the County Registrar and certify the City's Election results
12 to the City Council after the Election. Petition, Exh. H., p. 4-5 at Sec. 4. The Resolution further
13 provides that the City Clerk shall transmit a copy of Measure RW to the City Attorney, and the
14 City Attorney shall prepare an impartial analysis for Measure RW. Petition, Exh. H, p. 6 at Sec.
15 5.D.

16 **B. Ballot Printing Deadlines that Must Be Met to Avoid Substantial Interference**
17 **with the Conduct of the Election.**

18 In order for the County Registrar to prepare, print and mail vote by mail ballots for the
19 Election pursuant to statutory deadlines, as well as to conduct the Election in a timely and orderly
20 manner, any changes, additions, or deletions to the ballot measure text to appear on ballots,
21 including the ballot question for Measure RW, must be submitted to the County Registrar by no
22 later than December 28, 2023. See Declaration of Aman Bhullar ("Bhullar Decl.") attached
23 hereto, ¶ 2.A. December 28, 2023 is the last day to amend, add or delete to any measure text,
24 candidate names or candidate ballot designations because those are the items contained on the
25 ballots to be mailed to military service voters and overseas voters earlier in the Election timeline,
26 pursuant to Elec. Code § 3114 and 52 U.S.C. § 20302, unlike information contained in the Official
27 Sample Ballot Booklets, such as impartial analysis, arguments for or against a measure, and
28 candidate statements, which can be mailed shortly after and have a later deadline of January 5,

1 2024 for any changes, additions or deletions. Bhullar Decl., ¶ 2.B. December 28, 2023 is also the
2 date the California Secretary of State issued its certified list of candidates, allowing for the
3 finalization of ballots for state contests. *See* Elec. Code § 8120.

4 For the Election, the County Registrar is charged with preparing, editing and finalizing the
5 layout for all ballots, including ballots for jurisdictions that have consolidated their elections with
6 the County and requested ballot printing and mailing services from the County Registrar. This
7 includes proofing and reproofing a total for 120,910 ballot styles for 425 active contests in the
8 Election, translating ballots and ballot materials into 19 different languages, communicating with
9 print vendors to make any changes or correct any errors in the ballots, printing and transporting
10 over 5.6 million vote by mail ballots from out of state to the County for mailing, and mailing an
11 estimated total of 5,681,280 vote by mail ballots to all registered voters, including to military
12 service voters and overseas voters in the timeframe legally mandated by the MOVE Act (52
13 U.S.C. § 20302) and Elec. Code § 3114. Bhullar Decl., ¶¶ 2, 4-10, 14. Because the County's
14 system rebuilds the ballot layout each time a change is made to the layout of one ballot style, any
15 change to one ballot style requires manually reproofing ballot styles and related ballot materials to
16 ensure the accuracy and integrity of the election. Bhullar Decl., ¶¶ 6-7. Due to the size,
17 population, diversity and complexity of the election jurisdiction of the County, each of the
18 aforementioned activities require immense resources, effort and time to complete, and require
19 coordination with multiple vendors and the United States Postal Service, without room for delay in
20 the already compressed timeline.

21 **III. LAW AND ARGUMENT**

22 **A. Legal Standard and Burden of Proof**

23 No writ of mandate under California Code of Civil Procedure ("C.C.P.") §1085 will issue
24 unless the petitioner can demonstrate an abuse of discretion or respondent's failure to perform a
25 nondiscretionary duty to act. Petitioner bears the burden of showing an abuse of discretion or that
26 there was a mandatory duty to act in a particular way. *Arnold v. Williams* (1963) 222 Cal.App.2d
27 193, 196-197; *Taliaferro v. Locke* (1960) 182 Cal.App.2d 752, 755. The judicial inquiry centers
28 on "whether the public entity's action was arbitrary, capricious or entirely without evidentiary

1 support, and whether it failed to conform to procedures required by law." *People for Ethical*
2 *Operation of Prosecutors & L. Enft v. Spitzer* (2020) 53 Cal.App.5th 391, 407. "The scope of
3 review is limited, out of deference to the agency's authority and presumed expertise: 'The court
4 may not reweigh the evidence or substitute its judgment for that of the agency.'" *Stone v. Regents*
5 *of Univ. of California* (1999) 77 Cal.App.4th 736, 745.

6 Elec. Code § 13314 provides that any elector may seek a writ of mandate alleging that an
7 error or omission has occurred, or is about to occur, in the placing of any name on, or in the
8 printing of, a ballot, county voter information guide, state voter information guide, or other official
9 matter, or that any neglect of duty has occurred, or is about to occur. Specifically, Elec. Code
10 § 13314(a)(2) states that the writ of mandate shall issue only upon proof of both of the following:
11 (A) that the error, omission, or neglect is in violation of this code or the Constitution, and (B) that
12 *issuance of the writ will not substantially interfere with the conduct of the election.* Elec. Code
13 § 13314(a)(2) (emphasis added); *Mann v. Superior Court* (1986) 181 Cal.App.3d 372. Elec. Code
14 § 9295(b)(2) also provides, "[a] peremptory writ of mandate or an injunction shall be issued only
15 upon *clear and convincing proof that the material in question is false, misleading or inconsistent*
16 *with this chapter, and that issuance of the writ or injunction will not substantially interfere with*
17 *the printing or distribution of official election materials* as provided by law."¹ Elec. Code § 9295
18 (emphasis added).

19 As set forth herein, Petitioners are also not entitled to writ issuance under Elec. Code
20 §§ 9295 and 13314 because any writ relief at this late juncture would result in substantial
21 interference with the printing and mailing of ballots and with the conduct of the Election.
22 Petitioners also failed to meet the requisite showing under C.C.P. § 1085 as to the County
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26 ¹ Petitioners erroneously cite to Elec. Code § 9204 as legal authority for their writ challenge to the
27 ballot question, presumably misinterpreting Elec. Code § 9204 as the governing statute for seeking
28 a writ challenge to ballot measure text or the form of the ballot question, when the governing
statute is Elec. Code § 9295. Elec. Code § 9204 governs writ challenges against a ballot title and
summary prepared by the city attorney following request from a proponent on a municipal
initiative petition. Here, the Measure RW is not an initiative petition and was approved to be
placed on the ballot for the City's Election by the City Council. Accordingly, Elec. Code § 9204
does not apply.

1 Registrar because Petitioners have not and cannot demonstrate any abuse of discretion or failure to
2 perform a non-discretionary duty on the part of the County Registrar.

3 **B. Relief at this Late Date Would Result in Substantial Interference With the**
4 **Printing and Mailing of Ballots and the Conduct of the Election.**

5 In this case, the last day to make any change, addition, or deletion to any ballot text or
6 ballot question without substantially interfering with the Election was December 28, 2023.
7 Bhullar Decl., ¶ 2. Insofar as Petitioners seek to change, add or delete from the ballot question of
8 Measure RW, the deadline to do so has already expired, leaving no time to conduct the hearing or
9 to brief the matter on an expedited briefing schedule. Granting ex parte relief or any relief at all to
10 Petitioners now will result in substantial interference with the printing and mailing of ballots and
11 with the timely and orderly conduct of the Election. This basis alone warrants the denial of any
12 relief for Petitioners.

13 **C. Petitioners Have Acted with Unreasonable Delay, and Relief Should be Denied**
14 **on Account of Laches**

15 Moreover, Petitioners are not entitled to any relief based on the ground of laches. "It is
16 well settled that laches is established by showing unreasonable delay in bringing the action and
17 prejudice to defendant resulting from this delay." *See Finne v. Town of Tiburon* (1988) 199
18 Cal.App.3d 1, 14 (court found opponents of ballot measure guilty of laches in denying injunctive
19 relief); *see also Johnson v. City of Loma Linda* (2000) 24 Cal.4th 61, 68-69; *Vela v. Huberty*
20 (1934) 1 Cal.2d.466, 467-468 (writ denied for bringing writ petition at the eleventh hour). Based
21 on the record, Petitioners became informed of underlying issues regarding Measure RW since as
22 early as October 2023 when the City Council approved the Resolution and form of the ballot
23 question for Measure RW, and certainly by no later than early December 2023 when Ian Patton,
24 Executive Director of Petitioner Long Beach Reform Coalition ("LBRC"), engaged in
25 correspondence with Real Party in Interest Dawn A. McIntosh, in her official capacity as the City
26 Attorney for the City of Long Beach ("City Attorney"), regarding LBRC's assertions that Measure
27 RW's ballot question contains language that is false or misleading to voters in the City. Petition,
28 ¶¶ 38-39, Exh. A, H. The last of these communications between LBRC and the City Attorney was

1 dated December 16, 2023. Nevertheless, Petitioners chose not to file the Petition until nearly two
2 weeks later on December 28, 2023 (the last day to make any changes to the ballot measure text),
3 and even after filing the Petition, Petitioners scheduled the ex parte Application to be heard the
4 following week on January 3, 2024. Petitioners' lack of diligence in bringing this writ challenge
5 and Application is unreasonable and unjustified, especially given the time-sensitive nature of pre-
6 election writ challenges and the fact that Petitioner LBRC has communicated extensively with the
7 County Registrar on other matters in the past and knew how to contact the County Registrar if it
8 wanted to inquire about ballot printing deadlines for the Election but did not do so. This
9 unreasonable delay serves as an additional ground for denying writ relief to Petitioners.

10 **D. The County Registrar is Not the City's Elections Official and Did Not Fail to**
11 **Comply with Any Ministerial Duty.**

12 In municipal elections, the city clerk serves as the city elections official and performs
13 various key election functions even when some of the election support services are rendered by a
14 county registrar of voters. Here, the City Clerk is the City's elections official for the City's
15 Election and for accepting, reviewing and transmitting the ballot measure text and question of
16 Measure RW to the City Attorney for preparation of an impartial analysis. This is set forth in the
17 City's City Charter and Municipal Code, as well as in the California Elections Code. *See* Long
18 Beach City Charter § 401(f) (City Clerk to conduct all City elections); Long Beach Municipal
19 Code §§ 1.21.010 (canvass of each municipal election to be made by City Clerk, certification of
20 election results by City Clerk); 1.21.040 (ballot designation changes to be submitted to City
21 Clerk); 1.25.020 (City Clerk to receive nominating petitions and filing fees); 1.21.050 (candidate
22 statements to be filed with City Clerk); *see also* Elec. Code §§ 9280, 9282, 9285, 9286, 9287,
23 10224, 10227, 10240; Writ Petition, Exh. H, p. 6-7 at Sec. 5.D. Because the County Registrar is
24 not the City's elections official for the City's Election, and the County Registrar took no part in
25 reviewing or accepting the ballot measure and ballot question for Measure RW, the County
26 Registrar did not fail to comply with any duty pertaining to the City's Election or Measure RW.
27 As the County's elections official for the County's Election, the County Registrar maintains he has
28 fully complied with his ministerial duties under the law.

1 **IV. CONCLUSION**

2 Based on the foregoing, the County Registrar respectfully requests that the Court deny any
3 relief sought in the Application or any other relief based on the Petition, because: (i) granting
4 relief would result in substantial interference with the printing and mailing of ballots and the
5 conduct of the March 5, 2024 Statewide Presidential Primary Election; (ii) Petitioners are barred
6 from relief on grounds of their unreasonable delay and laches; and (iii) Petitioners are not entitled
7 to any relief against the County Registrar because the County Registrar is not the City's elections
8 official for the City's March 5, 2024 Municipal Primary Election and in any event, the County
9 Registrar did not fail to comply with any ministerial duty under law.

10

11 DATED: January 2, 2024

Respectfully submitted,

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DAWYN R. HARRISON
County Counsel

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By



EVA W. CHU
Senior Deputy County Counsel

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Attorneys for Respondent Dean C. Logan, in his
official capacity as the County of Los Angeles
Registrar-Recorder/County Clerk

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DECLARATION OF AMAN BHULLAR

I, Aman Bhullar, declare as follows:

1. I am the Assistant Registrar-Recorder of the Information Technology Bureau of the County of Los Angeles Registrar-Recorder/County Clerk (hereinafter "Registrar"). In such capacity, I am responsible for the configuration of election management and tally systems and the preparation of ballot materials for all federal, state, county, school district, and special district elections conducted by the Registrar. I have personal knowledge of the matters and facts set forth herein and, if called as a witness, could and would testify completely thereto.

Ballot Printing Deadlines

2. For the reasons set forth below in paragraphs 4 - 12, the printing deadlines for the March 5, 2024, Presidential Primary Election are as follows:

A. *December 28, 2023* - Last date to make changes, additions, or deletions to any measure text, ballot designation, or candidate name to appear on vote-by-mail and in-person voting ballots. Attached hereto as **Exhibit A** is a true and correct copy of the sample ballot designation and **Exhibit B**, sample measure text. This date is set based on the statutory dates for the Registrar to mail vote-by-mail ballots to military service voters and overseas voters under 52 U.S.C. section 20302 (formerly 42 U.S.C. 1973ff-1) ("MOVE Act") and California Elections Code ("Elec. Code") section 3114 as outlined in 2.D. below. Due to this statutory window, the information appearing on ballots must be finalized earlier and operate on an earlier timeline than the information appearing on Official Sample Ballot Booklets. Specific tasks involved with preparing, modifying, translating, reviewing, printing, and mailing ballots are further addressed in Paragraphs 7-12 below, and they further demonstrate why any changes, additions, and deletions to any measure text, ballot designation, or candidate name must be made by *December 28, 2023*.

B. *January 5, 2024* - Last date to change, add, or delete candidate statements or arguments to measure text or any other data/materials appearing in the Official Sample Ballot Booklet, except for items described in 2.A. Attached hereto as

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Exhibit C is a true and correct copy of a sample candidate statement to appear on the Official Sample Ballot Booklet.

C. *January 5, 2024* - Last and final day for the Registrar to authorize the print vendor to cast the printing plates required to print election materials described in 2B. above.

D. *January 5, 2024, to January 20, 2024* - The legal window for the Registrar to mail ballots to absent military service voters and overseas voters under the MOVE Act and Elec. Code section 3114. Failure to meet this deadline subjects the County of Los Angeles ("County") to adverse action by the U.S. Department of Justice. Further, the Registrar is required to notify the Secretary of State of compliance with this timeframe.

3. The above deadlines are based on the County's complex voting system, populous and diverse voter population, and legally mandated duties described below.

Ballot Configuration and Layout

4. The March 5, 2024, Presidential Primary Election ("Election") will consist of approximately **425** active contests and approximately **120,910** ballot styles in 19 different languages, including English. A ballot style is the unique combination of office contests, measures, and candidates appearing on the ballot for a given area, based on the boundaries of jurisdictions active in the election.

5. For the Election, the Registrar will be using the tally system from its pioneered voter-centered voting system called Voting Solutions for All People Tally System (VSAP). Vote-by-mail voters are provided with a full-face ballot that presents the candidates for all offices and ballot questions on a single face.¹

¹ Under Los Angeles County's prior InkaVote Plus voting system, the vote-by-mail ballots were not "single face" in that the vote-by-mail ballots consisted of two-parts, a booklet listing the candidates for offices and ballot questions, and a ballot card for the voter to make his or her selection based on the booklet accompanying the ballot card.

1 6. Ballots and ballot styles are different depending on the voter’s precinct. Ballot
2 styles are also integrated which means that candidates or measure text may share vote positions as
3 the layout of the office contests, measures, and candidates change from one ballot style to the next.
4 The voting system’s complex vote tabulating program interprets each vote mark and, depending
5 on the ballot style, attributes each voter-marked response to the correct candidate thereby enabling
6 the Registrar to electronically read and tabulate the results of the voting.

7 7. To change the layout of one ballot style, the program rebuilds the layout for all the
8 ballot styles in the election. For this reason, every time a change is made to a candidate, office
9 contest, and/or measure in the ballot configuration database, the Registrar must manually reproof
10 the ballot styles and related ballot information material to ensure the accuracy and integrity of the
11 election. This is necessary because, as in all computer programs and data structures, there is
12 always a risk of introducing an inadvertent, unintended, and undetected change causing an error in
13 the data. If a change is required, it necessitates re-entering contests and candidates, rerunning the
14 computerized ballot layout process, and manually reproofing the entire ballot layout. This tedious
15 and time-consuming process cannot be accelerated by having more staff. Once the established
16 deadline has passed, there would be insufficient time to revisit and redo the ballot layout without
17 jeopardizing the administration and integrity of the election.

18 **Translation Services**

19 8. In addition to the complex ballot styles, election materials are mandated by the
20 Federal Voting Rights Act of 1965 and Elections Code section 14201 to be translated from
21 English into eighteen languages. These include *Armenian, Bengali, Burmese, Chinese, Farsi,*
22 *Gujarati, Hindi, Indonesian, Japanese, Khmer, Korean, Mongolian, Russian, Spanish, Tagalog,*
23 *Telugu, Thai and Vietnamese.* Once the vote-by-mail ballots are finalized each must be translated
24 and verified for accuracy before printing and mailing to voters.

25 **Deadlines**

26 9. Thursday, **December 28, 2023**, is the final date to make changes, additions, or
27 deletions to any measure text, ballot designation, or candidate names due to the transmission of all
28 of the materials that will appear on the vote-by-mail ballots to the out of state ballot print vendor.

1 During this time the Registrar and the ballot print vendor must prepare, edit, translate, and finalize
2 the layout for the ballot, which is an integrated file that cannot be edited in a piece-meal fashion,
3 and also format and proof the **120,910** ballot styles in 19 different languages before vote-by-mail
4 ballots can be printed. The ballots for military service and overseas voters are generated before the
5 statutory window for mailing starting on **January 5, 2024**. The remaining vote-by-mail ballots
6 are produced and then transported from out of state to the County in advance of mailing to all
7 other voters.

8 10. The processing and formatting of vote-by-mail ballots must be finalized for mailing
9 to absent military services voters and overseas voters beginning on **January 5, 2024**, under the
10 MOVE Act, and Elections Code (52 U.S.C. section 20302; Elec. Code section 3114.)

11 11. The aforementioned timeframe is very tight because the Registrar cannot finalize
12 materials for the ballot until the public examination period has ended on **January 4, 2024**, and
13 until the City Clerk Offices issue the Certified Listings of Candidates on **December 15, 2023**,
14 which the Registrar uses to cross-check its list of candidates to finalize the ballot. (Election Code
15 13313.)

16 12. Friday, **January 5, 2024**, is the final date to make changes, additions, or deletions
17 to any candidate statements or arguments to measure text or any other data/materials appearing in
18 the Official Sample Ballot Booklet. **January 5, 2024**, is also the date the Registrar will authorize
19 the print vendor to cast the printing plates required to print the election materials appearing in the
20 Official Sample Ballot Booklet. This date is set with due and reasonable consideration given the
21 time needed for the Registrar and the Registrar's contracted vendors to complete all of the tasks
22 and activities that must occur to prepare (including editing and translating all election materials)
23 for the printing and mailing of Official Sample Ballot Booklets to all registered voters in the
24 jurisdictions ahead of the Election.

25 13. These deadlines are set with voters in mind, to allow parties as much time as
26 possible to seek a writ of mandate while allowing the Registrar sufficient time to carry out his
27 duties.

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Impact of COVID-19 Pandemic

14. In response to public health concerns related to COVID-19 in 2020, the Los Angeles County Board of Supervisors approved a motion on April 28, 2020, adopting the provisions of the Voter's Choice Act (Elections Code section 4005 and 4007(c), thereby accelerating provisions of the Voter's Choice Act for the Registrar to mail a vote by mail ballot to every registered voter in all elections starting with the November 3, 2020, General Election. Thus, in addition to all of the foregoing tasks and activities that must occur to prepare, print, and mail ballots, the Registrar has increased pre-election responsibilities and needs adequate time to validate and process the vote-by-mail ballots to ensure accurate vote-by-mail ballots and Official Sample Ballot Booklets are mailed to every active registered voter for the Election. The Registrar estimates a total of at least **5,681,180** vote-by-mail ballots, and Official Sample Ballot Booklets will be printed and mailed to active registered voters in the Election.

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

Executed on September 21, 2023, at Norwalk, California



Aman Bhullar

EXHIBIT "A"

Exhibit A



Sample Ballot

Assembly District 54
Special Primary Election
May 18, 2021

Instructions to voters: Marking your ballot



Do this



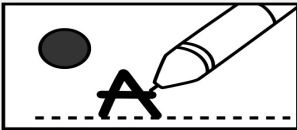
Not this



Not this

- Use only black or blue ink pen to mark your choice on your ballot.
- Fill in the circle to the left of your choice.
- Make one selection.

Write-In Candidates



- A voter is entitled to cast a vote for a qualified write-in candidate for any party-nominated, voter-nominated or nonpartisan office by writing, on the write-in portion of the ballot, the name of the qualified candidate.
- To add a candidate, fill in the circle to the left of "Write-in Candidate" and write the name on the dotted line.
- A list of qualified write-in candidates is available eleven days before the election at lavote.net.
- Do not write-in a candidate whose name already appears on the ballot.

Voter Nominated Offices

All voters, regardless of the party preference they disclosed upon registration, or refusal to disclose a party preference, may vote for any candidate for a voter-nominated office. The party preference, if any, designated by a candidate for a voter-nominated office is selected by the candidate and is shown for the information of the voters only. It does not imply that the candidate is nominated or endorsed by the party or that the party approves of the candidate.

CITY/LOCAL

MEMBER OF THE STATE ASSEMBLY, 54th District (Unexpired term ending December 5, 2022)

Vote For **ONE**

- SAMUEL ROBERT MORALES**
Party Preference: Democratic
Financial Advisor/Entrepreneur
- CHERYL C. TURNER**
Party Preference: Democratic
Attorney/State Commissioner
- BERNARD SENTER**
Party Preference: None
Retail Grocery Worker
- DALLAS FOWLER**
Party Preference: Democratic
Businesswoman/Non-Profit
Executive
- ISAAC BRYAN**
Party Preference: Democratic
Educator/Community Organizer
- HEATHER HUTT**
Party Preference: Democratic
Senator's State Director
- Write-In Candidate

End of Ballot

EXHIBIT "B"

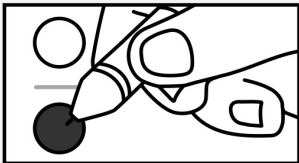
Exhibit B



Sample Ballot

City of Commerce
Special Municipal Election
November 2, 2021

Instructions to voters: Marking your ballot



Do this



Not this



Not this

- Use only black or blue ink pen to mark your choice on your ballot.
- Fill in the circle to the left of your choice.
- Make one selection.

CITY/LOCAL

PS CITY OF COMMERCE SPECIAL MUNICIPAL ELECTION - MEASURE PS

Vote YES or NO

Commerce Special Parcel Tax on Industrial Property. To protect vital public safety emergency services, including police, paramedic and fire protection to maintain 9-1-1 response times and the number of firefighters and police officers, shall the City of Commerce enact a parcel tax on industrial property at a maximum rate of \$0.3321 per square foot providing approximately \$12,000,000 annually until ended by voters; with committee oversight? All funds will remain in Commerce.

YES on Measure PS

NO on Measure PS

End of Ballot

EXHIBIT "C"



Candidate Statements & Measures

**STATEMENT OF R. MICHAEL DUTTON
CANDIDATE FOR GOVERNING BOARD
MEMBER,
Trustee Area No. 1
ANTELOPE VALLEY COMMUNITY COLLEGE
DISTRICT**

Age: 74

Occupation: Retired Educator

I, R. Michael Dutton, am running for the Trustee position area #1 of the Antelope Valley Community College District. My goal is to help chart the course for a vigorous, relevant and valuable experience for community college students. I would appreciate your support and your VOTE.

As a Viet Nam Veteran, I believe in service to my community. I have lived in the Antelope Valley since 1974, dedicating myself to education as a teacher, principal and founding principal of SOAR High School on the Antelope Valley College campus. I have taught elementary, high school and college level as well as serving as school board member in the Keppel District for 26 years.

I remain active and involved as a retired educator serving 5 years on the Antelope Valley Joint Union High School Board. Currently, I serve on the Juvenile Justice Coordinating Council for Los Angeles County, and I am also an instructor for the California School Boards Association.

I am most interested in your support and your VOTE. Thank You!

**DECLARACIÓN DE R. MICHAEL
DUTTON
CANDIDATO PARA MIEMBRO DE LA JUNTA
GUBERNATIVA,
Área Sindical N.º 1
DISTRITO DE COLEGIOS COMUNITARIOS DE
ANTELOPE VALLEY**

Edad: 74

Ocupación: Educador Jubilado

Yo, R. Michael Dutton, estoy postulando para el cargo en el Área Sindical N.º1 del Distrito de Colegios Comunitarios de Antelope Valley. Mi meta consiste en ayudar a cambiar el rumbo para que los estudiantes de los colegios comunitarios tengan una experiencia vigorosa, relevante y valiosa. Apreciaría su apoyo y su VOTO.

Como Veterano de Vietnam, creo en el servicio a la comunidad. He vivido en Antelope Valley desde 1974, dedicándome a la educación como maestro, director y director fundador de la Escuela Secundaria SOAR en el campus de la Escuela Antelope Valley. He enseñado en los niveles de primaria, secundaria y superior, igualmente he sido miembro de la junta escolar en el Distrito de Keppel por 26 años.

Sigo estando activo e involucrado como educador jubilado sirviendo 5 años en la Junta Escolar de Antelope Valley Joint Union High. Actualmente, sirvo en el Consejo Coordinador de Justicia Juvenil para el Condado de Los Angeles, y además soy instructor para la Asociación de Juntas Escolares de California.

Estoy muy interesado en su apoyo y su VOTO. ¡Gracias!

PROOF OF SERVICE
Case No. 23LBCP00476

STATE OF CALIFORNIA, County of Los Angeles:

Lilit Piliposyan states: I am employed in the County of Los Angeles, State of California, over the age of eighteen years and not a party to the within action. My business address is 648 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012-2713

That on January 2, 2024, I served the attached

RESPONDENT DEAN LOGAN'S OPPOSITION TO EX PARTE APPLICATION FOR PEREMPTORY WRIT OF MANDATE, OR TO SHORTEN TIME FOR HEARING ON PEREMPTORY WRIT OF MANDATE; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF AMAN BHULLAR IN SUPPORT THEREOF

upon Interested Party(ies) by placing the original a true copy thereof enclosed in a sealed envelope addressed as follows as stated on the attached service list:

By United States mail. I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses on the attached service list (specify one):

- (1) deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.
- (2) placed the envelope for collection and mailing, following ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California:

By electronic service. Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed on the service list.

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

Executed on January 2, 2024, at Los Angeles, California.

Lilit Piliposyan
(NAME OF DECLARANT)

/s/Lilit Piliposyan
(SIGNATURE OF DECLARANT)

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SERVICE LIST

<p>LEX REX INSTITUTE 444 W. Ocean Blvd., Suite 1403 Long Beach, CA 90802 Alexander H. Haberbush AHaberbush@LexRex.org <i>Attorneys for Petitioners Long Beach Reform Coalition and Corliss Lee</i></p>	<p>BEST BEST & KRIEGER LLP 2855 E. Guasti Rd., Suite 400 Ontario, CA 91761 William J. Priest william.priest@bbklaw.com <i>Attorneys for Respondents Monique De La Gaza, in her official capacity as the City Clerk of the City of Long Beach and Dawn A. McIntosh, in her official capacity as the City Attorney for the City of Long Beach</i></p>
<p>MONIQUE DE LA GARZA 411 W. Ocean Blvd. Long Beach, CA 90802 Monique.DeLaGarza@longbeach.gov <i>Respondent Monique De La Garza, in her official capacity as the City Clerk of the City of Long Beach</i></p>	<p>DAWN A. MCINTOSH 411 W. Ocean Blvd. Long Beach, CA 90802 Dawn.mcintosh@longbeach.gov <i>Respondent Dawn A. McIntosh, in her official capacity as the City Attorney of the City of Long Beach</i></p>