CASE NO. S263972

IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA

PICO NEIGHBORHOOD ASSOCIATION; MARIA LOYA,

Plaintiffs and Respondents,

v.

CITY OF SANTA MONICA,

Defendant and Appellant.

On Review From The Court of Appeal
For the Second Appellate District, Division Eight, Case No. B295935

After an Appeal From the Superior Court For the State of California, County of Los Angeles, Case No. BC616804, Hon. Yvette M. Palazuelos, Judge Presiding

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APPLICATION FOR LEAVE TO FILE AMICI CURIAE BRIEF IN SUPPORT OF APPELLANT; PROPOSED BRIEF OF AMICI CURIAE

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TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Cases **Page**

Statutes

APPLICATION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF APPELLANT

The League of California Cities ("Cal Cities") and California Special Districts Association ("CSDA") seek leave to file the enclosed amicus brief in support of Appellant City of Santa Monica ("City").

Cal Cities is an association of 476 California cities, including the City, united in promoting open government and home rule to provide for the public health, safety, and welfare of their residents, and to enhance the quality of life in California communities. Cal Cities is advised by its Legal Advocacy Committee, which is composed of 24 city attorneys representing all regions of the State. The committee monitors appellate litigation affecting municipalities and identifies those cases, such as the instant matter, that are of statewide significance.

CSDA is a California non-profit corporation consisting of over 900 special district members throughout California that was formed in 1969 to promote good governance and improved core local services through professional development, advocacy, and other services for all types of independent special districts. These independent special districts provide a wide variety of public services to urban, suburban, and rural communities, including water supply, treatment and distribution, sewage collection and treatment, fire suppression and emergency medical services, recreation and parks, security and police protection, solid waste collection, transfer,

recycling and disposal, library, cemetery, mosquito and vector control, road construction and maintenance, pest control and animal control services, and harbor and port services. CSDA is advised by its Legal Advisory Working Group, composed of attorneys from all regions of the state with an interest in legal issues related to special districts. CSDA monitors litigation of concern to special districts and identifies those cases that are of statewide or nationwide significance. CSDA had identified this case as having statewide significance for independent special districts.

Numerous Cal Cities and CSDA members have followed the procedures of the CVRA and the Elections Code in converting their at-large elections to district elections. In explaining their decisions to convert, many city and district officials have expressed concern about the significant attorney fees that can be awarded in CVRA litigation. In some instances, city and district officials have expressed a preference for retaining at-large systems and a belief that these at-large systems did not dilute protected-class voting strength, and yet have explained that they felt compelled to change because of uncertainty regarding application of the CVRA and the potentially large exposure to plaintiff's attorneys' fees if they lost. The Amici believe this Court would benefit from a full description of the practical concerns—including those unrelated to the merits of CVRA claims—that may guide or have guided agencies' decisions to switch to by-district elections.

Here, the City received a written demand alleging its long-standing, voter-approved at-large city council elections violate the CVRA. The City did not agree to the demand and this litigation followed. This case became one of only a few CVRA cases to go to trial and to result in appellate precedent. Now before this Court, the case presents important issues that have yet to be finally resolved in California.

Because of this case's potential to become seminal precedent, Cal Cities and CSDA submit this proposed amicus brief to be heard on the important issues regarding application of the CVRA. Currently, there is very limited California precedent regarding the CVRA's application, including the elements of a violation and how they apply to cities and independent special districts, especially those in which the protected-class population at issue is fairly low and unconcentrated. Cal Cities and CSDA agree with the City's positions on these legal issues, and urge the Court to address and resolve these issues to provide their members with clarity regarding the CVRA's application so that decisions to abandon voter-selected, at-large election systems can be made on the basis of the law, not uncertainty regarding its application and fear of economic consequences.

No party in this action authored this brief in whole or in part. Nor did any party or person contribute money toward the research, drafting, or preparation of this brief, which was authored entirely on a pro bono basis by the undersigned counsel.

Dated: June 11, 2021

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AMICI CURIAE BRIEF IN SUPPORT OF APPELLANT

I. INTRODUCTION

The California Voting Rights Act ("CVRA") is a consequential state statute that seeks to eliminate structural discrimination in local elections. Building from the Federal Voting Rights Act ("FVRA") and its well-developed case law, the CVRA provides a cause of action when elections are shown to be characterized by racially polarized voting ("RPV")[1] that results in the dilution of the voting strength of protected classes.[2] (Elec. Code, §§ 14027, 14028(a).) When these circumstances are present, the CVRA provides a judicial mechanism for compelling agencies to convert from at-large[3] to by-district[4] elections—a civil action that may be brought by any member of a protected class who resides within the agency's jurisdiction. (*Id.*, § 14032.)

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[1] The CVRA defines racially polarized voting as "voting in which there is a difference, as defined in case law regarding enforcement of the [FVRA] in the choice of candidates or other electoral choices that are preferred by voters in a protected class, and in the choice of candidates and electoral choices that are preferred by voters in the rest of the electorate." (Elec. Code, § 14026(e).)

[2] Under the CVRA, a protected class is "a class of voters who are members of a race, color, or language minority group, as this class is referenced and defined in [the FVRA]." (Elec. Code, § 14026(d).)

[3] At-large elections are elections in which all voters within a jurisdiction elect the members of the governing body. For instance, when there are open seats on a city council, voters may vote for two candidates. (Elec. Code, § 14026(a).)

[4] By-district elections are elections in which voters vote for only one candidate from the district in which they reside. (Elec. Code, § 14026(b).)

The CVRA was enacted in 2002.[5] Under statutory provisions added in 2016, agencies threatened with potential CVRA lawsuits were afforded the ability to avoid litigation by voluntarily converting to by-district elections within a specified timeframe.[6] (See generally *id.*, § 10010). Many of the agencies since threatened with CVRA lawsuits have chosen this option. When they voluntarily convert, agencies' exposure to attorney fees is capped at about $33,000.[7] Aware of well publicized accounts of seven-figure attorney-fee awards and settlements in earlier CVRA cases, agencies have largely concluded that accepting this cap is preferable to the considerable potential financial exposure of defending their at-large elections, even when there is insufficient evidence of a CVRA violation.

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[5] One demographer estimates that as of May 2020, 126 cities and 27 independent special districts had converted to by-district elections following the CVRA's enactment. Executive orders issued in the Spring of 2020 suspended CVRA deadlines in light of the COVID-19 emergency. (Governor's Exec. Order Nos. N-34-20 (Mar. 20, 2020), N-48-20 (Apr. 9, 2020).) Agencies have, nonetheless, continued to receive written demands during this emergency threatening CVRA lawsuits.

[6] This legislation was motivated, in part, by a concern regarding the serial filing of CVRA lawsuits for financial gain. (Assem. Com. on Elections and Redistricting, Rep. on Concurrence in Senate Amendments, AB 350 (2015-16 Reg. Sess.) Aug. 29, 2016, p. 4.) Under this legislation, agencies that intend to convert to by-district elections must adopt a resolution expressing their intention before or within 45 days of receiving a letter demanding conversion. (Elec. Code, § 10010(e)(3).) Thereafter, agencies have up to 180 days to hold five hearings to receive public input, consider draft district maps and election sequences, and approve final by-district election systems. (*Id.*, § 10010(a)-(b), (e)(2)(B)-(C).)

[7] The initial cap was set at $30,000 in 2016. It is adjusted annually for inflation. (Elec. Code, § 10010(f)(3).)

In this case, after receiving written notice of the Plaintiffs' intention to file a CVRA lawsuit, Appellant City of Santa Monica ("City") declined to convert to by-district elections. With a population over 90,000, the City is one of the few California cities that has chosen to defend its at-large elections.

Because the City declined to convert, this action ensued and the case proceeded to trial. After the superior court determined that the City's at-large elections violated the CVRA, it ordered the City to convert to by-district elections and, without any public process, ordered the City to implement the district maps drawn by the Plaintiffs' expert.

The City appealed to the Second District Court of Appeal. That court reversed, first determining that vote dilution is an element of proof of a CVRA claim in addition to proof of RPV. The court then found the Plaintiffs had failed to prove vote dilution. The court observed the protected class in the case would only make up 30% in one city-council district if the City switched to district elections, as compared to the 14% of the voting population citywide. As a result, significant majority cross-over voting would remain required within the district to give the protected class any meaningful influence over electoral outcomes in the district. But the Plaintiffs' theory of the case was that such cross-over voting did not exist, meaning that the increase to 30% of voting population in the district would not realistically change the results of City elections.

For the reasons the City amply describes in its Answer Brief, this Court should affirm the court's conclusion that the Plaintiffs have failed to prove vote dilution. The standard the City articulates concerning proof of vote dilution comports with the text and legislative intent of the CVRA and would provide an objective, administrable standard for agencies to follow when presented with demands to convert to by-district elections. Importantly, this standard would also reduce—though not eliminate—the incentive for agencies to convert solely out of concerns unrelated to the merits of a CVRA claim.

As the Amici explain within, agencies that employ at-large elections can have legitimate, non-discriminatory reasons for preferring that method over district elections. When RPV and vote dilution are present in such elections, the Amici agree that agencies must necessarily convert to something other than at-large elections pursuant to the CVRA. The Amici remain concerned, however, that many agencies choose to convert to by-district elections purely for the prophylactic concern of limiting attorney-fee exposure. The Amici explain this concern within to assist this Court in understanding the practical issues agencies face when confronted with demands to convert to by-district elections. The Amici are hopeful this discussion will amplify the points and authorities the City offers in support of its positions.

II. ARGUMENT

At-large elections are an historical method for electing local officials. Such elections have been common in local jurisdictions in California for over a century, having been implemented as a Progressive Era reform. (Inst. for Loc. Gov., Picture Yourself in Local Government, Unit 1: Where Did Our Local Governments Come From,[8] p. 4.) Concerned about the power special interests had over government officials, reformers believed at-large elections would weaken partisan interests and diminish parochial decision-making. (Hajnal et al., Municipal Elections in California: Turnout, Timing, and Competition,[9] Pub. Policy Inst. of Cal.. 2002, p. 20.)

On its face, California law does not prefer at-large or by-district elections. Absent the circumstances defined in the CVRA, state law leaves it to local agencies and their voters to determine the method for electing local officials. (See Gov. Code, § 34871 [implicitly recognizing the validity of at-large methods of election and authorizing city councils to submit the issue of converting to by-district elections to voters]; *id.*, §§ 10508, 10650 [providing that the principal act governing independent special districts local agencies shall determine whether at-large or by-

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[8] https://www.ca-ilg.org/sites/main/files/file-attachments/unit_1.pdf?1564533410 (accessed on June 6, 2021).

[9] https://www.ppic.org/content/pubs/report/R_302ZHR.pdf (accessed on June 6, 2021).

district elections are required, but authorizing the districts to convert to by-district elections].[10])

To be sure, some cities and independent special districts had implemented by-district elections even before enactment of the CVRA. Cal Cities' and CSDA's members have differing reasons for favoring their respective methods of elections. Those that favor at-large systems often believe, for instance, that elected officials make better decisions when they do not feel constrained to consider how decisions impact just one portion of a city or district.[11] A key concern expressed when considering conversion to district elections is that "ward politics"—decision-making alleged to favor individual officials' districts, rather than the city or district as a whole—may result. Some also suggest "log-rolling," the practice of elected officials supporting other officials' proposals or initiatives in

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[10] See also, for charter cities, article XI, section 5 of the California Constitution, which expressly declares the "conduct of elections" a municipal affair generally reserved for charter cities to regulate in their sole discretion. The CVRA only prevails over contrary municipal law to the extent vote dilution is shown. (See *Jauregui v. City of Palmdale* (2014) 226 Cal.App.4th 781, 799.)

[11] Relatedly, some believe at-large voting systems provide greater opportunities for voters to relate to, and feel represented by, at least one of their representatives. With a five-member council, voters effectively have five chances of electing a councilmember who will represent their values. In a by-district system, voters effectively have one chance, depending on how the district votes each four years. If the by-district election is contentious and divided, voters may feel unrepresented if the preferred candidate from their district is not elected, and this may cause them to believe they are without recourse to ensure someone else addresses their concerns.

exchange for reciprocal benefits, is more prevalent in by-district systems. Such decision-making is further thought to lead to factionalized processes that divide the budgets for specific projects into equal shares by district, rather than prioritizing resources by the greatest need.

In contrast, agencies that favor by-district elections believe such a method is more, not less, representative. Officials serving districts may feel their connections to distinct communities allows them to better represent those communities' interests by identifying and responding to their unique issues and interests. Under this view, a city or district is benefitted as a whole when all constituencies believe they have a voice in city or district governance. Many officials in by-district systems may strongly disagree their elections lead to ward politics, log-rolling, or inefficient resource allocation.

Ultimately, the considerations that determine whether at-large or by-district election are preferred, and the arguments for and against each system, are varied and dynamic. It is surely for this reason that, absent the circumstances the CVRA proscribes, California law has remained neutral as to which method of election agencies must adopt. Implicitly, state law has recognized that decisions concerning methods of election generally should be made through local democratic processes in which elected representatives weigh the competing factors and make the best decisions for their unique communities.

Cal Cities and CSDA recognize that such neutrality must, of course, yield when RPV and vote dilution exist within a local election system. The Amici strongly believe an effective remedy should exist when at-large voting systems are found to diminish the rights of protected classes in violation of the CVRA. The Amici are concerned, however, that their members have often decided to convert to by-district elections for reasons unrelated to the requirements or goals of the CVRA.

As many city and district officials have observed, the cost of losing CVRA lawsuits could be overwhelming to municipal budgets. The Plaintiffs in this case have filed an attorney-fee request for more than $20 million. The few CVRA cases that have gone to trial or settled have also resulted in widely reported attorney-fee payments well into seven figures.[12] Because of the potential for such substantial awards, agencies have often concluded there is too much risk involved in defending their at-large

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[12] See, e.g., Molly Sullivan, Folsom could soon make a significant change in how voters elect City Council members, Sacramento Bee, Jan. 15, 2021 (noting plaintiffs in CVRA litigation had been awarded $1 million to $5 million for their attorney fees); Aldo Toledo, Santa Clara loses appeal to overturn court-ordered district election system, The Mercury News, Jan. 4, 2021 (noting the plaintiff in a recent CVRA court case was awarded $3.3 million for its attorney fees through trial); Phil Willon, A voting law meant to increase minority representation has generated many more lawsuits than seats for people of color, Los Angeles Times, Apr. 9, 2017 (noting a settlement of a CVRA lawsuit involved a $4.5 million payment to plaintiff counsel).

systems—even when there may be meritorious defenses.[13] A typical city with a population of 50,000, for example, could hardly withstand the financial impact of an unsuccessful CVRA defense. According to the California State Controller's Office Local Government Financial Data (available at www.ByTheNumbers.sco.ca.gov), California's 1,924 independent special districts have a median total annual revenue of $695,228, with fully one quarter of the state's independent special districts having annual revenue of less than $130,000. Even if the risk of losing a CVRA lawsuit is considered low, the cost of being wrong is usually thought to be so drastic that even minimal risk is perceived as too much.

Thus, although state law is neutral on its face as to how local agency officials may be elected, neutrality is far from the practice effected by the CVRA's current vague standards. The reality is that mere threats of CVRA lawsuits are often enough to compel the conversion from at-large to by-district elections. Effectively, a precautionary principle of sorts has developed: many agencies, particularly ones serving small and midsize

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[13] See, e.g., City of Barstow Ordinance No. 956-2018U, available at: https://library.municode.com/ca/barstow/ordinances/code_of_ordinances?nodeId=911139; City of Ojai Ordinance No. 889, available at: https://drive.google.com/file/d/1N29kT_G5iIMMDOUqLfGxOV0mqQA_FGA5/view; City of South Pasadena Ordinance No. 2318, available at https://opengov.southpasadenaca.gov/WebLink/DocView.aspx?dbid=0&id=90681&page=4&cr=1; City of Elk Grove Reso. 2019-191, available at: http://www.elkgrovecity.org/UserFiles/Servers/Server_109585/File/City%20Government/City%20Clerk/Resolutions/2019/08-28-19_10.3_2019-191.pdf.

communities, have concluded that if there is *any* risk of exposure to CVRA attorney fees, the potentially disastrous financial impact of such exposure requires abandoning any defense of their at-large elections. For solely financial reasons, agencies have accordingly undertaken rapid and fundamental changes in the relationship between their elected officials—often doing so after receiving form demand letters that appear to have been "cut and pasted" from letters delivered to other agencies.

This trend is likely to continue unless this Court articulates a clear, administrable standard for determining when RPV and vote dilution are occurring in violation of the CVRA. As of this filing, many of the more populous cities and independent special districts have completed conversions to by-district elections. Going forward, with the stock of larger-agency defendants diminished, CVRA plaintiffs are likely to shift their focus to smaller cities and districts. While such agencies face the same, if not greater, financial concerns as larger agencies, they would also face an additional and unique practical concern that larger agencies do not. Specifically, under by-district election systems, smaller agencies may have trouble fielding competitive elections.

The hundreds of cities and independent special districts with small populations already have difficulties attracting candidates for their councils or boards. In some cases, the number of candidates has barely exceeded the number of open seats. In other cases, seats have gone unfilled due to a lack

of candidates, and local elected offices are filled by appointment. (See Elec. Code, § 10515(b) [providing for appointment of local officials when no candidacy was declared for an elective office].)

Because of many agencies' small populations, agencies may find it more difficult to attract competitive races with by-district elections. Consider a city with a population of 5,000 residents. By law, such a city would either need to convert to five elected council districts or four council districts with an at-large elected mayor. (See Gov. Code, §§ 34871, 34886.) If the former option is chosen, competitive elections would not exist unless at least two candidates ran in each open district (of approximately 1,000 residents, and often significantly lower numbers of registered voters). With staggered election cycles,[14] this would require that at least six candidates run when three seats are open and four when two seats are open. At least two candidates per district would also need to run in districts that may each be geographically very small, in some cases consisting of only single subdivisions or groups of a few city streets or blocks. If the city retained its at-large elections, in contrast, competitive races could still exist with four candidates (three seats open) or three candidates (two seats open) running from throughout the city's territory.

The difficulty in attracting competitive races under a by-district system could be more acute with independent special districts. Many such

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[14] See Gov. Code, § 34880(b).

districts—such as park and recreation districts, fire protection districts, water districts, and health care districts—serve special and limited purposes. Many of those districts already have difficulties attracting more candidates than open director seats in their elections. Dividing these agencies into electoral districts would likely result in even greater burdens in securing candidates, leading to more offices being filled by appointment. The practical effect of creating districts is that these agencies' elections could become less, not more, democratic.

Cal Cities and CSDA emphasize that they fully support the goals of the CVRA and strongly agree that a remedy must exist to address structural discrimination in local elections. The Amici offer these practical observations, therefore, not in an effort to diminish the CVRA's importance, but to highlight their concerns about the impacts the CVRA has had in rapidly changing the local electoral landscape. When RPV and vote dilution exist, the need for an efficacious remedy to compel fair and equal elections is beyond dispute. But absent the presence of such circumstances, agencies should be free to preserve the longstanding political relationships that exist between their voters and elected officials. This is especially the case given the difficulties small cities and independent special districts would likely experience in administering competitive by-district elections.

The Amici's position, overall, is that relationships between voters and elected officials should not be abandoned solely out of concerns for

financial exposure, as is often the practice currently. The City has persuasively argued that vote dilution is a required element of proof in CVRA litigation and it has articulated a standard for measuring vote dilution that is consistent with the CVRA's text and legislative intent. As the push to compel conversions to by-district elections moves toward smaller cities and independent special districts, the need for clarity on the vote-dilution standard becomes even greater. Although a favorable ruling on this subject will not stop local agencies from continuing to rely on prophylactic concerns in choosing to convert to by-district elections, such a ruling will better enable decisions based on the merits, rather than on purely financial concerns.

III. CONCLUSION

This case provides an opportunity for this Court to provide needed clarity regarding the CVRA's application. For the reasons the City has advocated, this Court should affirm the Court of Appeal's decision.

Dated: June 11, 2021

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CERTIFICATE OF COMPLIANCE PURSUANT TO CALIFORNIA RULES OF COURT RULE 8.504(d)(1)

Pursuant to California Rules of Court Rule 8.504(d)(1), I certify that according to Microsoft Word the attached brief is proportionally spaced, has a typeface of 13 points and contains 3,805 words.

Dated: June 11, 2021

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PROOF OF SERVICE

City of Santa Monica v. Pico Neighborhood Association, et al.
California Supreme Court Case No. S263972

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Placer, State of California. My business address is 2281 Lava Ridge Court, Suite 300, Roseville, CA 95661.

On June 11, 2021, I served true copies of the following document(s) described as

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on the interested parties in this action as follows:

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BY ELECTRONIC SERVICE: I electronically filed the document(s) with the Clerk of the Court by using the TrueFiling system. Participants in the case who are registered TrueFiling users will be served by the TrueFiling system. Participants in the case who are not registered TrueFiling users will be served by mail or by other means permitted by the court rules.

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

Executed on June 11, 2021, at Roseville, California.

/s/ Kirsten Morris
Kirsten Morris

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