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10 **IN THE SUPERIOR COURT**
11 **OF THE COUNTY OF SANTA CRUZ**

13 **THE PEOPLE OF THE STATE OF**
CALIFORNIA, EX REL. BILL LOCKYER,
14 **Attorney General of the State of California,**

15 **Petitioner/Plaintiff,**

16 **v.**

17 **COUNTY OF SANTA CRUZ; GAIL PELLERIN in**
18 **her Official Capacity as County Clerk and**
19 **Registrar of Voters of the County of Santa Cruz,**
and DOES 1 through 10, inclusive,

20 **Respondents/Defendants.**

CASE NO.

PETITION FOR WRIT OF
MANDATE (Code Civ. Proc.,
§ 1085) AND COMPLAINT
FOR INJUNCTIVE RELIEF
(42 U.S.C. § 12131 et seq.)

22 **INTRODUCTION**

23 The right to vote is fundamental in American society. This right inures to the benefit
24 of all citizens regardless of their visual acuity, walking ability, ability to climb stairs, ascend
25 steep inclines, or maneuver doors and latches. Voters with disabilities are entitled to participate
26 in the American tradition of voting at public polling sites on an equal basis with voters who do
27 not have disabilities and in an integrated setting, along with their friends, neighbors, and
28 colleagues. The right to vote should not depend on the ability of individuals to surmount

1 promulgated by the California Secretary of State for accessibility by individuals with physical
2 disabilities.

3 2. Title II of the Americans with Disabilities Act (“ADA”), United States Code, title 42,
4 section 12131 et seq., which became effective on January 26, 1992, and the regulations
5 promulgated thereunder, also require elections officials to ensure that the polling sites they
6 designate be readily accessible to and usable by individuals with disabilities on election day.

7 **JURISDICTION AND VENUE**

8 3. This Court has jurisdiction over causes of action for mandamus relief pursuant to Code
9 of Civil Procedure section 1085 alleging the failure to carry out mandatory statutory
10 responsibilities pursuant to Elections Code 12280. This court also has concurrent jurisdiction
11 with the federal courts over causes of action alleging violations of the ADA.

12 4. Venue is proper in this court because the unlawful acts complained of in this
13 Petition/Complaint occurred within the County of Santa Cruz.

14 **PARTIES**

15 5. Petitioner Bill Lockyer is the duly elected Attorney General of the State of California.
16 Under the California Constitution, Article V, section 13, the Attorney General has the duty to see
17 that the State’s laws are uniformly and adequately enforced for the protection of public rights
18 and interests. The Attorney General also possesses *parens patriae* standing to commence legal
19 actions for violations of any federal laws concerning the health and welfare of the State’s
20 citizens, including the ADA.

21 6. The Attorney General brings this action to protect the rights of individuals who
22 have visual and/or mobility impairments, including those that use a wheelchair, walking aid, and
23 are substantially limited in one or more of the major life activities, such as walking, or have an
24 anatomical, physiological, or neurological condition that prevents the exercise of normal bodily
25 function. These individuals have a qualified disability as that term is defined by applicable law.

26 7. The Attorney General invokes his *parens patriae* standing because
27 Respondents/Defendants’ failure to ensure that Santa Cruz County’s polling sites are accessible
28 affects a large number of California residents. According to the most recent U.S. Census data, as

1 of 2004, Santa Cruz County’s population was estimated to be approximately 250,633 people.
2 The U.S. Census Bureau estimates that of this population, approximately 15.9% or roughly
3 37,895 individuals aged 5 and over have disabilities. Absent Attorney General action, many of
4 these individuals who are eligible to vote will be deterred from exercising or unable to exercise
5 their fundamental right to vote on an equal basis with individuals without disabilities and will
6 suffer irreparable harm.

7 8. The Attorney General has an interest in the health and well being of the People of the
8 State of California. An important component of that well being is the ability of its citizens to
9 exercise the fundamental right to vote in an integrated setting. Santa Cruz County employs
10 approximately 135-140 polling sites during statewide elections. A voter with a disability who
11 does not discover that his or her polling site is inaccessible until election day would be unable to
12 obtain legal relief before the polls closed and his or her right to vote in that election would be
13 irretrievably lost or compromised.

14 9. The Attorney General also has a substantial sovereign interest in assuring that all
15 citizens are free to exercise their fundamental right to vote and to do so in an integrated setting
16 without discrimination on the basis of their disability. Such discrimination threatens the rights
17 and privileges of California’s citizens, and jeopardizes the integrity of the democratic process.

18 10. Respondent/Defendant County of Santa Cruz (“County” and/or “Santa Cruz”) is a
19 public entity incorporated under the laws of the State of California under the California
20 Constitution, Article XI, section 1. The County operating through its County Elections
21 Department is responsible for conducting elections under the California Elections Code. This
22 responsibility includes designating polling site locations to enable voters to cast their ballots on
23 election day. The County is responsible for ensuring, among other access requirements, that
24 every polling site that offers off-street parking has accessible parking and that every polling site
25 has accessible exterior routes of travel to the entrance, as well as accessible entrances and
26 interior access.

27 11. Respondent/Defendant Gail Pellerin (“Pellerin”) is the County Clerk and Registrar of
28 Voters of the County of Santa Cruz. Pellerin is the official responsible for designating polling

1 sites in Santa Cruz County and ensuring that these sites meet state and federal accessibility laws,
2 including the Secretary of State's accessibility guidelines, on election day.

3 12. The true names and capacities of Respondents/Defendants sued herein under the
4 fictitious names Does 1 through 10 are unknown to the People. The People will seek leave of
5 court to amend this Petition/Complaint to allege such names and capacities as soon as they are
6 ascertained.

7 13. All references in this Petition/Complaint to any of the Respondents/Defendants shall
8 also include all of them, unless otherwise specified. Whenever reference is made in this
9 Petition/Complaint to any act of Respondents/Defendants, such allegation shall mean that each
10 Respondent/Defendant acted individually and jointly with the other Respondents/Defendants.

11 14. At all relevant times, each Respondent/Defendant has committed the acts, caused
12 others to commit the acts, or permitted others to commit the acts alleged in this Petition/
13 Complaint.

14 15. Any allegation about any acts of the County of Santa Cruz shall mean that the County
15 did the acts alleged through its officers, elected officials, directors, employees, agents, and/or
16 representatives while they were acting within the actual or ostensible scope of their authority.

17 **FACTUAL ALLEGATIONS**

18 16. During the March 2 and November 2, 2004 statewide elections, Petitioner surveyed
19 Santa Cruz's polling sites to determine the County and Pellerin's (collectively "Respondents")
20 compliance with state and federal disability access laws.

21 17. The surveys conducted during both the March 2 and November 2, 2004 elections
22 examined three major access issues: 1) parking; 2) exterior travel routes; and 3) interior-site
23 access. The specific items surveyed under each access issue are as follows:

24 **1. Parking:**

- 25 • Off-street parking availability
 - 26 < Number of parking spaces
 - 27 < Number of disabled designated spaces
 - 28 < Location of disabled spaces to the facility

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- < Parking elevation
- < Disabled signage
- < Accessible pathways to the facility

2. Exterior Routes of Travel:

- Accessible routes including ramps to travel to the entrance
- Adequate path widths to accommodate wheelchairs
- Slip resistant surfaces
- Obstructions
- Ramp adequacy: width, level landings, handrails, and guardrails
- Entrance accessibility
- Adequate signage for disabled entrances

3. Interior of Polling Site:

- Adequate doorway clearances
- Adequate doorway thresholds
- Door operation
- Accessible exit doors
- Accessible panic hardware for doors
- Adequate clearance on each side of a doorway
- Accessible hallways and corridors
- Interior obstructions
- Accessible voting booths
- Adequate voting privacy
- Adequate lighting
- Adequate ramps
- Adequate flooring: Stable, slip resistant
- If applicable, adequacy of any elevators
- If applicable, accessibility of the restrooms
- Responsiveness of poll workers to accommodation requests

1 18. The surveys assessed those violations which were most easily observable
2 and potentially most significant in hampering or precluding access to the polling sites by voters
3 with disabilities. For instance, since January 1992, in order for a polling site to provide
4 meaningful access and be readily accessible to voters with disabilities in conformance with the
5 ADA, the following accessibility conditions, among others, set forth in the ADA Accessibility
6 Guidelines (ADAAG), codified at 28 C.F.R. Pt. 36, App A, must be present at polling sites on
7 election day: if off-street parking is provided at the polling site, there must be at least one
8 disabled parking spaces with an eight-foot aisle to allow for the loading and unloading of a
9 passenger with a wheelchair; there must be at least one accessible route from the parking area to
10 the entrance that is not interrupted by unramped steps or abrupt level changes greater than half
11 an inch; ramps must be equipped with level landings, handrails, edge protections and a non-slip
12 surface and not exceed an 8.3% slope; doorways must be at least 32-inches wide with the door
13 open at 90 degrees; door thresholds must be no greater than a half-inch in height; if the main
14 entrance is not accessible, the accessible alternative entrance must be clearly marked; and, any
15 obstructions that overhang a pedestrian's way must be sufficiently high so that a person with a
16 visual impairment would not bump into them. The above-referenced accessibility requirements
17 are also required by the current Secretary of State's accessibility guidelines that were in effect
18 during the November 2004 election. A number of these requirements were also included in the
19 Secretary of State's former accessibility guidelines that were in effect during the March 2, 2004
20 general election.

21 19. During the March 2, 2004 statewide election, Petitioner surveyed 114 of the 140
22 polling sites in Santa Cruz County. The survey results revealed that of the sites surveyed, 65%
23 had at least one "high-priority barrier." High-priority barriers are those violations of the
24 ADAAG's requirements governing parking, exterior route of travel and interior of the site that
25 are most likely to make access especially difficult, hazardous, or even impossible. A number of
26 these high-priority barriers also violated the Secretary of States' accessibility guidelines. Of the
27 sites surveyed, at least 25% had two or more high-priority barriers and the County averaged 4.45
28 violations of the ADAAG per site.

1 20. Specific examples of violations of the Secretary of State’s accessibility guidelines and
2 the ADAAG at polling sites in Santa Cruz during the March 2, 2004 election disclosed by the
3 survey results are as follows:

- 4 a. the Boulder Creek Fire House site required climbing eight steps with no
5 alternative entrance;
- 6 b. the Boulder Creek Country Club site had a pathway with a 21% slope, almost
7 three times the allowable slope;
- 8 c. the St. Peter and Paul Orthodox Church site had a ramp with a 23% slope, more
9 than two and a half times the legal 8.3% limit;
- 10 d. The Pasatiempo Inn site had a ramp with a 17% slope, more than twice the
11 allowable slope;
- 12 e. The Tradewinds Mobile Park site had a ramp with a 34% slope;
- 13 f. The Advent Christian Youth Lodge site had stairs with no alternative accessible
14 entrance; and,
- 15 g. All three ramps at the Natural Bridges Elementary School site had slopes of 18-
16 20%.

17 21. The survey results further revealed that of the Santa Cruz polling sites surveyed during
18 the March 2, 2004 election, approximately 41% of the sites that provided off-street parking
19 lacked accessible parking that was in conformity with the ADAAG; the parking deficiencies
20 included a lack of adequate widths and adequate unloading aisles.

21 22. Approximately 20% of the sites surveyed in Santa Cruz during the March 2, 2004
22 election had sections of the exterior path of travel to the entrance that violated the ADAAG due
23 to a failure to provide adequate ramps, including handrails, or ramps that were excessively steep;
24 approximately 12% had non-complying routes from the parking due to conditions such as abrupt
25 level changes, including stairs or damaged sidewalks; approximately 11% had inaccessible
26 routes or stairs from the public right of way, such as from a bus stop, to the entrance;
27 approximately 13% had door thresholds that were one inch or higher (double the half-inch limit);
28 and approximately 11% failed to include adequate signage to an accessible entrance when the

1 primary entrance was inaccessible. A number of these conditions also violated the Secretary of
2 State's accessibility guidelines that were in effect during the March 2, 2004 election.

3 23. Approximately 55% of polling sites in Santa Cruz during the March 2, 2004 election
4 had serious barriers to restroom access in violation of the ADAAG, including inaccessible entry
5 doors or inadequate maneuvering space in the room.

6 24. The results from the Petitioner's survey of Santa Cruz's polling sites during the March
7 2, 2004 general election were provided to the County of Santa Cruz on or about July 2004.

8 25. During the November 2, 2004 election, Petitioner surveyed 98 of the 135 polling sites
9 in Santa Cruz County. The survey results reflected that a substantial portion of the County's
10 polling sites had high-priority barriers in violation of the Secretary of State's accessibility
11 guidelines and the ADAAG. These high priority barriers were of the type that were most likely
12 to make access especially difficult, hazardous, or even impossible. Of the sites surveyed,
13 approximately 72% had at least one or more high-priority barriers, at least 41% had two or more
14 high-priority barriers, and approximately 22% had three or more such barriers. Overall the
15 County's polling sites were not readily accessible to and usable by voters with disabilities on the
16 same basis as voters without disabilities.

17 26. Examples of violations of the Secretary of State's accessibility guidelines and the
18 ADAAG at polling sites in Santa Cruz during the November 2, 2004 election as demonstrated by
19 the survey results are as follows:

- 20 a. Approximately 28% of the sites surveyed that provided off-street parking failed to
21 provide properly sized accessible parking spaces and/or properly sized access
22 aisles;
- 23 b. Approximately 24% of the sites surveyed had inaccessible conditions on the route
24 from the parking lot to the polling site entrance, including abrupt level changes
25 greater than one-half inch, steep slopes exceeding 8.3%, and inadequate ramps;
- 26 c. Approximately 31% of the sites surveyed had inaccessible features on the exterior
27 route of travel from the street or sidewalk to the polling site, including abrupt-
28 level changes exceeding one-half inch, steep slopes exceeding 8.3%, and

1 inadequate ramps; and,

- 2 d. Approximately 13% of the sites surveyed had inaccessible door thresholds that
3 were one inch or higher (at least twice the allowed height).

4 27. Specific examples of polling sites used for the November 2004 election that had
5 significant barriers to access that could make usage difficult or hazardous, and in some cases
6 impossible, for individuals with disabilities as revealed by the survey results include the
7 following:

- 8 a. The Rio Sands Motel site had a door width of 26½ inches (32 inches is the
9 minimum allowable width), parking spaces with a 13% slope (the maximum
10 allowed is 2%), and ramps with no edge protection, no handrails and no top
11 landing;
- 12 b. The Seascape Golf Club site had a 22% entryway slope (the maximum allowed is
13 8.3%), and no access aisle for the accessible parking space;
- 14 c. The Boulder Creek Fire Department site could only be reached by ascending
15 stairs, the clear width of the entry door was only 28" (32" is the minimum
16 required), and the door thresholds presented a 2" inch high abrupt level change
17 (½" is the allowed maximum);
- 18 d. The Pinto Lake Mobile Estates site had 2¼-inch high door thresholds (the
19 maximum allowed is ½ inch);
- 20 e. The Santa Cruz County Health Center site had parking lot slopes of 5% (more
21 than double the maximum 2% allowed) and curb-ramp slopes of 12.6%;
- 22 f. The Santa Cruz Garden School site had walkway slopes of 11-12%;
- 23 g. The Emerald Bay Apartments site had a 10-14% sloped ramp with no handrails or
24 edge protection;
- 25 h. The Trade Winds Mobile Park site in Capitola had a 35% sloped curb at the entry
26 gate;
- 27 i. The Christ Child Community Church site had multiple approximately 11% ramps,
28 some with non-compliant handrails and others with no handrails;

- 1 j. The Landmark Elementary School site had a van-accessible parking space sloping
2 at 5%, more than double the allowed maximum;
- 3 k. The First Methodist Church site had a parking lot ramp with an 11% slope, with
4 only one handrail and no edge protection; and,
- 5 l. The Casserly Community Center site had a ramp with a 10% slope, non-
6 compliant handrails and no level landing at the exterior door entrance.

7 28. Respondents' failure to comply with the Secretary of State's accessibility guidelines
8 and ADAAG with respect to its selection of polling sites harms those individuals who may use
9 wheelchairs, or walk with the aid of crutches and walkers for whom steep slopes, distant parking,
10 inadequate parking spaces, and stairs constitute obstacles to access. Furthermore, even
11 individuals who are not presently disabled may, through accident or illness, become disabled, or
12 at least temporarily so, and face the same types of barriers. These individuals may also find
13 themselves shut out from their polling site because of insurmountable physical barriers or
14 deterred from accessing these sites because of the County's violations of state and federal
15 disabled access laws.

16 29. Respondents' failure to ensure that the County's polling places are accessible to voters
17 with disabilities will cause those individuals irreparable harm.

18 **FIRST CAUSE OF ACTION**

19 **PETITION FOR WRIT OF MANDATE (CODE CIV. PROC. § 1085)**
20 **FOR FAILURE TO PERFORM MINISTERIAL DUTY UNDER**
21 **THE CALIFORNIA ELECTIONS CODE**

22 **(AGAINST ALL RESPONDENTS/DEFENDANTS)**

23 30. The People reallege and incorporate by reference paragraphs 1 through 29 of this
24 Complaint.

25 31. Since at least 1990, Respondents have had a clear, present and ministerial duty to
26 ensure that their polling sites comply with the Secretary of State's accessibility guidelines.

27 32. The Attorney General, as chief law officer of the State of California has a clear, present
28 and beneficial right to require the Respondents to comply with the Secretary of State's
accessibility guidelines and Elections Code section 12280. It is in the public's interest for all

1 polling sites to comply with the Secretary of State's accessibility guidelines to ensure that
2 individuals with disabilities are given the opportunity to exercise their right to vote on an equal
3 basis with voters who do not have disabilities.

4 33. During the March 2 and November 2, 2004 statewide elections, Respondents failed to
5 ensure that on election day, all of its polling sites complied with the Secretary of State's
6 accessibility guidelines that were in effect during each of the two-referenced elections.

7 34. By failing to ensure that their polling sites comply with the standards set forth in the
8 Secretary of State's accessibility guidelines during the March 2, and November 2, 2004
9 statewide elections, Respondents have violated their ministerial duties under Elections Code
10 section 12280.

11 35. Based on Santa Cruz County's pattern of pervasive non-compliance with the ADA and
12 the Secretary of State's accessibility guidelines in its selection of polling sites, the Attorney
13 General believes that unless enjoined, Respondents will continue to select and use polling sites
14 that are not in conformity with the Secretary of State's accessibility guidelines and Elections
15 Code section 12280. Respondents' violations of Election Code section 12280 and the Secretary
16 of State accessibility guidelines, unless enjoined, will cause irreparable harm to the People of the
17 State of California.

18 36. With respect to Respondents' violations of the Secretary of State's accessibility
19 guidelines and Elections Code section 12280, the Attorney General has no plain, speedy and
20 adequate remedy at law

21 **SECOND CAUSE OF ACTION**

22 **VIOLATION OF THE AMERICANS WITH DISABILITIES ACT**
23 **(42 U.S.C. §§ 12131-12134)**

24 **(AGAINST ALL RESPONDENTS/DEFENDANTS)**

25 37. The People reallege and incorporate by reference paragraphs 1 through 29 of this
26 Complaint.

27 38. Respondents are public entities and public officials for purposes of Title II of the
28 ADA, United States Code, title 42, section 12131.

39. Title II of the ADA provides that "[s]ubject to the provisions of this subpart, no

1 qualified individual with a disability shall, by reason of such disability, be excluded from
2 participation in or be denied the benefits of the services, programs or activities of a public entity,
3 or shall be subjected to discrimination by any such entity." 42 U.S.C., § 12132 . This provision
4 requires the County to ensure that the polling sites it selects provides voters with disabilities with
5 meaningful access to voting sites on election day. Given the fundamental importance of voting
6 in our society, meaningful access under the ADA in the context of voting requires that voters
7 with disabilities have the opportunity to vote at their regularly designated polling sites on
8 election day, in an integrated setting, along with friends, neighbors and colleagues. Meaningful
9 access under the ADA in the context of voting thus requires elections officials to ensure that
10 voters with disabilities are not confronted with architectural barriers that are expressly prohibited
11 by ADAAG's requirements governing parking, exterior path of travel, and the interior of public
12 and private facilities used as polling sites.

13 40. That elections officials comply with the ADAAG as to its selection of voting sites is
14 also required by the federal regulations promulgated pursuant to the ADA. Those regulations
15 require that when providing a service, a public entity may not "[a]fford a qualified individual
16 with a disability an opportunity to participate in or benefit from the aid, benefit, or service that is
17 not equal to that afforded to others." 28 C.F.R., § 35.130, subd. (b)(1)(ii). Further, when
18 determining the site or location of a facility, a public entity may not make selections:

19 "(i) That have the effect of excluding individuals with disabilities from, denying them
20 the benefits of, or otherwise subjecting them to discrimination; or

21 "(ii) That have the purpose or effect of defeating or substantially impairing the
22 accomplishment of the objectives of the service, program, or activity with respect to
23 individuals with disabilities." 28 C.F.R., § 35.130 subd. (b)(4).

24 41. During the March 2 and November 2, 2004 statewide elections, the County failed to
25 provide voters with disabilities with meaningful access to its polling sites on election day in
26 violation of the ADA and its implementing regulations. The County's voting program at the
27 polling sites, and/or in its entirety, was not readily accessible to voters with disabilities in
28 compliance with the ADA during the March 2 and November 2, 2004 statewide elections. By

1 failing to ensure that its polling sites comply with the ADAAG, respondents have violated the
2 ADA and the regulations promulgated thereunder, including the United States Code, title 42,
3 section 12132 and the Code of Federal Regulations, title 28, chapter 1, section 35.130.

4 42. In light of Santa Cruz County's pattern and practice of non-compliance with the ADA,
5 the People believe that Respondents will continue to fail to ensure that the polling sites it selects
6 are in conformity with the ADAAG and the ADA. Respondents' ongoing violations of the
7 ADA, unless enjoined, will cause irreparable harm to the People of the State of California.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, the People pray for judgment as follows:

10 1. That a preliminary injunction issue enjoining Respondents County of Santa Cruz and
11 Gail Pellerin, in her Official Capacity as County Clerk and Registrar of Voters of the County of
12 Santa Cruz during the pendency of this litigation from violating Elections Code section 12280
13 and/or the Americans with Disabilities Act, United States Code, title 42, sections 12131-12134
14 and its implementing regulations, including, but not limited to, the violations alleged in this
15 Petition/Complaint;

16 2. That a peremptory writ of mandate issue, under Code of Civil Procedure section 1085,
17 directed to Respondents County of Santa Cruz and Gail Pellerin, in her Official Capacity as
18 County Clerk and Registrar of Voters of the County of Santa Cruz and compelling said
19 Respondents to ensure that all of the polling places in the County of Santa Cruz for every
20 election comply with the Secretary of State's accessibility guidelines in effect at the time of the
21 election.

22 3. That all Respondents, their agents, employees, officers, representatives, successors,
23 partners, assigns, and all persons acting in concert or participating with them, be permanently
24 enjoined from violating the Americans with Disabilities Act, United States Code, title 42,
25 sections 12131-12134 and its implementing regulations and failing to comply with the disability
26 access requirements set forth in the ADAAG when selecting polling sites in the County of Santa
27 Cruz, including, but not limited to, the violations alleged in this Petition/Complaint;

28 4. That a monitor, to be paid for by the County of Santa Cruz, be appointed by the Court

1 to oversee compliance with the peremptory writ of mandate and permanent injunction;

2 5. That the People recover their costs and reasonable attorneys fees pursuant to 42
3 U.S.C., § 12205; and,

4 6. That the Court grant such other and further relief as it may deem just and proper.

5 Dated: October 11, 2005

6 Respectfully submitted,

7 BILL LOCKYER
8 Attorney General of the State of California
9 LOUIS VERDUGO, JR.
10 Senior Assistant Attorney General
11 NANCY A. BENINATI,
12 Deputy Attorney General

13 ANGELA SIERRA
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17 Bill Lockyer, Attorney General of the State of
18 California

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