

# KAUFMAN LEGAL GROUP

A PROFESSIONAL CORPORATION

June 20, 2022

## **VIA FEDERAL EXPRESS AND E-MAIL**

Mr. Jeremy Bocchino  
City Clerk/Elections Official  
City Hall  
9770 Culver Blvd.  
Culver City, CA 90232  
Email: Jeremy.bocchino@culvercity.org

**Re:        Request to Inspect and Obtain Copies of Initiative Petition Sections,**  
**Lists of Disqualified Signatures, and Materials Used to Disqualify**  
**Signatures**  
**Our File No.: SEI3505.006**

Dear City Clerk Bocchino:

As you know, our office represents Cass Gualvez, the proponent of an initiative proposal regarding increasing healthcare workers' minimum wage in Culver City. As the proponent's designated representative, I am writing to request inspection and copies of certain documents related to the initiative and petition.

On June 16, 2022, we received a copy of a letter and e-mail indicating that the initiative has insufficient signatures to qualify for the ballot. Based on the letter, there were 560 petition signatures that were deemed invalid and 20 duplicate signatures out of 3,344 signatures submitted.

Accordingly, we request access to inspect and to obtain copies of certain documents, as is our right under the California Constitution and the Public Records Act. (See Cal. Const., art. I, §3(b)(2); Cal. Gov't Code § 6253.5.) We believe that it would be in the best interests of all parties concerned and the public interest, to immediately schedule a meeting so that we may discuss the issues upon which signatures were challenged, to inspect and obtain copies of the petition sections containing the rejected signatures, and to inspect and obtain copies of the memoranda and materials used to determine that signatures were invalid. We request that such an inspection meeting commence at a mutually agreed upon time between June 23 and July 1.

As a preliminary matter, we request a list showing the rejection/challenge categories (e.g., different address, missing signatures, not registered to vote, outside of the City, mismatched signature, duplicate signatures etc.) and the number of signatures in each category. We also request to inspect and obtain copies of any lists containing the rejected signatures with the reasons for their rejection, copies of the petition sections containing the rejected signatures

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City Clerk/Elections Official  
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themselves together with copies of any materials (e.g., printouts, screenshots) from databases or other resources that were used to determine that a signature was invalid (including but not limited to materials which election officials used to determine signature mismatch, different address, that a voter lives outside the City, that a signature was a duplicate, and that a voter was not registered to vote, etc.) as is our right under California's Constitution and statutory law. (See e.g., Cal. Gov't Code § 6253.5.) We also request to view and to obtain copies of the information that was used for determining whether a petition signature matched a signature on an affidavit of voter registration and whether the voter was registered to vote at the address which they wrote on the petition. (See Cal. Elect. Code § 2194(a)(3), (c)(2).)

We believe that reaching clarity over the situation will benefit all concerned. We look forward to your response. We would be happy to discuss any aspect of this process with you. We would be happy arrange for photocopying or pay for any photocopying costs. If electronic versions of the documents that we request to inspect and copy are available or more practical to obtain/transmit, we request to discuss that option with you.

Feel free to contact me via e-mail at: [gyin@kaufmanlegalgroup.com](mailto:gyin@kaufmanlegalgroup.com), or we can schedule a time to discuss further.

Very truly yours,

  
George M. Yin

Enclosures

cc: Dean Logan, Los Angeles County Registrar Recorder/County Clerk,  
E-mail: [DLogan@rrcc.lacounty.gov](mailto:DLogan@rrcc.lacounty.gov)  
Alex Olvera, LA County RR/CC, Division Manager Election Preparation,  
E-mail: [aolvera@rrcc.lacounty.gov](mailto:aolvera@rrcc.lacounty.gov)  
Emmanuel Anyiwo, LA County RR/CC Division Manager, Voter Records,  
E-mail: [EAnyiwo@rrcc.lacounty.gov](mailto:EAnyiwo@rrcc.lacounty.gov)  
Tiffany Olsen, LA County RR/CC, Head, Data Entry and Signature  
Verification, E-mail: [tolsen@rrcc.lacounty.gov](mailto:tolsen@rrcc.lacounty.gov)



## LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN  
Registrar-Recorder/County Clerk

June 10, 2022

Ms. Jeremy Bocchino, City Clerk  
City of Culver City  
9770 Culver Boulevard  
Culver City, California 90232

Dear Ms. Bocchino:

We have completed the signature verification submitted on May 23, 2022, for An Initiative to Adopt a Healthcare Workers Minimum Wage Ordinance in the City of Culver City, Establishing a Minimum Wage of Twenty-Five Dollars Per Hour for Covered Employees Working at Healthcare Facilities. Initiative Measure.

The results of the signature verification are as follows:

Number of signatures filed	3,344
Number of signatures verified	3,344
Number of signatures found sufficient	2,784
Number of signatures found not sufficient	560
Not sufficient because duplicate	20

Please call Tiffany Olsen, Head, Data Entry and Signature Verification at (562) 462-2376 if you have any questions regarding the signature verification of this petition.

Sincerely,

DEAN C. LOGAN  
Registrar-Recorder/County Clerk

## Petition Statistics

6/16/2022 11:51:40AM

INIT TO ADOPT HEALTHCARE WORKERS  
MINIMUM WAGE ORD CULVER CITY

Petition ID:17840

Total Sigs Required	2,854
Total Sigs Submitted	3,344
Total Sample Size	3,344
Total Sigs Verified	3,344

		TOTAL CHALLENGED
OCADD	OUT OF COUNTY ADDRESS	
	Total	1
ADD	DIFFERENT ADDRESS	
	Total	38
AEV	INFO ENTERED BY CIRCULATOR	
	Total	9
CAN	CANCELED	
	Total	11
FP	FATAL PENDING	
	Total	4
MADD	PO BOX/MAILING ADDRESS	
	Total	2
MAX	MAX NUMBER OF TIMES SIGNED	
	Total	20
MS2	PRINTED SIGNATURE	
	Total	3
MSPET	MISSING SIG ON PETITION	
	Total	1
NR	NOT REGISTERED	
	Total	246
OD	OUT OF DISTRICT	
	Total	171
RD	INVALID REGISTRATION DATE	
	Total	5
SIG	MISMATCH SIGNATURE	
	Total	49
TOTAL		560

TOTAL VALID : 2,784