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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF LOS ANGELES

15 COMMITTEE TO SUPPORT THE RECALL
OF DISTRICT ATTORNEY GEORGE
16 GASCON,

17 Plaintiff and Petitioner,

18 vs.

19 DEAN C. LOGAN, in his official capacity as
20 the Los Angeles County Registrar-
Recorder/County Clerk; OFFICE OF THE
21 LOS ANGELES COUNTY REGISTRAR-
RECORDER/COUNTY CLERK; and DOES 1
22 through 25, inclusive,

23 Defendants and Respondents.
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Case No. 22STCP03795

**VERIFIED PETITION FOR WRIT OF
MANDATE AND COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

**[Election and Public Records Matter –
Priority Requested]**

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

3 INTRODUCTION

4 1. This lawsuit implicates two fundamental and intersecting rights: the right to recall
5 public officials and the right to government transparency in the handling of a recall petition. As
6 the Constitution explains, “[r]ecall is the power of the electors to remove an elective officer,” Cal.
7 Const. Art. II § 13, and this power is an important tool for the people to demand accountability
8 from public officials. For just this reason, California law does not give public officials
9 unreviewable discretion to determine whether the conditions for a recall have been satisfied. To
10 the contrary, California law specifically guarantees the proponents of a recall the right to review
11 whether public officials have properly rejected a recall petition. Without such review, public
12 officials would effectively have the ability to thwart the very recall mechanism meant to ensure
13 the accountability of public officials. This case presents the question whether that legal review
14 right is meaningful or hollow.

15 2. In July 2022, Plaintiff/Petitioner Committee to Support the Recall of District
16 Attorney George Gascón (“**Committee**”) submitted to Defendants/Respondents Dean C. Logan
17 and the Office of the Los Angeles County Registrar-Recorder/County Clerk (collectively
18 “**Registrar**”) a petition to recall sitting Los Angeles County District Attorney George Gascón,
19 supported by 715,833 signatures—148,976 more than the 566,857 signatures that the Registrar
20 informed the Committee were necessary to trigger a recall election. According to the Registrar, it
21 was the largest recall petition that the Registrar had ever processed.

22 3. On August 15, 2022, the Registrar certified the petition as insufficient, finding a
23 remarkable 195,758 supporting signatures—just over 27% of the total submitted—invalid.
24 Determined to uncover how and why so many signatures were rejected, the Committee informed
25 the Registrar that it intended to exercise its statutory right to review the recall petition under
26 Elections Code section 11301 and Government Code section 6253.5. The Registrar promised the
27 Committee that the review process would include access to “the voter record data or information
28 that led to the disqualification of [each] signature”; the Registrar would “review and respond to”

1 “any questions in connection with the examination of the Petition to determine which signatures
2 were disqualified and the reasons therefor”; and the Registrar would permit the review to take
3 place at its offices “during normal business hours.”

4 4. Four weeks into the review process, the Registrar has broken each one of these
5 promises. The Registrar has instead erected a series of barriers that render the review process all
6 but meaningless.

7 5. First, the Registrar has refused to provide the Committee with sufficient access to
8 the records its needs to adequately evaluate each signature’s rejection, or has otherwise provided
9 the Committee with records in a form that has made it incredibly arduous to conduct the signature
10 review. Contrary to the Registrar’s assertions, the review process is not limited to the Registrar
11 spoon-feeding the Committee only those records that support the Registrar’s rejection decision,
12 while suppressing the data that might demonstrate that a rejection was improper. Indeed, the
13 review process exists precisely to assure the petition’s proponents, and by extension the public at
14 large, that the petition was not improperly rejected by elections officials. That purpose is
15 eviscerated unless the Committee has access to the voter record data or information that led to the
16 disqualification of a signature in order to determine *for itself* whether a signature was properly
17 rejected. The Committee is entitled to a writ of mandate under both the Public Records Act and
18 Code of Civil Procedure section 1085 to enforce its right to a timely and meaningful review of
19 these records.

20 6. Second, the Registrar has unreasonably limited the manner in which the review
21 can be conducted. The Registrar has limited the Committee to reviewing signatures in-person at
22 its offices only three days per week; limited the Committee to 14 representatives per day; and
23 limited the Committee to seven computer workstations each operated by one staff person. Under
24 these conditions, the Committee has been able to review only 1,200 signatures per week. With
25 over 195,000 invalidated signatures—at least 107,000 of which must be reviewed on-site—it will
26 take the Committee over eighteen months to complete its review. This is plainly unreasonable.
27 Indeed, the Registrar is statutorily required to destroy the recall petition eight months after the
28 certification of insufficiency absent pending litigation—which is ten months before the Committee

could even plausibly complete its review under current conditions. *See* Elec. Code § 17400. The Committee is entitled to a writ of mandate and other equitable relief to enforce its right to a timely and meaningful petition review process.

7. The Committee's right to records and a timely inspection process is all the more urgent given the number of incorrectly rejected signatures it has uncovered in just the past four weeks. The Committee has found signatures marked as valid on the petition, yet marked as invalid in the Registrar's database; signatures invalidated as not belonging to a registered voter, even though the Committee was easily able to locate the voter in the voter database; signatures invalidated as duplicates without the Registrar counting at least one of the alleged duplicates; and more. The overwhelming number of errors call into question the Registrar's finding of insufficiency, and thus it is critical for the Committee to conduct a timely and complete review of the invalidated signatures for any potential challenge to the Registrar's finding.

8. Rejecting valid signatures disenfranchises voters and undermines the people’s constitutional right to recall elected public officials. The Committee, as the official proponent of the recall petition, has a right to determine for itself if this is what happened, and it has a right to make that determination within a reasonable period of time after the Registrar’s finding of insufficiency. Nothing corrodes a democracy more than the public’s distrust in the electoral process. The only way the Committee can determine if the petition was properly rejected is if it has access to the same voter record data and information as the Registrar and is given comparable access to resources to undertake its review. This Court should immediately grant that relief.

THE PARTIES

9. Plaintiff and Petitioner Committee to Support the Recall of District Attorney George Gascón is a non-partisan organization that is the official proponent of the petition to recall District Attorney George Gascón, as defined in Elections Code section 343.

10. Defendant and Respondent Dean C. Logan is the Los Angeles County Registrar-Recorder/County Clerk. Respondent Logan is the public official and officer responsible for reviewing and certifying recall petitions in Los Angeles County under the California Elections Code, the Los Angeles County Charter, and the California Constitution, including the petition to

recall Los Angeles County District Attorney George Gascón.

11. Defendant and Respondent Office of the Los Angeles County Registrar-Recorder/County Clerk is a department within the County of Los Angeles, and is the department responsible for reviewing and certifying recall petitions in Los Angeles County under the California Elections Code, the Los Angeles County Charter, and the California Constitution, including the petition to recall Los Angeles County District Attorney George Gascón.

12. At all relevant times, DOES 1 through 25 were and are individuals, business entities, public entities, and/or public officials that were and are responsible for the conduct complained of herein. The identities and particular capacities of DOES 1 through 25 are presently unknown to Plaintiff/Petitioner. Plaintiff/Petitioner therefore sues these defendants by fictitious names. Plaintiff/Petitioner is informed and believes, and therefore alleges, that DOES 1 through 25 were responsible in some manner for the occurrences herein alleged, and that Plaintiff/Petitioner's injuries as herein alleged were proximately caused by said defendants. Plaintiff/Petitioner will substitute the true names and capacities of DOES 1 through 25 when ascertained.

JURISDICTION AND VENUE

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

FACTUAL ALLEGATIONS

I. Petition to Recall District Attorney George Gascón

14. George Gascón was elected as the Los Angeles County District Attorney in November 2020, and took office on December 8, 2020. Since then, Gascón has introduced controversial prosecutorial policies intended to substantially reduce charges brought against, and prison sentences imposed on, criminal defendants. As violent crime rates in Los Angeles County

1 began to soar, many Los Angeles County residents grew frustrated with what they saw as
2 Gascón’s lack of concern for the victims of crime and the safety of the law-abiding public.

3 15. On January 27, 2022, the Committee received approval from the Registrar to
4 circulate a petition to recall Gascón. Attached as **Exhibit 1** is a true and correct copy of that letter
5 with enclosures. With the help of hundreds of volunteers, paid signature gatherers, and donor
6 contributions, the Committee collected an astounding 715,833 signatures in support of the recall
7 petition—148,976 more than the 566,857 signatures that the Registrar informed the Committee
8 was needed to trigger a recall election. On July 6, 2022, the Committee submitted the recall
9 petition to the Registrar to verify the signatures, certify the sufficiency of the petition, and order a
10 recall election. Personnel from the Registrar’s office remarked to Committee representatives that
11 this recall petition was the largest petition it had ever processed.

12 16. On July 9, 2022, the Registrar issued a press release verifying the total number of
13 raw signatures submitted. Attached as **Exhibit 2** is a true and correct copy of the press release.
14 After initially reviewing a 5% sample of the signatures submitted pursuant to Elections Code
15 section 11225, the Registrar proceeded to conduct a full review of all petition signatures.
16 Emmanuel Anyiwo, a Division Manager in the Registrar’s Voter Records Division, confirmed to a
17 Committee representative that he was supervising the signature verification of the recall petition.
18 Mr. Anyiwo further shared that, given the sheer volume of signatures submitted, the Registrar had
19 to employ “close to 400” workers to conduct the processing and signature verification of the recall
20 petition, comprised of permanent, recurrent, and temporary staff hired through staffing agencies.

21 **II. The Committee’s Review of the Recall Petition**

22 17. On August 15, 2022, the Registrar announced that it had found an astounding
23 195,783 petition signatures invalid, resulting in 46,807 fewer signatures than the Registrar stated
24 was needed to qualify the petition for a recall election. Attached as **Exhibit 3** is a true and correct
25 copy of the Registrar’s press release making that announcement. It therefore certified the petition
26 as insufficient. Each signature was rejected for one of sixteen potential reasons, with the most
27 common reasons for rejection as follows:

- 28 • Not Registered: 88,464

- 1 • Duplicate Signature: 43,593
- 2 • Different Address: 32,187
- 3 • Mismatch Signature: 9,490
- 4 • Cancelled: 7,344
- 5 • Out-of-County Address: 5,374
- 6 • Other: 9,331

7 18. “Other” includes ten further reasons for rejection, such as where the voter’s
8 information appeared to have been entered by the circulator (instead of the signer); the voter was a
9 minor at the time of signing; signatures appeared to be printed rather than signed; signatures on
10 the petition were missing; no address was listed on the petition; and others. Attached as **Exhibit 4**
11 is a true and correct copy of the breakdown of all rejection categories provided by the Registrar’s
12 office.

13 19. The Committee was stunned by the number of rejected signatures. On August 18,
14 2022, determined to uncover how and why so many signatures were rejected, the Committee
15 informed the Registrar that it intended to exercise its statutory right, under Elections Code section
16 11301 and Government Code section 6253.5, to examine the petition to assess “which signatures
17 were disqualified and the reasons therefor.” Attached as **Exhibit 5** is a true and correct copy of
18 the e-mail from the Committee to the Registrar. The following day, the Registrar responded and
19 stated that the scope of the review would be permitted as follows:

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

25 To the extent there are any questions in connection with the examination of the
26 Petition to determine which signatures were disqualified and the reasons therefor,
27 Proponent may submit these questions in writing to our office, and our office will
28 review and respond to the questions 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.

(Emphasis added.) Attached as **Exhibit 6** is a true and correct copy of this letter.

1 20. On August 29, 2022, despite promising that the Committee could review the
2 petition during “normal office hours,” the Registrar advised the Committee that it would limit the
3 signature review process as follows: (a) the Committee could examine petition signatures only
4 Tuesday through Thursday, from 9 A.M. to 4 P.M., at the Registrar’s office; (b) only 14 Committee
5 representatives would be permitted per day; (c) Committee representatives would be limited to
6 seven computer workstations; and (d) each computer workstation would be operated by one staff
7 person from the Registrar’s office. Although the Committee had substantial concerns with these
8 restrictions given the extremely large number of signatures that required review, the Committee
9 decided to make a good faith attempt to conduct the review process within these parameters.

10 21. On September 6, 2022, the Committee began the signature review process. This
11 process has been arduous, involving a review of the information provided by each petition signer,
12 pulling up the relevant voter’s information in the Registrar’s computer system (which the
13 Registrar permits only staff members to operate), comparing this to the limited voter information
14 contained in the Registrar’s computers systems, and evaluating whether the Registrar’s stated
15 reason for rejecting that particular signature is sound.

16 22. Despite the Registrar’s promise that the Committee would have access to “the voter
17 record data or information that led to the disqualification of the signature,” it quickly became
18 apparent the Registrar would not provide such access, including denying access to all voter
19 signatures on file, prior addresses of registered voters, and other crucial pieces of information
20 needed to determine a signature found invalid was actually valid. It took repeated requests and
21 demands, both in writing and orally, to obtain even the limited data that the Committee has been
22 able to obtain to date.

23 23. Moreover, despite the Registrar’s promise to “review and respond to” “any
24 questions in connection with the examination of the Petition to determine which signatures were
25 disqualified and the reasons therefor,” the Registrar started refusing to answer such questions
26 almost immediately after the inspection process began. Committee representatives would orally
27 ask questions of the Registrar’s staff members only to be informed that every question must be
28 submitted in writing. Despite the gross inefficiency in doing so, the Committee complied—yet the

1 Registrar has simply ignored the overwhelming majority of questions that the Committee has
2 submitted or issued blanket responses that the questions were beyond the scope of the examination
3 process. Attached as **Exhibit 7** is a true and correct copy of one such blanket response.

4 24. Even with these roadblocks, however, the Committee has found significant and
5 substantial errors in the Registrar’s review of the recall petition. This includes, but is not limited
6 to, the following:

- 7 • Signatures marked as “VS”—for “validated signature”—on the petition itself are
8 nonetheless marked as invalid in the Registrar’s computer system;
- 9 • Petition signatures were incorrectly invalidated as “printed” even though the
10 voter’s signature on file was itself printed. The Registrar was required to validate
11 such signatures. *See* Cal. Code Regs., tit. 2, § 20930(b)(1);
- 12 • Signatures were incorrectly invalidated as “non-matching” to the signature on file
13 for the voter, even though the signature was not found invalid by an initial reviewer
14 and two further election officials as required. *See* Cal. Code Regs., tit. 2, § 20960;
- 15 • Signatures were incorrectly invalidated as “non-matching” to the signature on file
16 for the voter, even though the Committee’s review showed sufficient similarities to
17 the signature on file. Because signatures can be rejected as “non-matching” only
18 where one initial reviewer and two further election officials “unanimously”
19 conclude “beyond a reasonable doubt” that there are “multiple, significant, and
20 obvious differing characteristics with all signatures in the voter’s registration
21 record,” Cal. Code Regs., tit. 2, § 20960, these signatures should have been
22 validated;
- 23 • Signatures were incorrectly invalidated as “not registered,” even though the
24 Committee was easily able to locate the voter in the voter database;
- 25 • Signatures were incorrectly invalidated as “duplicates” without the Registrar
26 counting at least one of the alleged duplicates.¹ Some of these invalidations are
27 particularly troubling because they appeared to require that the reviewer modify a
28 previously-validated signature in the computer system, changing it from “Valid” to
29 “Duplicate.” Committee representatives have also observed myriad instances
30 where incomplete entries were crossed out by the petition signer due to error and
31 then filled in correctly in the next entry below—only to have examiners wrongfully
32 reject *both* as duplicates.

25 25. To date, at least 39% of the signatures that the Committee has reviewed for reasons

27 ¹ Indeed, one of the Committee’s representatives, Marian Thompson, who had
28 inadvertently signed the petition twice, discovered during the review process that *both* of her
29 signatures were rejected as duplicates.

1 other than “not registered” were improperly rejected by the Registrar. This does not include entire
2 categories of signatures that may have been improperly rejected due to legal errors or other
3 systematic flaws in the validation process. Moreover, the Committee is informed and believes that
4 the voter rolls in Los Angeles County contain up to 500,000 inactive voters who should have been
5 removed from the list of registered voters, thus potentially inflating the number of signatures that
6 was actually required to qualify the recall petition by up to 50,000.

7 26. The Committee has found these errors despite the Registrar stymying the
8 Committee’s review in several critical ways. As an initial matter, the Registrar’s computer system
9 uses Runbeck’s EMS-DIMS Election Management System (“**DIMS**”) for voter registration,
10 election management, and petition management, and the EMS-DIMS petition management system
11 is called the Petition Signer Module. The DIMS system contains numerous abbreviations, codes,
12 dates, and other information that a person not versed in the system could not decipher—but which
13 is often needed to determine whether a voter’s signature was properly rejected. The Committee
14 representatives therefore asked the Registrar for training or other materials on the DIMS system to
15 enable them to effectively utilize that system and increase the speed of the petition review process.
16 The Registrar refused to provide these materials, forcing Committee representatives to rely on
17 conflicting oral explanations of this information provided by the Registrar’s staff members—
18 which could substantially affect the accuracy of the Committee’s review.

19 27. Furthermore, the Registrar has refused to provide the Committee with reasonable
20 access to data and records that are critical to its ability to timely evaluate the rejected signatures—
21 records that the Registrar not only had access to and used during their examination process, but
22 promised to provide to the Committee during its review. Other reports and data that the Registrar
23 has provided to the Committee has been provided in printed form only, not electronic form, which
24 does little to accelerate the review process. The following examples illustrate how the Registrar’s
25 data dissemination decisions are significantly hindering the review process:

26 a. **Voter Signatures.** The Registrar has given the Committee access to only
27 one sample of each voter’s signatures. But under current law, a petition signature may be rejected
28 only where the initial examiner and two further reviewers conclude beyond a reasonable doubt that

1 the submitted signature possesses “multiple, significant, and obvious differing characteristics with
2 *all signatures* in the voter’s registration record.” Cal. Code Regs., tit. 2, § 20960(i) (emphasis
3 added). Without access to all signatures in the voter’s registration record, the Committee cannot
4 determine whether this standard was met. The Registrar also has a mandatory duty to allow the
5 Committee to review a voter’s signature. *See* Elec. Code § 2194(c)(2).

6 b. **Duplicate Signatures.** Over 43,000 signatures were rejected as duplicate
7 signatures—*i.e.*, the same voter signed the petition more than once. Yet the Committee has found,
8 and continues to find, myriad instances where the Registrar rejected not just the duplicative
9 signature(s), but where it rejected *all* such voter’s signatures. To efficiently determine how many
10 such voters never had even one of their signatures counted, it would be a simple matter for the
11 Registrar to provide the Committee with an electronic list of signatures rejected as duplicates to
12 compare against a list of accepted signatures. Indeed, the Registrar is required to provide the
13 Committee with “all memoranda” indicating which voters signed the petition. Gov. Code
14 § 6253.5. Yet the Registrar refuses to provide the Committee with anything other than a printed
15 report of duplicate signatures, refuses to allow the Committee to remove that 1,700-plus-page
16 report from the examination room, and refuses to allow the Committee to mark it up in any
17 fashion.² This forces the Committee to write down every duplicate signature, review every
18 petition page with a duplicate signature, conduct a laborious comparison of every duplicate
19 signature, and take handwritten notes on each. This will take dozens of volunteer representatives
20 *months* to complete. If the Registrar provided the requested information in electronic form,
21 however, the Committee could easily determine—in a matter of minutes—which of these 43,000-
22 plus voters had no signatures counted at all.

23 c. **Different Address.** Over 32,000 signatures were rejected because the
24 address identified on the petition differed from the voter’s registered address. However, the
25 California Code of Regulations contain a complex set of rules for determining whether a different
26

27 ² Attached as **Exhibit 8** is a true and correct copy of an e-mail the Committee sent to the
28 Registrar requesting electronic copies of prior reports provided, including for duplicate signatures.
Attached as **Exhibit 9** is a true and correct copy of a follow up request for such electronic reports.

1 address should disqualify a signature depending on when the address was changed. *See generally*
2 Cal. Code Regs., tit. 2, § 20910 *et seq.* Moreover, voter addresses are often changed involuntarily
3 by the Registrar upon receipt of information from third-parties, such as the U.S. Postal Service’s
4 National Change of Address (NCOA) database (generally received and processed monthly);
5 California Department of Motor Vehicles Change of Address (DMVCOA) database (generally
6 received and processed daily); California Secretary of State statewide voter registration duplicate
7 checks (generally received and processed daily); and others. When such addresses are
8 involuntarily updated, the Registrar is required to send the voter a notice informing them as much,
9 otherwise the voter has no way of knowing that his registered address may have changed—which
10 would affect what address the voter includes in the petition. To examine these issues, the
11 Committee requires for these 32,000-plus voters: (i) all prior addresses on file for that voter; (ii)
12 the dates that the registered address was changed or updated; (iii) the reason for the change or
13 update; and (iv) the notifications provided to the voter of any involuntary address change. The
14 Registrar has provided a report (for use at the Registrar’s office only) for such voters showing
15 when an address was changed or updated by the Registrar during the circulation period. The
16 Registrar has agreed to produce the voter notifications, but has declined to even begin looking for
17 this information until December 5.³ It has otherwise declined to provide the remaining data. The
18 Committee is entitled to all of this data under the Public Records Act and Elections Code section
19 2194, and is entitled to a timely production of that data.

20 d. **Validated Signatures.** The Committee has consistently found petition
21 signatures marked as “VS” on the petition—for “validated signature”—yet marked as rejected in
22 the Petition Signer Module. The Committee is attempting to determine how many such signatures
23 exist, but to do so efficiently the Committee requires a report of all valid signatures from the
24 Petition Signer Module. Otherwise, the Committee is left conducting an extremely inefficient
25

26 ³ Attached as **Exhibit 10** is a true and correct copy of the Committee’s request for voter
27 notifications and the Registrar’s initial decision to decline to produce the notifications. Attached
28 as **Exhibit 11** is a true and correct copy of the Registrar’s subsequent agreement to produce the
notifications after December 5.

1 comparison of the petition signature against the computer database, as described above. Attached
2 as **Exhibit 12** is a true and correct copy of one of the written requests made for this data. The
3 Registrar has refused to provide this to the Committee. The Committee is entitled to this data
4 under the Public Records Act.

5 e. **DIMS Training Material.** The DIMS system contains the voter's
6 registration file and contains all the voter information needed to determine whether signatures are
7 valid. As alleged here, the Committee has not only been given limited access to the DIMS system,
8 the Registrar has refused to provide any training or other materials to explain the system. The
9 DIMS system contains numerous codes, abbreviated terms, undefined dates, and so on that cannot
10 be understood without a legend or user manual. The Registrar has declined to provide the
11 Committee with this material, and the Registrar's staff has given the Committee inconsistent oral
12 explanations of the various items of information in the DIMS system. The Registrar is required to
13 give the Committee access to such records and information under the Public Records Act. The
14 Registrar's refusal to provide this information not only lengthens the review process substantially,
15 but renders the results of the review potentially inaccurate.

16 28. Furthermore, despite the Committee's good faith attempts to complete its review
17 within the narrow parameters that the Registrar has set forth, it has since become clear that a
18 timely review within these parameters is simply impossible. As alleged above, the Registrar has
19 limited the Committee to reviewing signatures in-person at its offices only three days per week;
20 limited the Committee to 14 representatives per day; and limited the Committee to seven computer
21 workstations each operated by one staff person. Under these conditions, the Committee has been
22 able to review only 1,200 signatures per week. With over 195,000 rejected signatures, it will take
23 the Committee over eighteen months to complete its review.⁴ To put this into perspective, this
24 would be ten months after the Registrar is statutorily required to *destroy* the recall petition under
25 Elections Code section 17400, and approximately the same time as the next regularly-scheduled
26

27 ⁴ This time estimate excludes the time needed to review the 88,000-plus signatures rejected
28 as "not registered." The Committee is attempting to assess those rejections more efficiently off-
site—but may eventually need to start reviewing them on-site.

1 primary election for Los Angeles County District Attorney. This is plainly beyond any timeframe
2 that the Legislature envisioned for a recall proponent's review of the petition under Government
3 Code section 6253.5, and it effectively denies the Committee its statutory right to conduct a
4 meaningful review of the petition to determine the reason why signatures were disqualified. Of
5 course, the Committee is continually attempting to find ways to more efficiently review the
6 petition signatures. But as long as the Registrar maintains the current parameters on the
7 Committee's review, there is no efficiency that the Committee can create that will allow the
8 review process to be completed within anything resembling a reasonable period of time.

9 29. The Committee has submitted written and oral requests to the Registrar for the data
10 needed to conduct a full and fair examination of the petition, including for the data and documents
11 sought here, but the Registrar has either refused the Committee's requests, ignored the requests
12 altogether, or agreed to produce records only on an unreasonable timeline.

13 30. On September 21, 2022, counsel for the Committee sent a letter to the Registrar
14 requesting that it expand the hours and equipment for the review process, as well as provide it
15 with access to the information it is seeking. This included a request that the Registrar increase the
16 resources that the Committee may use to conduct the review, including increasing the review from
17 three to five days per week, permitting up to 25 Committee representatives and permitting the use
18 of 25 computer workstations to conduct the review.⁵ Attached as **Exhibit 13** is a true and correct
19 copy of this letter. The Registrar not only refused to provide such accommodations, but it stated
20 that it may *decrease* the resources that the Committee could use in the future. Attached as **Exhibit**
21 **14** is a true and correct copy of the Registrar's response letter. Given the Registrar's posture, the
22 Committee is left with no option except to file suit.

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24
25
26 ⁵ Having observed the Registrar's staff members operate the DIMS system for the past four
27 weeks, the Committee is now sufficiently comfortable and knowledgeable about the system to
28 operate the system on its own without a staff member present, particularly if the Court orders the
Registrar to provide the necessary training manuals.

1 **FIRST CAUSE OF ACTION**

2 **(WRIT OF MANDATE)**

3 31. The Committee incorporates by reference the preceding paragraphs as if fully set
4 forth herein.

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

14 33. The Committee is entitled to a writ of mandate under the California Public Records
15 Act. Under Government Code section 6258, a writ of mandate is available to enforce the “right to
16 inspect or to receive a copy of any public record or class of public records.” All hearings and
17 proceedings under the Public Records Act “shall be set by the judge of the court with the object of
18 securing a decision as to these matters at the earliest possible time.” *Id.*

19 34. The Committee is entitled to a writ of mandate under California Elections Code
20 section 13314, which provides that an elector may seek “a writ of mandate alleging that . . . any
21 neglect of duty has occurred, or is about to occur,” where “the error, omission, or neglect is in
22 violation of this code or the Constitution” and “issuance of the writ will not substantially interfere
23 with the conduct of the election.” Elec. Code § 13314(a)(1), (2). Such an action “shall have
24 priority over all other civil matters.” *Id.* § 13314(a)(3).

25 35. The Committee is the official proponent of the petition to recall District Attorney
26 George Gascón under Elections Code section 343. In July 2022, the Committee submitted the
27 petition to the Registrar for review and certification. On August 15, 2022, the Registrar certified
28 the petition as insufficient. Thereafter, the Committee exercised, and continues to exercise, its

1 statutory right under Elections Code section 11301 and Government Code section 6253.5 to
2 review the petition and associated records to determine “which signatures were disqualified and
3 the reasons therefor.”

4 36. The Registrar has refused to provide the Committee with records that the
5 Committee is entitled to inspect and review during the petition review process. The Registrar has
6 a duty, enforceable by writ of mandate, to make such records timely available to the Committee’s
7 representatives to inspect and review, including:

- 8 a. For all voters whose recall petition signature was rejected on the basis of a
9 mismatched signature, all signatures on file for that voter;
- 10 b. For all voters whose recall petition signature was rejected on the basis that
11 the voter’s residence address as written on the petition did not match the
12 voter’s registered address, an electronic list containing: (i) all prior
13 addresses on file for that voter; (ii) the dates the registered address was
14 changed or updated; (iii) the reason for the change or the update; and (iv)
15 the notifications provided to the voter of any involuntary address change or
16 update;
- 17 c. An electronic copy of lists of: (i) all voters whom the Registrar found
18 submitted a valid signature in support of the recall petition; (ii) all voters
19 whose recall petition signature was invalidated as a duplicate signature; (iii)
20 all voters whose signatures were invalidated because their registrations were
21 canceled by reason of death; and (iv) all voters whose signatures were
22 invalidated for “fatal pending”;
- 23 d. All training materials or user manuals for the EMS-DIMS Election
24 Management System, which includes definitions of all codes, abbreviated
25 terms, and other information necessary to reasonably interpret the data
26 contained in the system; and
- 27 e. All data and information that the Registrar relied on in rejecting a petition
28 signature, or that is otherwise relevant to the determination of whether a

1 petition signature was validly rejected.

2 37. Furthermore, the Registrar has limited the time, place, and manner in which the
3 Committee can undertake the petition review process, so as to effectively eviscerate the right to
4 the review. The Registrar has a mandatory duty, enforceable by writ of mandate, to grant
5 Committee representatives reasonable access to the Registrar's office and facilities to conduct the
6 petition review, including:

- 7 a. Permit Committee representatives to examine the recall petition five days
8 per week;
- 9 b. Permit up to 25 Committee representatives to examine the recall petition at
10 any one time;
- 11 c. Expand the number of computer workstations with access to voter files to
12 25; and
- 13 d. Permit Committee representatives to use personal electronic devices during
14 the review process.

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

19 39. Unless compelled by this Court to perform those acts and duties and to refrain from
20 acts as required by law, the Registrar will continue to refuse to perform said duties and continue to
21 violate the law, and the Committee will be injured as a result. The Committee has no plain,
22 speedy, and adequate alternative remedy.

23 **SECOND CAUSE OF ACTION**
24 **(INJUNCTIVE RELIEF)**

25 40. The Committee incorporates by reference the preceding paragraphs as if fully set
26 forth herein.

27 41. Code of Civil Procedure section 526 authorizes a court to issue injunctive relief.
28 Such relief is warranted: (i) where the moving party "is entitled to the relief demanded, and the

1 relief, or any part thereof, consists in restraining the commission or continuance of the act
2 complained of, either for a limited period or perpetually” (§ 526(a)(1)); (ii) “the commission or
3 continuance of some act during the litigation would produce waste, or great or irreparable injury,
4 to a party to the action” (§ 526(a)(2)); (iii) where “a party to the action is doing, or threatens, or is
5 about to do, or is procuring or suffering to be done, some act in violation of the rights of another
6 party to the action in respecting the subject of the action, and tending to render the judgment
7 ineffectual” (§ 526(a)(3)); or (iv) when pecuniary compensation would not afford adequate relief
8 (§ 526(a)(4)).

9 42. The Committee is entitled to injunctive relief under the California Public Records
10 Act. Under Government Code section 6258, a person may seek injunctive relief to enforce the
11 “right to inspect or to receive a copy of any public record or class of public records.” All hearings
12 and proceedings under the Public Records Act “shall be set by the judge of the court with the
13 object of securing a decision as to these matters at the earliest possible time.” *Id.*

14 43. The Committee is the official proponent of the petition to recall District Attorney
15 George Gascón under Elections Code section 343. In July 2022, the Committee submitted the
16 petition to the Registrar for review and certification. On August 15, 2022, the Registrar certified
17 the petition as insufficient. Thereafter, the Committee exercised, and continues to exercise, its
18 statutory right under Elections Code section 11301 and Government Code section 6253.5 to
19 review the petition and associated records to determine “which signatures were disqualified and
20 the reasons therefor.”

21 44. The Registrar has refused to provide the Committee with records that the
22 Committee is entitled to inspect and review during the petition review process. The Registrar has
23 a duty to make such records available to the Committee’s representatives to timely inspect and
24 review, including:

- 25 a. For all voters whose recall petition signature was rejected on the basis of a
26 mismatched signature, all signatures on file for that voter;
- 27 b. For all voters whose recall petition signature was rejected on the basis that
28 the voter’s residence address as written on the petition did not match the

1 voter's registered address, an electronic list containing: (i) all prior
2 addresses on file for that voter; (ii) the dates the registered address was
3 changed or updated; (iii) the reason for the change or the update; and (iv)
4 the notifications provided to the voter of any involuntary address change or
5 update;

- 6 c. An electronic copy of lists of: (i) all voters whom the Registrar found
7 submitted a valid signature in support of the recall petition; (ii) all voters
8 whose recall petition signature was invalidated as a duplicate signature; (iii)
9 all voters whose signatures were invalidated because their registrations were
10 canceled by reason of death; and (iv) all voters whose signatures were
11 invalidated for "fatal pending";
- 12 d. All training materials or user manuals for the EMS-DIMS Election
13 Management System, which includes definitions of all codes, abbreviated
14 terms, and other information necessary to reasonably interpret the data
15 contained in the system; and
- 16 e. All data and information that the Registrar relied on in rejecting a petition
17 signature, or that is otherwise relevant to the determination of whether a
18 petition signature was validly rejected.

19 45. Furthermore, the Registrar has limited the time, place, and manner in which the
20 Committee can undertake the petition review process, so as to effectively deny the right to the
21 review. The Registrar has a duty to grant Committee representatives reasonable access to the
22 Registrar's office and facilities to conduct the petition review, including:

- 23 a. Permit Committee representatives to examine the recall petition five days
24 per week;
- 25 b. Permit up to 25 Committee representatives to examine the recall petition at
26 any one time;
- 27 c. Expand the number of computer workstations with access to voter files to
28 25;

1 d. Permit Committee representatives to use personal electronic devices during
2 the review process.

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

8 47. The Committee is entitled to temporary, preliminary and permanent injunctive
9 relief requiring the Registrar to provide the Committee with access to records and access to office
10 facilities as alleged herein.

11 **THIRD CAUSE OF ACTION**
12 **(DECLARATORY RELIEF)**

13 48. The Committee incorporates by reference the preceding paragraphs as if fully set
14 forth herein.

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

21 50. The Committee is also entitled to declaratory relief under the California Public
22 Records Act. Under Government Code section 6258, declaratory relief is available to enforce the
23 "right to inspect or to receive a copy of any public record or class of public records." All hearings
24 and proceedings under the Public Records Act "shall be set by the judge of the court with the
25 object of securing a decision as to these matters at the earliest possible time." *Id.*

26 51. An actual controversy exists between the Committee and the Registrar with respect
27 to the scope of the records that the Registrar must provide to the Committee during its review of
28 the petition. In particular, the Registrar has refused to provide the Committee with records that the

1 Committee has a statutory right to timely inspect and review during the petition review process,
2 including under the California Public Records Act and the California Elections Code. In
3 particular, the Committee has a statutory right to timely inspect and review the following records:

- 4 a. For all voters whose recall petition signature was rejected on the basis of a
5 mismatched signature, all signatures on file for that voter;
- 6 b. For all voters whose recall petition signature was rejected on the basis that
7 the voter's residence address as written on the petition did not match the
8 voter's registered address, an electronic list containing: (i) all prior
9 addresses on file for that voter; (ii) the dates the registered address was
10 changed or updated; (iii) the reason for the change or the update; and (iv)
11 the notifications provided to the voter of any involuntary address change or
12 update;
- 13 c. An electronic copy of lists of: (i) all voters whom the Registrar found
14 submitted a valid signature in support of the recall petition; (ii) all voters
15 whose recall petition signature was invalidated as a duplicate signature; (iii)
16 all voters whose signatures were invalidated because their registrations were
17 canceled by reason of death; and (iv) all voters whose signatures were
18 invalidated for "fatal pending";
- 19 d. All training materials or user manuals for the EMS-DIMS Election
20 Management System, which includes definitions of all codes, abbreviated
21 terms, and other information necessary to reasonably interpret the data
22 contained in the system; and
- 23 e. All data and information that the Registrar relied on in rejecting a petition
24 signature, or that is otherwise relevant to the determination of whether a
25 petition signature was validly rejected.

26 52. Furthermore, the Registrar has limited the time, place, and manner in which the
27 Committee can undertake the petition review process, so as to effectively eviscerate the right to
28 the review. Those limitations are therefore contrary to the right to petition review guaranteed

1 under Election Code section 11301 and Government Code section 6253.5. The Court should
2 therefore issue a judicial declaration declaring the current restrictions placed on the review process
3 invalid, declaring the following parameters to be the minimum parameters necessary for an
4 effective review of the petition, and ordering the Registrar to implement these parameters:

- 5 a. Committee representatives may examine the recall petition five days per
6 week;
- 7 b. Up to 25 Committee representatives may examine the recall petition at any
8 one time;
- 9 c. At least 25 computer workstations with access to voter files must be made
10 available to Committee representatives; and
- 11 d. Committee representatives may use personal electronic devices during the
12 review process.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Petitioner prays for relief as follows:

- 15 1. That a preemptory writ of mandate issue commanding Respondents to make the
16 following records timely available to Petitioner:
 - 17 a. For all voters whose recall petition signature was rejected on the basis of a
18 mismatched signature, all signatures on file for that voter;
 - 19 b. For all voters whose recall petition signature was rejected on the basis that
20 the voter's residence address as written on the petition did not match the
21 voter's registered address, an electronic list containing: (i) all prior
22 addresses on file for that voter; (ii) the dates the registered address was
23 changed or updated; (iii) the reason for the change or the update; and (iv)
24 the notifications provided to the voter of any involuntary address change or
25 update;
 - 26 c. An electronic copy of lists of: (i) all voters whom the Registrar found
27 submitted a valid signature in support of the recall petition; (ii) all voters
28 whose recall petition signature was invalidated as a duplicate signature; (iii)

- 1 all voters whose signatures were invalidated because their registrations were
2 canceled by reason of death; and (iv) all voters whose signatures were
3 invalidated for “fatal pending”;
- 4 d. All training materials or user manuals for the EMS-DIMS Election
5 Management System, which includes definitions of all codes, abbreviated
6 terms, and other information necessary to reasonably interpret the data
7 contained in the system; and
- 8 e. All data and information that the Registrar relied on in rejecting a petition
9 signature, or that is otherwise relevant to the determination of whether a
10 petition signature was validly rejected.
- 11 2. That a preemptory writ of mandate issue commanding Respondents to make the
12 following resources available to Petitioner during the recall inspection process:
- 13 a. Committee representatives may examine the recall petition five days per
14 week;
- 15 b. Up to 25 Committee representatives may examine the recall petition at any
16 one time;
- 17 c. At least 25 computer workstations with access to voter files must be made
18 available to Committee representatives;
- 19 d. Permit Committee representatives to use personal electronic devices during
20 the review process.
- 21 3. In the alternative, that an alternative writ of mandate issue commanding
22 Respondents to cease acting and/or to act as specified in Paragraphs 1 and 2 of this
23 Prayer for Relief, or to show cause why they should not be ordered to do so, and
24 upon return of the alternative writ, that the court issue a preemptory writ as set
25 forth in Paragraphs 1 and 2 of this Prayer for Relief or issue such other
26 extraordinary relief as is warranted;
- 27 4. For a temporary restraining order, preliminary injunction, and/or permanent
28 injunction to cease acting and/or to act as specified in Paragraphs 1 and 2 of this

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Prayer for Relief;

5. For a judicial declaration that Respondents have acted unlawfully in not acting as specified in Paragraphs 1 and 2 of this Prayer for Relief;
6. For attorney's fees and costs incurred herein; and
7. For such other and further relief as the court deems just and proper.

DATED: October 18, 2022

ELLIS GEORGE CIPOLLONE
O'BRIEN ANNAGUEY LLP
Eric M. George
David J. Carroll
Chase Harrington



By: _____
Eric M. George
Attorneys for Plaintiff and Petitioner Committee to
Support the Recall of District Attorney George Gascon

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 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 October 18, 2022, at Los Angeles, California.

DocuSigned by

 795283E75F

785283F7ED0E4AF...
Kathleen M. Cady

EXHIBIT 1



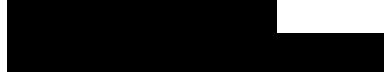
LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

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.)

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		
	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:

- That I am 18 years of age or older.
- 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 _____.)
- 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.
- 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 _____

RECEIVED

2022 JAN 19 PM 3:43

COUNTY OF LOS ANGELES
REG-REC/CO. CLK
ELECTRONIC

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.

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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.

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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 _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	2. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	3. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	4. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	5. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	6. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	7. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	8. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	
	9. _____ Print Your Name _____ Your Signature As Registered to Vote	_____ Residence Address Only _____ City _____ Zip	

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.

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 Funding” 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](https://www.lavote.gov) and follow us on Twitter @LACountyRRCC.

###



EXHIBIT 4

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 5



Marian Thompson <[REDACTED]>

Rev Request to Inspect Recall Petition

Marian Thompson <[REDACTED]>

Thu, Aug 18, 2022 at 1:30 AM

To: dlogan@rrcc.lacounty.gov, Alex Olvera <AOlvera@rrcc.lacounty.gov>

Cc: Steve Cooley <[REDACTED]>, Cassandra Vandenberg <[REDACTED]>, Tim Lineberger <[REDACTED]>, Eric George <[REDACTED]>, David Carroll <[REDACTED]>

Mr. Logan,

The proponents of the Recall DA George Gascon Committee, and/or their representatives, plan to inspect the recall petition to determine the reasons for the rejection of close to 200,000 signatures collected from the more than 1/2 million supporters of the recall effort to remove DA George Gascon.

Please provide the deadline date to physically commence the inspection, which the law provides is within 21 days of the RR/CC's findings, any requirements and/or restrictions, and the parameters of such an inspection, including but not limited to, manner, time, and place.

Please also provide the manner in which, and to whom, any questions and/or challenges should be presented, whether such challenges are based on obvious and clear errors or otherwise.

We would appreciate a comprehensive response to this email by the close of business today, so we may begin preparations for the inspection.

Thank you in advance for your courtesy and cooperation.

Best regards,

Marian Thompson

Sent from my iPhone

EXHIBIT 6



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.

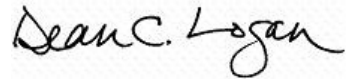
During this review, the Proponent and their representative(s) (Proponent) designated in writing will have the opportunity to review the Petition signatures that were disqualified and the reasons for their disqualification. This includes viewing the Petition itself and the voter record data or information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

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,

A handwritten signature in black ink that reads "Dean C. Logan". The signature is written in a cursive, flowing style.

DEAN C. LOGAN
Registrar-Recorder/County Clerk

DCL:JG
MF:EC

EXHIBIT 7

Archived: Tuesday, October 18, 2022 5:36:07 PM

From: [Emmanuel Anyiwo](#)

Mail received time: Tue, 20 Sep 2022 15:26:51

Sent: Tue, 20 Sep 2022 15:26:40

To: [Marian Thompson](#)

Cc: [Cassandra Vandenberg](#) [Chris Landau](#) [David J. Carroll](#) [Eric M. George](#) [Kathleen Cady](#) [Steve Cooley](#) [Tim Lineberger](#)
[Monica Flores](#)

Subject: RE: REQUEST FOR INFORMATION

Importance: Normal

Sensitivity: None

Ms. Thompson,

We have received various questions from you since the initiation of the DA Recall Petition Examination on September 6, 2022. To address the questions that are within the authorized scope of the examination process, we have made available additional reports in the examination room including:

1. Report of signatures challenged as Canceled Deceased with a deceased date.
2. Report of signatures challenged as Fatal Pending with a Fatal Pending reason code.
3. Report of signatures challenged as Duplicate signatures with all other signature for the voter, including accepted signatures.

These reports provide the information needed to answer most of the questions you submitted. We are working on at least one more report to provide data that can assist with your examination and responses to outstanding questions within the authorized examination scope.

Questions for which the reports do not provide responses for have been determined to exceed the authorized scope of the examination by proponents as set forth in Government Code section 6253.5. As such, additional information cannot be provided.

Thank you.

From: Marian Thompson <[REDACTED]>

Sent: Thursday, September 8, 2022 9:55 AM

To: Emmanuel Anyiwo <EAnyiwo@rrcc.lacounty.gov>

Cc: Cassandra Vandenberg <[REDACTED]>; Chris Landau <[REDACTED]>; David J. Carroll
<[REDACTED]>; Eric M. George <[REDACTED]>; Kathleen Cady <[REDACTED]>; Steve Cooley
<[REDACTED]>; Tim Lineberger <[REDACTED]>

Subject: REQUEST FOR INFORMATION

CAUTION: External Email. Proceed Responsibly.

Emmanuel,

You have provided us with a list of voters whose signatures were rejected on the recall petition for different address (DA). Please provide evidence that each of the 32,187 voters whose signatures were rejected for different address (DA), and whose voter files were updated with an address different from the address entered in the recall petition, received a Voter Notification Card (VNC), or other notification, including section 8(d) notification, from the ROV notifying the voter of the address change prior to signing the recall petition, under Elections Code section 2119, Article 2 (commencing with Section 2220), or the NVRA.

This information is critical to a meaningful inspection of the RR/CC examination of the petition, and not available to us in the current inspection process, which has restricted our access to the complete voter file for each voter who signed the recall petition whose signature was rejected.

Additionally, this information should substantially reduce the length and duration of the inspection process.

Please provide this information as soon as possible.

Best regards,

Marian M.J. Thompson

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Sent from Gmail Mobile

EXHIBIT 8

Archived: Tuesday, October 18, 2022 5:36:57 PM

From: [Marian Thompson](#)

Mail received time: Thu, 22 Sep 2022 17:43:47

Sent: Thu, 22 Sep 2022 17:43:30

To: eanyiwo@rcc.lacounty.gov

Cc: [Cassandra Vandenberg](#) [David J. Carroll](#) [Eric M. George](#) [Gregory Foster](#) [Kathy Cady](#) [Steve Cooley](#) [Tim Lineberger](#) [Chris Landau](#)

Subject: Reports

Importance: Normal

Sensitivity: None

We are requesting a PDF copy of the DUP/VS, and PRIOR ADDRESS reports you provided to us on 9/15 and 9/20, respectively. Utilizing these reports onsite is extremely burdensome and unwieldy, and have not served to expedite the inspection process. However, access to these reports digitally in PDF would enable us to quickly extrapolate critical data in quick order offsite. This would significantly reduce the length of the inspection process by many months, as well as your allocation of manpower and resources to the GC 6253.5 inspection.

Please advise how quickly we can receive these reports in PDF format.

Best regards,

Marian M. J. Thompson

EXHIBIT 9

Archived: Tuesday, October 18, 2022 5:37:15 PM

From: [Marian Thompson](#)

Sent: Tue, 4 Oct 2022 17:51:44

To: eamywo@rrcc.lacounty.gov mflores@rrcc.lacount

Cc: [Cassandra Vandenberg](#) [Chase Harrington](#) [David J. Carroll](#) [Eric M. George](#) [Kathy Cady](#) [Steve Cooley](#) [Tim Lineberger](#)

Subject: RDAGG Recall Inspection

Importance: Normal

Sensitivity: None

Emmanuel,

This morning Representatives started highlighting pages from 1 set of binders (out of 7 sets) of the DUP report generated from the Petition Signer Module to, among other things, identify those signatures that were rejected as a DUP and another rejection category. This was done to quickly identify petition pages for your staff to pull to permit us to inspect the reason why signatures were rejected in a more expedited fashion.

We have since been instructed not to write on any of the reports generated by your office for our use during the inspection. In a discussion with you this morning, you referenced this “rule” was listed in the petition guidelines provided by your office prior to the commencement of the inspection. It is not. Rather, the rules instruct not to write on the Petition. See item 9 of your petition guidelines.

These last minute changes to the rules do nothing to promote a fair, transparent, and expedient inspection process, both for the Committee and your office. In fact, they only serve to prolong the inspection process, and make unnecessary work for your staff.

On behalf of the Committee, I am reiterating the request for a PDF of all reports generated by your office for our use, and in the meantime, that you allow us to use one set of binders to mark up while on site to expedite the inspection process. In the latter case, your office still retains possession of the marked binder set.

Best regards,

Marian M. J. Thompson
Attorney for Committee to RDAGG

EXHIBIT 10

Archived: Tuesday, October 18, 2022 5:37:28 PM

From: [Emmanuel Anyiwo](#)

Mail received time: Fri, 9 Sep 2022 18:21:46

Sent: Fri, 9 Sep 2022 18:20:30

To: [Marian Thompson](#)

Cc: [Cassandra Vandenberg](#) [Chris Landau](#) [David J. Carroll](#) [Eric M. George](#) [Kathleen Cady](#) [Steve Cooley](#) [Tim Lineberger](#)
[Monica Flores](#)

Subject: RE: REQUEST FOR INFORMATION

Importance: Normal

Sensitivity: None

Ms. Thompson,

We have reviewed your request for evidence that the voters whose signatures were challenged for different address received a notification of their address change from our office. This request exceeds the authorized scope of the examination by proponents as set forth in Government Code section 6253.5.

If you would like us to process this as a PRA request, please provide additional specificity on the documents you would like to receive. In particular, types of documents and date range of those records.

Thank you.

Emmanuel Anyiwo, Manager

Voter Records Division

Registrar-Recorder/County Clerk

12400 Imperial Hwy. Norwalk, CA. 90650

Office: (562) 462-2693

Mobile: (562) 293-8236

EAnyiwo@rrcc.lacounty.gov



NOTICE/CONFIDENTIAL: This e-mail message and the attached document(s), if any, are intended only for the official and confidential use of the individual(s) or entity to which it is addressed. If the reader of this e-mail message is not the intended recipient, or the employee or agent responsible for delivering the message and/or attached document(s) to the intended recipient(s), you are hereby given notice that any unauthorized use, dissemination, forwarding or copying of this communication is strictly prohibited. If you have received this communication in error, please contact the sender by reply e-mail or telephone and delete the original message and any attached document(s) from your system. Thank you.

From: Marian Thompson <[REDACTED]>

Sent: Thursday, September 8, 2022 9:55 AM

To: Emmanuel Anyiwo <[REDACTED]>

Cc: Cassandra Vandenberg <[REDACTED]>; Chris Landau <[REDACTED]>; David J. Carroll
<[REDACTED]>; Eric M. George <[REDACTED]>; Kathleen Cady <[REDACTED]>; Steve Cooley
<[REDACTED]>; Tim Lineberger <[REDACTED]>

Subject: REQUEST FOR INFORMATION

CAUTION: External Email. Proceed Responsibly.


Emmanuel,

You have provided us with a list of voters whose signatures were rejected on the recall petition for different address (DA). Please provide evidence that each of the 32,187 voters whose signatures were rejected for different address (DA), and whose voter files were updated with an address different from the address entered in the recall petition, received a Voter Notification Card (VNC), or other notification, including section 8(d) notification, from the ROV notifying the voter of the address change prior to signing the recall petition, under Elections Code section 2119, Article 2 (commencing with Section 2220), or the NVRA.

This information is critical to a meaningful inspection of the RR/CC examination of the petition, and not available to us in the current inspection process, which has restricted our access to the complete voter file for each voter who signed the recall petition whose signature was rejected.

Additionally, this information should substantially reduce the length and duration of the inspection process.

Please provide this information as soon as possible.

Best regards,

Marian M.J. Thompson

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Sent from Gmail Mobile

EXHIBIT 11



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN
Registrar-Recorder/County Clerk

September 29, 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 September 19, 2022. Specifically, you requested the following information:

"Please provide any "writings" within the last four (4) years that document that each of the 32,187 voters whose signatures were rejected for different address (DA) during the recall examination process conducted by your office, and whose voter files were updated with an address different from the address entered in the recall petition, received an address confirmation card, Voter Notification Card (VNC), or other written notification, including section 8(d)(2) notification, from the ROV notifying the voter of the last address change listed in their voter file before the voter signed the recall petition, commencing with Elections Code section 2119, Article 2, or the NVRA.

Under the Petition Instruction Summary used by your office, examiners were directed to document in writing the address each signer entered on the petition if the signature is rejected for Different Address. Please provide any "writings" (or a list thereof) of all signatures invalidated for Different Address, along with the address entered on the petition by each signer for each of the 32,187 invalidated signatures."

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.)

The first part of your request seeks information that requires data compilation, extraction, or programming to produce, which you are required to pay for pursuant to Government Code section 6253.9(b). Per Los Angeles County Code Section 2.170.010, you are also required to pay for any costs incurred in connection with duplication of records and for staff to locate, retrieve

and refiled records provided. Additionally, due to the voluminous nature of this request, the County will need to locate and assign staffing resources to manually search for, and thoroughly inspect thousands of records. Currently, staffing resources are limited due to current time-sensitive projects, such as the upcoming November General Election. The County expects to begin its search for records requested on December 5, 2022, after the certification of the November General Election. Moreover, records responsive to this request are maintained for two years in accordance with the NVRA, and records exceeding the two-year timeframe may no longer be available. The County reserves its right to assert all applicable privileges/doctrines and exemptions.

Regarding the second part of your request, *"please provide any "writings" (or a list thereof) of all signatures invalidated for Different Address, along with the address entered on the petition by each signer for each of the 32,187 invalidated signatures,"* the records responsive to your request are not subject to disclosure under the California Public Records Act. Government Code Section 6253.5(a) states, "all memoranda prepared by the county elections officials in the examination of the petitions indicating which registered voters have signed particular petitions shall not be deemed to be public records and shall not be open to inspection except by the public officer or public employees who have the duty of receiving, examining or preserving the petitions or who are responsible for the preparation of that memoranda." **See also** Government Code Sections 6254(k), 6254.4, 6255(a); Elections Code Sections 11301, 17200, 17400. Additionally, the records requested have already been made available to you as part of the petition review process.

If you wish to proceed with the purchase of such records, please indicate so in writing. The County will then provide you with an estimated timeframe and cost to produce the records responsive to your request.

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

Respectfully,

DEAN C. LOGAN
Registrar-Recorder/County Clerk

A handwritten signature in dark ink, appearing to read "Julane Whalen", written in a cursive style.

JULANE WHALEN
Registrar-Recorder/County Clerk
Executive Office

EXHIBIT 12

Archived: Tuesday, October 18, 2022 5:37:53 PM

From: [Marian Thompson](#)

Mail received time: Sun, 25 Sep 2022 15:13:02

Sent: Sun, 25 Sep 2022 15:12:43

To: eanyiwo@rccc.lacounty.gov

Cc: [Cassandra Vandenberg](#) [Chris Landau](#) [David J. Carroll](#) [Eric M. George](#) [Gregory Foster](#) [Kathy Cady](#) [Steve Cooley](#) [Tim Lineberger](#)

Subject: Accepted Signatures

Importance: Normal

Sensitivity: None

Emmanuel,

We have independently verified that the original ten (10) binders do not contain accurate information. Our analysis reveals there are at least 346 less invalidated signatures than reported by your office on August 15. Please recheck the number of invalidated signatures in these binders, and confirm the accuracy of your count.

Additionally, please provide a report listing all accepted signatures to enable us to independently cross-check the accuracy of the total number of invalidated and validated signatures as soon as possible. This information is critical to an accurate and reliable inspection of invalidated signatures. Every vote counts.

Also, please respond by close of business on Monday, September 26, 2022, whether your office intends to provide us with this report, along with a response to our September 22, 2022 email requesting a PDF of both the Duplicate and Prior Address reports, hard copies of which were made available for viewing only in Room 3001 last week.

Best regards,

Marian M. J. Thompson
Attorney for RDAGG

EXHIBIT 13

September 21, 2022

Via Hand Delivery

Dean C. Logan
Los Angeles County
Registrar-Recorder/County Clerk
12400 Imperial Highway
Norwalk, California 90650

Re: Committee to Support the Recall of District Attorney George Gascón
Elections Code Section 6253.5 Recall Signature Inspection

Dear Mr. Logan:

This firm, along with Marian M. J. Thompson, are counsel for the Committee to Support the Recall of District Attorney George Gascon (the "Committee"). We have learned from the Committee that the Los Angeles County Registrar-Recorder/County Clerk's Office has made arbitrary and capricious decisions that restrict the Committee's inspection of the 195,783 recall signatures invalidated by your office under Government Code section 6253.5. The recall signature inspection commenced on September 6, 2022 and is currently ongoing.

In the two weeks since it began the review process, the Committee has already uncovered a substantial number of improperly rejected petition signatures. For example, even though your office has adopted a policy that requires each signature be reviewed "at least 3 times" by elections officials before being invalidated, the official markings on the petition pages frequently make clear that fewer than three persons reviewed them. Likewise, there are multiple instances where signatures were rejected because the voter's address on the petition supposedly did not match their address in the voter file—yet, upon the Committee's review, the address on file for the voter was an identical match to that on the petition. Many signatures were incorrectly rejected as "printed" even when the voter's signature on file was itself printed, and many more signatures were rejected as duplicative without your office counting any one of the alleged duplicates. In addition, the Committee has determined that your office failed to properly update voter addresses following notification of a change of address from the U.S. Postal Service through the National Change of Address database, potentially leading to thousands of signatures being improperly rejected for having a different address. So far, the Committee believes that almost half of the signatures it has reviewed were improperly rejected.

Dean C. Logan
September 21, 2022
Page 2

These concerns make it all the more critical that your office provide the Committee with a full and fair opportunity to review the rejected signatures as mandated by Elections Code section 11301 and Government Code section 6253.5. The purpose of these statutes is to permit recall proponents and their representatives to determine whether signatures were improperly invalidated during the examination. They require, at a minimum, access to the same information and data used by elections officials during the examination, which your office has declined to provide. Moreover, the parameters that your office has imposed on the inspection process is unreasonably and unnecessarily prolonging that process. At the current rate, it will be many months before the review can be completed.

More specifically, your office has created the following roadblocks to an effective and efficient recall signature inspection process:

1. The Committee is limited to examining invalidated signatures to 3 days per week, Tuesday - Thursday, 9 a.m. - 4 p.m.
2. The Committee is limited to 14 representatives per day.
3. The Committee is limited to 7 computer workstations operated by one (1) staff person per workstation. (400-500 staff persons were involved in the 100% examination of the recall petition signatures.)
4. The Committee has been given very limited access to voter file data on the DIMS.net system (the software system used to store voter file information and data). This prevents representatives from being able to critically and fully examine the reasons why a signature was invalidated.
5. Representatives have also not been provided with any training or other materials for the DIMS.net system. This severely limits any ability to properly decipher both local and state system codes, abbreviated terms, dates, and other data in voter files critical to the signature inspection process. Instead, representatives have been instructed that they must rely on the multiple definitions and explanations provided by your staff. That information changes regularly and oftentimes proves to be inaccurate.
6. For those signatures invalidated as a "Mismatch,"¹ representatives have been denied access to all voter signatures on file for each voter who signed the petition. California

¹ California Code of Regulations, title 2, section 20960 provides that elections official must compare the signature on the recall petition to the "voter's signature(s)" in the voter's file.

Dean C. Logan
September 21, 2022
Page 3

Code of Regulations, title 2, sections 20910 – 20962 require elections officials to review all signatures on file. This makes inspection of signatures invalidated for “Mismatch” unnecessarily difficult and potentially inaccurate.

7. California election law requires elections officials to maintain all prior addresses in a voter’s file. For those signatures rejected for “Different Address,”² representatives have been denied access to all prior addresses on file for each voter who signed the petition. This information is necessary to determine whether a signature was improperly invalidated.
8. Representatives have also been denied access to information that would reveal what event or action triggered a change of address (COA) in the voter file, whether the voter was notified of the COA, how the voter was notified, and the date of any such notification (the law requires elections officials to notify the voter when their voter file is updated). In this instance, your office invalidated the signatures of 32,187 registered voters for “Different Address” who were directed to enter their “residence address” instead of their “address as registered.” Rejecting voters’ signatures because they followed your office’s directions effectively disenfranchises them, and we require this additional information to determine which voters (if any) were legitimately rejected on the basis of a different address.
9. Representatives have been instructed to submit all questions about invalidated signatures in writing. This is even though the answers to a substantial number of questions are readily available to your staff through the petition module system and DIMS.net. This has forced the Committee representatives to submit hundreds of written questions, almost none of which has been answered.
10. The Committee, through its counsel, Marian M. J. Thompson, submitted several written requests directly to Emmanuel Anyiwo, Division Manager, Voter Records. These requests were for additional information relevant to the signature inspection

² A signature may be invalidated as “Different Address” if the “residence address” listed by the voter on the petition does not match the “address as registered” in the voter’s file. California Code of Regulations, title 2, section 20931 provides that if an address change to a voter’s file occurred during the dates between which all signatures were obtained as reported in the declaration of circulator, “it shall be presumed that the voter signed the petition with their previous address prior to the effective date of the address change.” Without access to the voter’s prior address, it is impossible to determine whether a voter’s signature was improperly invalidated.

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process. Most of these written requests have either received no response at all or been met with a refusal to provide a response.

The Committee requests an immediate revision to the criteria, policies, and procedures to address the issues outlined above. The following must be permitted for the signature inspection process to be completed in a timely and accurate manner:

1. Expand the recall signature inspection process to five (5) days per week.
2. Expand the number of representatives who may participate in the recall signature inspection process to 25 per day.
3. Expand the number of workstations with access to voter files to 25.
4. Provide representatives training or other materials that explain the DIMS.net software system, the information, codes, and other data that may be found in voter files.
5. Provide representatives with access to all voter signatures on file for signatures rejected for "Mismatch" signatures.
6. Provide representatives with access to all prior addresses on file for signatures rejected for "Different Address."
7. Provide representatives with access to written notices sent to voters, along with comments in voter files, for voters whose signatures were invalidated, including all notifications under Elections Code sections 2220 – 2227.
8. Respond to questions submitted by representatives and/or Marian M. J. Thompson, counsel for the Committee, concerning matters related to the signature inspection process within 48 hours of submission.

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ELLIS GEORGE CIPOLLONE
O'BRIEN ANNAGUEY LLP

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We request a response from your office to these issues no later than close of business on Friday, September 23, 2022. We hope that further action is not required to enforce the Committee's right to a full and fair review process.

Sincerely,



Eric M. George

cc: Marian Thompson

EXHIBIT 14



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN
Registrar-Recorder/County Clerk

September 26, 2022

Eric M. George
Ellis George Cipollone O'Brien Annaguey, LLP
2121 Avenue of the Stars, 30th Floor
Los Angeles, CA 90067

**RE: Committee to Support the Recall of District Attorney George Gascon
Government Code section 6253.5 Recall Signature Inspection**

Dear Mr. George:

This acknowledges receipt of your September 21, 2022, correspondence in relation to the above referenced matter.

Your letter repeats previously submitted requests received from the Committee's designated representatives, Marian M. J. Thompson and Gregory Foster via email or in-person, during the inspection activities to which this office has already responded. Consistent with Elections Code section 11301 and exceeding the requirements of Government Code section 6253.5, we have created and provided reports to assist the Committee in its inspection of signatures that were disqualified and the reason(s) therefor. Questions for which the reports do not provide responses have been determined to exceed the authorized scope of the examination by proponents as set forth in Government Code section 6253.5.

The parameters of the examination were set-up consistent with past practice in other petition reviews and were outlined to the Committee in a pre-meet on August 29, 2022 and modified in response to reasonable requests related to capacity. With minimal exception, the number of Committee designees participating in the inspection daily has been consistently and, at times, significantly below the limitations established, with consistent turnover among participants. The Committee has also chosen a method and sequence of review that is contributing to a prolonged process. To the extent these conditions are asserted as roadblocks to an effective and efficient process, this office is not the responsible party.

The parameters and procedures established for the inspection appropriately recognize reasonable limits to ensure the preservation of the petitions, protect voter data that is not subject to public disclosure, operate within guidelines established to protect public health and safety related to COVID-19, and to allocate public resources in a manner to support the Committee's inspection while maintaining the Department's legal obligations to prepare for and administer the November 8, 2022, General Election.

Many of the assertions and demands in your letter exceed the clear and specific reference in Government Code section 6253.5 "...to determine ***which signatures were disqualified and the reasons therefor***" (emphasis added). The Code does not authorize an audit of the methodology used by the Registrar in carrying out the legal obligations for petition verification and reporting, does not contemplate or require the need for training and orientation in the use of the County's Election Management System, and does not establish a timeline or set a priority for supporting such a review over the statutory and fiduciary obligations of the Registrar; nor does it authorize access to non-public voter data beyond the identified scope.

Given the above, this office will continue to support the Committee's inspection to the extent it is legally obligated and within the reasonable parameters established and already in practice. As the November 8, 2022, General Election activities ramp up, we reserve the right to further modify the parameters based on operational need and capacity.

Should we have further response to the queries repeated in your letter, we will contact the representatives previously identified as the points of contact by the petition's proponents.

Sincerely,



DEAN C. LOGAN
Registrar-Recorder/County Clerk

c: Marian Thompson