

Contents

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I. INTRODUCTION..... 3

II. FACTS..... 3

 A. Ashby’s Ballot Designation Worksheet..... 3

 B. Ashby’s Occupation is a City Councilmember..... 4

 C. Ashby Earns No Income as a “Women’s Advocate.” 5

 D. Ashby Has Never Recused Herself As a “Women’s Advocate.” 6

 E. Ashby Has Never Identified Herself as a Women’s Advocate in Any Other Context. 7

III. ASHBY’S BALLOT DESIGNATION IS IMPROPER. 7

 A. The Court Must Base Its Decision on Ashby’s Ballot Designation Worksheet. 9

 B. Ashby Cannot Claim to be a Women’s Advocate Based on Her City Council Work. 9

 C. Ashby’s Profession or Occupation as a “Women’s Advocate” Cannot Be Justified By Her Consulting Company. 10

 D. Ashby’s Late-Breaking Claims of Being a “Women’s Advocate” are Not Credible. 11

 E. Ashby’s Use in Her Ballot Designation of the Term “Councilmember” Is Not an Accurate and Complete Description of Her Current Occupation. 12

IV. EXPEDITED RELIEF IS NECESSARY 12

V. CONCLUSION 13

1 **I. INTRODUCTION**

2 This petition challenges Angelique Ashby’s (“Ashby”) ballot designation. In the June 7,
3 2022, Primary Election, Ashby was the runner-up in the election for the California State Senate, 8th
4 District, entitling her to advance to the General Election on November 8, 2022. In the Primary
5 Election, Ashby correctly listed as her ballot designation: “Sacramento City Councilwoman.” But,
6 on June 24, 2022, the United States Supreme Court issued its opinion in *Dobbs v. Jackson Women’s*
7 *Health Organization*, overturning *Roe v. Wade* and nearly 50 years of precedent protecting
8 Women’s reproductive rights. The result energized women voters around the issue. Seeking to
9 capitalize on the political environment, Ashby sought to change her ballot designation to
10 “Councilmember/Women’s Advocate.” But Ashby’s ballot designation is false, misleading, and
11 contrary to the law. The reality is that Ashby’s sole profession, vocation, and occupation, is as a
12 member of the Sacramento City Council. Her mandatory Statement of Economic Interests disclose
13 no other source of income than her City Council salary. And indeed, Ashby has herself testified
14 under oath that she gave up her other work activities once she joined the City Council because she
15 “just [doesn’t] have enough time to do both.” Because her ballot designation is false, misleading,
16 and improper, it should be stricken.

17 **II. FACTS**

18 Angelique Ashby was the runner-up for the California State Senate, 8th District in the June
19 7, 2022, Primary Election. During the June Primary, Ashby’s ballot designation was “Sacramento
20 City Councilwoman.” However, at the last possible moment, Ashby requested a new designation
21 for the General Election, “Councilmember/Women’s Advocate.”

22 **A. Ashby’s Ballot Designation Worksheet**

23 Pursuant to the Elections Code, candidates for office must submit a worksheet that justifies
24 the use of their requested ballot designation. (Elec. Code, § 13107.3.) Ashby’s justification for her
25 ballot designation of “Women’s Advocate” is on her ballot designation worksheet: “I have
26 advocated for women’s pay, healthcare & housing equity during my time on the City Council.
27 Additionally, my consulting firm has focused on programs for women w/barriers to success, incl.
28

1 incarcerated women.” (Fink Decl., Ex. W.) As demonstrated below, this was Ashby’s very first
2 mention of women’s programs in reference to her consulting business.

3 In reality, however, Ashby’s claim that her principal occupation is that of a “Women’s
4 Advocate” is contrary to the facts and law governing ballot designations. .

5 **B. Ashby’s Occupation is a City Councilmember.**

6 Ashby is a member of the Sacramento City Council, and currently serves as Vice Mayor.
7 Although Ashby may have advocated on behalf of women on the City Council, that is not her job.
8 Rather, managing the affairs of the city is her job as a City Councilmember.

9 Sacramento City Councilmembers get paid an amount equivalent to full-time employees,
10 with councilmembers earning \$96,257 per year. ([https://fox40.com/news/local-news/sacramento-
11 mayor-council-members-to-get-salary-raise/](https://fox40.com/news/local-news/sacramento-mayor-council-members-to-get-salary-raise/))¹ In 2021, Ashby earned total pay of \$96,714 and
12 overall total pay and benefits amounting to \$122,706.16. (See
13 <https://transparentcalifornia.com/salaries/2021/sacramento/angelique-v-ashby/>)² Since her
14 election to the Sacramento City Council, Ashby has worked principally as a member of the City
15 Council. Ashby has testified under oath that she started a business in 2004 with her father but
16 although she “still own[s] that firm, [she doesn’t] spend a lot of time on it because [she] spend[s]
17 so much time in [her] city council duties.” (Fink Decl., Ex. M.) Ashby made clear that since
18 joining the City Council, she does “some very limited work because [she] just [doesn’t] have
19 enough time to do both. The majority of [her] workday is spent on District One and Sacramento
20 City Council.” (Fink Decl., Ex. M.)

21 Ashby’s full-time work on the City Council is borne out by her financial disclosures. As a
22 member of the Sacramento City Council, Ashby is required to file a FPPC Form 700 Statement of
23 Economic Interests (“Form 700”). (Sacramento Mun. Code, § 4.02.090 [“All city employees shall
24 follow the Political Reform Act and Fair Political Practices Commission regulations issued
25 thereunder, as applicable.”].) In addition, as a member of the City Council, Ashby serves on the

26 _____
27 ¹ For example, full-time state legislators earn only \$119,702.
(<https://www.calhr.ca.gov/cccc/pages/cccc-salaries.aspx>.)

28 ² Although not itself a public record, Transparent California is considered generally reliable and its
data is drawn from public records.

1 board of a number of local agencies and joint powers authorities requiring that her disclosures cover
2 all of Sacramento and Sutter County. Since assuming office on the Sacramento City Council,
3 Ashby has disclosed no income other than the income received as a member of Sacramento City
4 Council. (Fink Decl., Exs. A-K [Ashby's Form 700s from her service on the Sacramento City
5 Council are attached hereto as Exhibits A-K and incorporated as if fully set forth herein].) As a
6 candidate for State Senate, Ashby was required to file a Form 700. Ashby has disclosed no income
7 other than the income received as a member of Sacramento City Council. (*Id.*, Ex. L [Ashby's
8 Form 700s related to her seeking the office of State Senator].) Indeed, the only economic interest
9 that she discloses other than her spouse's income, her home, and her City Council salary is her
10 ownership interest in Ashby Consulting Group, LLC. While Ashby claims to retain an ownership
11 interest in that business, since being elected to the City Council, Ashby has disclosed each year that
12 she has received less than \$500 in income (and possibly no income from the business). (Exs. A-
13 L.)

14 **C. Ashby Earns No Income as a "Women's Advocate."**

15 Ashby's late-breaking claims to be a "Women's Advocate" are based on her work for her
16 consulting business, which she admits she doesn't "spend a lot of time on [] because [she] spend[s]
17 so much time in [her] city council duties," and that her work on those matters is "very limited."
18 (Fink Decl., Ex. M.)

19 Even if Ashby were engaged in her consulting business, she has made clear that her business
20 is not in the field of women's advocacy. Rather, Ashby Consulting Group "build[s] programs for
21 populations with barriers to success, mostly parolees and foster youth who are aging out of the
22 system." (*Ibid.*) Ashby has previously explained on her own blog that while working at Ashby
23 Consulting Group, she "buil[t] best practice model programs that serve populations with barriers to
24 success." (Fink Decl., Ex. N.) A similar description of her firm can be found on Ashby's LinkedIn
25 page, which simply describes the company as a "[c]onsulting firm focused on implementation of
26 best practice social programs for populations with barriers to success." (Fink Decl., Ex. V.) Indeed,
27 Ashby's late-breaking and revised description of the work of her consulting firm does not even
28 support her new ballot designation. She merely claims on her ballot designation worksheet filed

1 with the County Registrar of Voters Office that “her firm has focused” on “programs.” (Fink Decl.,
2 Ex. W.) Ashby in her ballot designation worksheet never even claims that the firm engages in
3 advocacy. Ashby’s ballot designation worksheet, which is what the Secretary of State uses to
4 determine the ballot designation, fatally fails to support her claim that she engages in advocacy.

5 In addition, Ashby’s ballot designation worksheet never contends that she performed the
6 work she now claims her consulting firm does on women’s programs. She has only ever claimed
7 to own the business. That would be like Vivek Ranadivé claiming to be a basketball player because
8 “his company” (the Sacramento Kings) focuses on playing and winning basketball games. In the
9 portion of the ballot designation worksheet where Ashby is asked to justify her claim that her
10 principal occupation is “Women’s Advocate”, she says her title is “Councilmember/owner”. (Fink
11 Decl. Ex. W.) She only claims to own the company, not perform the work herself. Ashby’s own
12 justification on the ballot designation worksheet for claiming to be a Women’s Advocate admits
13 that her title is “Councilmember/owner”, and that her title is not “Women’s Advocate” ³

14 **D. Ashby Has Never Recused Herself As a “Women’s Advocate.”**

15 The Form 700s required by the Political Reform Act and the City of Sacramento’s Code of
16 Ethics are designed to allow a public official to disclose to the public conflicts of interest that might
17 require disqualification and for the public official to recuse herself from consideration of a matter
18 where she may have a conflict of interest. (See Gov. Code, § 87105.)

19 Under the Sacramento City Council Rules of Procedure, a councilmember “shall not vote
20 upon a matter if the member is disqualified from voting on that matter due to a conflict of interest.”
21 (City of Sacramento Rules of Procedure, Ch. 8, § H.2.a.) “A member who is abstaining due to a
22 financial conflict of interest shall publicly identify the financial interest in detail sufficient to be
23 understood by the public.” (*Id.*, Ch. 8, § H.2.c.) Ashby has never identified a financial conflict of
24 interest from her purported work as a “women’s advocate” and has never abstained or recused

25 _____
26 Petitioner learned after the Petition was filed that the “Occupation” listed on Ashby’s Candidate
27 Statement Form is different than what is listed on her Ballot Designation Worksheet. (Compare
28 Fink Decl. Ex W with Fink Decl., Ex. X.) Her candidate statement form lists her occupation as
“Councilmember/Small Businessowner/Women’s Advocate” The Court’s order on this petition
should require that the occupation on Ashby’s candidate statement conform to her ballot
designation.

1 herself from any vote based on a conflict of interest from her purported work as a “women’s
2 advocate.”

3 **E. Ashby Has Never Identified Herself as a Women’s Advocate in Any Other Context.**

4 Ashby contributes funds to political causes and campaigns but has not identified herself as
5 a women’s advocate on campaign contribution disclosures. Rather, she refers to herself solely as
6 a council member or Vice Mayor. On January 11, 2021, Ashby contributed \$30 to the California
7 Democratic Party (“CDP”) through Act Blue. Ashby listed “Councilmember” as her occupation
8 and “CITY OF SAC” as her employer. She made no mention of “women’s advocate.” (Fink Decl.,
9 Ex. O.) On May 1, 2022, Ashby contributed \$250.00 to Davis College Democrats PAC. Ashby
10 listed “Vice Mayor of Sacramento” as her occupation and “City of Sacramento” as her employer.
11 (*Id.*, ¶ P.) On June 30, 2022, Ashby contributed \$100.00 to Retirees for Walker for CalPERS Board
12 2022. Ashby listed “Councilmember” as her occupation and “City of Sacramento” as her employer.
13 (*Id.*, Ex. Q.)

14 Ashby’s biographies on her social media profiles describe her as a Councilwoman, partner
15 at a consulting firm, law school graduate, graduate of UC Davis, and a mom. There is no mention
16 of being a “women’s advocate” in any of her social media biographies. (Fink Decl., ¶¶ R [Ashby’s
17 official Facebook profile as Vice Mayor]; S [Ashby’s personal Facebook profile]; T [Ashby’s
18 official Instagram profile]; U [Ashby’s campaign Instagram profile].)

19 Ashby’s LinkedIn page does not indicate any activity as a “Women’s Advocate.” Her
20 LinkedIn site lists only two professional experiences: her tenure on the Sacramento City Council
21 and her interest in Ashby Consulting Group, LLC. Her reference to Ashby Consulting Group LLC
22 does not reference any work as a “Women’s Advocate.” Rather, it simply describes the company
23 as a “[c]onsulting firm focused on implementation of best practice social programs for populations
24 with barriers to success.” (Fink Decl., Ex. V.)

25 **III. ASHBY’S BALLOT DESIGNATION IS IMPROPER.**

26 Pursuant to Elections Code section 13314(a)(1), “any elector may seek a writ of mandate
27 alleging that an error or omission has occurred, or is about to occur, in the placing of any name on,
28 or in the printing of, a ballot, sample ballot, voter pamphlet, or other official matter....” Here,

1 Ashby's designation is improper because her proposed ballot designation is not an accurate
2 description of her "profession, occupation, or vocation" and would mislead the voters.

3 Section 13107(a) of the Elections Code permits a candidate to use one of four possible ballot
4 designations. The one at issue here is: "no more than three words designating either the candidate's
5 current principal professions, occupations or vocations or the principal professions, occupations or
6 vocations of the candidate during the calendar year immediately preceding the filing of nomination
7 documents." (Elec. Code, § 13107, subd. (a).) The Secretary of State has adopted regulations
8 further defining the permissible ballot designations that candidates may use. (Cal. Code Regs., tit.
9 2, § 20710 et seq.) The Secretary of State's regulations define the term "principal" for purposes of
10 a "principal profession, occupation, or vocations" for ballot designations:

11 "Principal," as that term is used in Elections Code Section 13107,
12 subdivision (a)(3), means a substantial involvement of time and effort such
13 that the activity is one of the primary, main or leading professional,
14 vocational or occupational endeavors of the candidate. The term
15 "principal" precludes any activity which does not entail a significant
16 involvement on the part of the candidate. Involvement which is only
17 nominal, pro forma, or titular in character does not meet the requirements
18 of the statute.

19 (Cal. Code Regs., tit. 2, § 20714, subd. (b) [emphasis added].)

20 Regulation 20714(c) requires a proposed principal profession, vocation or occupation
21 submitted pursuant to Section 13107(a)(3) of the Elections Code be factually accurate, descriptive
22 of the candidate's principal profession, vocation or occupation, and must be neither confusing nor
23 misleading. Section 13107(e)(1) of the Elections Code prohibits the use of any ballot designation
24 which "[w]ould mislead the voter."

25 "A major purport of the Elections Code is to insure the accurate designation of the candidate
26 upon the ballot in order that an informed electorate may intelligently elect one of the candidates."
27 (*Salinger v. Jordan* (1964) 61 Cal.2d 824, 826.) A candidate may not "'creatively' misuse the
28 ballot designation." (*Andrews v. Valdez* (1995) 40 Cal.App.4th 492, 495.) The central
characteristic of a profession, vocation or occupation . . . is its attribute as a "means of livelihood
or production of income." (*Andal v. Miller* (1994) 28 Cal.App.4th 358, 365.)

1 Ashby's ballot designation "Councilmember/Women's Advocate" is contrary to law,
2 including but not limited to Section 13107 of the Elections Code and Sections 20714, and 20716
3 of the California Code of Regulations.

4 **A. The Court Must Base Its Decision on Ashby's Ballot Designation Worksheet.**

5 As the Elections Official, the Secretary of State was obligated to determine whether Ashby's
6 ballot designation was proper, based on the ballot designation worksheet. (Elec. Code, § 13107.3.)
7 The very purpose of the worksheet is for the elections official to make a determination of whether
8 the ballot designation is proper. Failing to submit a worksheet would require that the elections
9 official deny the candidate any ballot designation. (*Id.*, subd. (c).) Ashby is therefore limited to
10 the justification she provided on the worksheet.

11 **B. Ashby Cannot Claim to be a Women's Advocate Based on Her City Council Work.**

12 "A public officer is impliedly bound to exercise the powers conferred on him with
13 disinterested skill, zeal, and diligence and primarily for the benefit of the public." (*Clark v. City of*
14 *Hermosa Beach* (1996) 48 Cal.App.4th 1152, 1170, as modified on denial of reh'g (Sept. 11,
15 1996).) Ashby's attempt to convert her service on the City Council from one serving the public to
16 one advocating for only a portion of the public is improper. Her effort to figuratively double-dip
17 on her council work is a "creative[] misuse" of the ballot designation. (*Andrews v. Valdez, supra*,
18 40 Cal.App.4th at p. 495.) Courts have rejected similar such efforts. In *Andal v. Miller*, a State
19 Senator attempted to justify his ballot designation of "Senator/Peace Officer" by claiming that his
20 "past 20 years in the legislature has [sic] been dedicated to that profession. I intend to continue to
21 be involved in law enforcement even after I leave the legislature." (*Andal v. Miller, supra*, 28
22 Cal.App.4th at p. 363.)⁴

23 Attempting to double-dip on her City Council work also circumvents the requirement that
24 the ballot designation state the candidate's "means of livelihood or production of income." (*Andal*
25 *v. Miller, supra*, 28 Cal.App.4th at p. 365.) To the extent that Ashby is advocating for women as a
26 city councilmember, she cannot earn income from sources outside the city council including her

27 _____
28 ⁴ Ultimately, the court of appeal rejected the candidate's proposed ballot designation for numerous reasons, but this was one of the many justifications rejected by the court.

1 consulting business for work she is doing as a city councilmember, any more than she could earn
2 money from the Chamber of Commerce for advocating for businesses or from real estate developers
3 for advocating for their projects as a city councilmember., Whatever she earns on the City Council
4 cannot be supplemented by outside income for advocating on behalf of certain interests while
5 performing her council related work, without running afoul of numerous ethics rules and anti-
6 corruption laws.

7 **C. Ashby's Profession or Occupation as a "Women's Advocate" Cannot Be Justified By**
8 **Her Consulting Company.**

9 Nor can Ashby justify her occupation or profession as a "Women's Advocate" based her
10 work with the consulting company she claims to own. Ashby has testified that she barely puts any
11 time into the company because of her need to focus on her official duties on the City Council. (Fink
12 Decl., Ex. M.) Indeed, as a candidate variously for Mayor and State Senate, she has had even less
13 available time. "Involvement [in a business] which is only nominal, pro forma, or titular in
14 character does not meet the requirements of the statute." (Cal. Code Regs., tit. 2, § 20714, subd.
15 (b); *Andal v. Miller*, supra, 28 Cal.App.4th at p. 366.)

16 Ashby's sworn testimony is bolstered by her twelve years of Form 700s, where she has
17 never disclosed more than \$499 in income from her consulting company—and indeed, appears to
18 have earned zero from that business. (Fink Decl., Exs. A-L.) After 12 years on the City Council,
19 as well as on numerous county-wide board and joint powers agencies, Ashby appears to never have
20 recused herself from a decision before the City Council based on her work as a "Women's
21 Advocate" through her consulting company. One would imagine that a going concern advocating
22 for half of the population of a county of 1.6 million people would at some point generate a conflict
23 of interest.

24 Indeed, even if Ashby's "very limited work" for her consulting company would be enough
25 to count as a "principal" profession or occupation, the business of the Ashby Consulting Group is
26 not advocacy for women. While she claims now that she develops programs for women, her
27 repeated public statements that the company creates programs "mostly [for] paroles and foster
28

1 youth” demonstrates that the mission of the consulting business is not Women’s Advocacy.
2 Moreover, the creation of programs is not “advocacy.”

3 In reality, all of the work that Ashby claims to do for women comes in the context of her
4 service on the City Council. Ashby may point to a 2019 Women’s Roundtable Report—but again
5 that is listed on her official city council website as work she did as a councilmember, not as work
6 she did separately from her work as a city councilmember.

7 **D. Ashby’s Late-Breaking Claims of Being a “Women’s Advocate” are Not Credible.**

8 The Court may disregard Ashby’s self-serving and recent claims of being a “Women’s
9 Advocate.” (See *D’Amico v. Board of Medical Examiners* (1974) 11 Cal.3d 1, 21-22 [Court can
10 ignore self-serving declarations that contradict facts demonstrated in discovery when ruling on a
11 motion for summary judgment].) Here, Ashby’s claim that her “principal” profession is as a
12 “Women’s Advocate” are contradicted by her volumes of financial disclosures, public statements,
13 and sworn testimony to the contrary. Moreover, Ashby has a documented history of
14 misrepresenting her prior occupation and profession. “For years, Ashby has claimed to be a public
15 defender in Sacramento County, but State Bar records indicate she is not an attorney -- and in fact
16 she admits to failing the bar exam.” (Fink Decl., Ex. Y.) Confronted with these misrepresentations
17 of her prior occupation and profession in her 2016 campaign for Mayor, Ashby backed out of an
18 on-camera interview with KCRA. (*Ibid.*) Ashby has admitted that despite her misrepresentations
19 to the contrary, she failed the Bar Examination and was never admitted to practice law, was not a
20 lawyer, and did not work as a public defender. (*Ibid.*; Fink Decl., Ex. M.)

21 Ashby is similarly now misrepresenting her principal occupation as a Women’s Advocate,
22 much as she previously misrepresented that she was a lawyer and worked as a public defender. Her
23 claim to be a “Women’s Advocate” sounds good to an electorate that is outraged over efforts to
24 restrict women’s reproductive rights, but is contradicted by the facts and evidence—including her
25 own prior public statements. While she might be allowed to prevaricate in public discourse, the
26 Elections Code does not allow a candidate to misrepresent one’s occupation on official election
27 materials. A candidate’s ballot designation must be accurate and supported by factual statements.
28 (Elec. Code, § 13107.3.)

1 **E. Ashby’s Use in Her Ballot Designation of the Term “Councilmember” Is Not an**
2 **Accurate and Complete Description of Her Current Occupation.**

3 The Elections Code requires that any ballot designation identifying a candidate’s principal
4 profession, vocation, or occupation be limited to three words. (Elec. Code, § 13107, subd.
5 (b)(1)(c).) The Secretary of State regulations allow for an elected official, such as Ashby, to use
6 her elected office along with any other principal profession, vocation, or occupation, provided “that
7 ballot designation shall be limited to no more than three words” and otherwise complies with the
8 regulations. (Cal. Code Regs., tit. 2, § 20714, subd. (g).) By using “councilmember,” Ashby is
9 misleading the public as to her role as a city councilmember. It is not clear what “council” Ashby
10 is serving on—whether it be a government council (the “Council on Environmental Quality”), a
11 private advocacy/professional council (the “Council on Foreign Relations”), a tribal council, or a
12 city council. Each of the examples listed by the Secretary of State’s regulations with regard to how
13 to describe an elected office include a complete and accurate description of the office involved so
14 as to avoid the voters being misled.

15 For instance, the regulations list “County Supervisor/Teacher,” so as to avoid confusion of
16 the type of Supervisor, and “State Controller/Businessman,” so as to avoid confusion as to the type
17 of controller the candidate serves as. Ashby’s designation of “Councilmember/Women’s
18 Advocate” is improper because it does not properly and sufficiently identify her elected office. The
19 proper designation would be “City Councilmember/Women’s Advocate” (or “Sacramento
20 Councilmember/Women’s Advocate”) which would violate the three-word restriction under both
21 the Elections Code and the Secretary of State’s regulations. Ashby’s selection of the incomplete
22 description of her city council office is intended to circumvent the three-word limitation and should
23 not be permitted.

24 **IV. EXPEDITED RELIEF IS NECESSARY**

25 On September 1, 2022, the Secretary of State will issue a certified list of candidates who
26 are eligible to be voted on in the November 8, 2022, General Election. (Elec. Code, § 8148.) That
27 list will contain the ballot designations of each qualified candidate, to be included on the ballot and
28 in the ballot materials that are published for the election. Petitioner is informed and believes and

1 thereon alleges that Ashby will be included in this list with the ballot designation
2 "Councilmember/Women's Advocate." The Secretary of State's notification stated that: "If you
3 have any issues related to information concerning an opponent, they must be resolved by the
4 Sacramento County Superior Court, which is the exclusive venue for challenges pursuant to
5 Elections Code section 13314(b), no later than the close of business on Wednesday, August 31,
6 2022."

7 Printing Ashby's ballot designation "Councilmember/Women's Advocate" on the
8 November 8, 2022, General Election ballot for the office of State Senator, 8th District, in the official
9 ballot materials distributed for that election would be misleading to voters.
10 "Councilmember/Women's Advocate" is not Ashby's current principal profession, vocation, or
11 occupation.

12 **V. CONCLUSION**

13 For the reasons set forth above, the Court should issue the Writ of Mandate and strike the
14 Ashby's ballot designation of "Councilmember/Women's Advocate," and require her to use her
15 alternative ballot designation of "City Councilwoman" or her primary ballot designation of
16 "Sacramento City Councilwoman."

17
18 Dated: August 30, 2022

BROWER LAW GROUP
A Professional Corporation

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21 By: 
Lee K. Fink

22 Attorneys for Petitioner
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PROOF OF SERVICE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO, GORDON D. SHABER COURTHOUSE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 23601 Moulton Parkway, Suite 220, Laguna Hills, CA 92653.

On August 30, 2022, I served on the interested parties in this action the foregoing documents described as **PETITIONER'S BRIEF IN SUPPORT OF PETITION FOR WRIT OF MANDATE**

<p>Steve Reyes, Chief Counsel sreyes@sos.ca.gov Rachelle Delucchi, Elections Counsel rdelucch@sos.ca.gov Robbie Anderson, Elections Counsel Robbie.Anderson@sos.ca.gov Office of the Secretary of State Elections Division 1500 11th Street, 5th Floor Sacramento, CA 95814 (916) 657-2166 Fax: (916) 653-3214</p>	<p><i>Attorneys for Respondent Shirley Weber, California Secretary of State</i></p>
<p>Gary S. Winuk gwinuk@kaufmanlegalgroup.com Kaufman Legal Group, APC 621 Capitol Mall, Suite 1900 Sacramento, CA 95814 Phone: (213) 452-6568</p>	<p><i>Attorneys for Real Party in Interest Angelique Ashby</i></p>

The document(s) listed above were served:

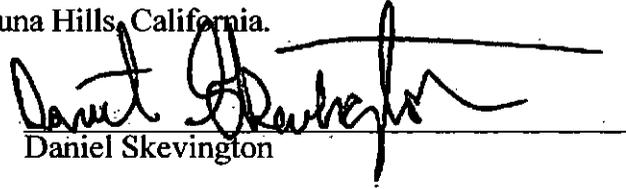
- BY U.S. MAIL** - I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on the same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing affidavit.

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BY ELECTRONIC MAIL - Based on a court order or an agreement of the parties to accept electronic service, I, Daniel Skevington, Dan@BrowerLawGroup.com, caused such document(s) to be electronically mailed in PDF format as an e-mail attachment to the above listed addressee(s) for the above-entitled case. The transmission was complete and confirmed. A copy of the transmittal e-mail will be maintained with the original document(s) in our office.

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

Executed on August 30, 2022, at Laguna Hills, California.


Daniel Skevington