

1 LAURA HOBBS  
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**FILED**

APR 03 2024 *sw*

4 LAURA HOBBS, IN PRO PER

SHASTA COUNTY SUPERIOR COURT  
BY: S. WILLIS, DEPUTY CLERK

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SHASTA**

10 LAURA HOBBS

11 Plaintiff(s),

12 vs.

13 ALLEN LONG, an individual

14 CATHY DARLING ALLEN, in her capacity as  
15 Shasta County Clerk of Elections

16 Defendant(s).

) Case No.: 204675

) **AMENDED DECLARATION OF LAURA  
HOBBS IN SUPPORT OF JUDICIAL  
REVIEW FOR ELECTION CONTEST**

) **DATE:**  
) **TIME:**  
) **DEPT:**

) Judge:  
) Dept:  
) Action Filed:  
) Trial Date:

19  
20 DATED: 4/3/24

21  
22 *L. Hobbs*  
23 \_\_\_\_\_  
24 LAURA HOBBS  
In Pro Per

25 **AMENDED DECLARATION OF LAURA HOBBS**

26 I, Laura Hobbs, declare:

- 27 1. I am a resident of the State of California over the age of 18 years and am a Petitioner in this action. I  
28 have personal knowledge of the facts set forth herein, except those matters which are stated upon

1 information and belief, and as to those matters, I believe it to be true. If called to testify, I would  
2 and could testify competently as to the following:

- 3 2. I reside at 6751 W. Waverly Ave, Redding Ca.
- 4 3. I am candidate in the March 5, 2024 election for Shasta County Supervisor in District 2. I wish to  
5 contest the results of this election based on Ca Election Code 16101 section c, and e.
- 6 4. The Shasta County Register of Voters (ROV) Cathy Allen certified on Thursday March 28, that Allen  
7 Long avoided a run off and won the contest of district 2 supervisor by garnering 50% plus 14 votes.  
8 The minimum needed for him to avoid a run off was 50% plus 1 vote. This is a request for judicial  
9 review and an official contest of the election results.
- 10 5. Mal-administration of the election lead to Hobbs losing approximately 539 votes, far exceeding the  
11 14-vote margin of outright victory for Allen Long. The Randomized Alphabet Drawing  
12 Memorandum #23149 (see Exhibit A) assigned by the Secretary of State on 12-14-23 to be used by  
13 all the counties in the assigning the official order of the placement candidates on the ballot was not  
14 followed in this race. Previous court precedent found a 5% advantage to the candidate listed first  
15 and required a random selection be conducted to determine ballot placement order (Gould v.  
16 Grubb). According to memorandum #23149 Hobbs should have been placed first on the ballot,  
17 letter "G" was first but there were no other contestants whose last name started with a "G". Letter  
18 "H" was the next letter called this would place Hobbs in the first position (the other candidates in  
19 this race were Long, Sloan, and Baremore). Hobbs was listed third on the ballot. Five percent of  
20 votes cast (10,792) in district two equals 539 votes.
- 21 6. The ROV discriminated against Hobbs during the ballot designation process. She was not allowed  
22 to state her occupation as "microbiologist", even though she has credentials in that field; a Ph. D  
23 that will never expire. Hobbs explained that she took time off to raise her children. They stated  
24 that she could only use her current occupation. Because she wasn't permitted to list her true  
25 career, she suggested they use Election Data Analyst and submitted evidence to substantiate that  
26 occupation. They refused this designation because no money changed hands during this  
27 occupation and assigned her with the designation "Parent" (a designation that is also lacking  
28 monetary exchange). She contested this designation. (see Exhibit B, Ballot Designation Email).  
They did not apply the same principle to Allen Long. Though he is currently a school board member  
and a parent, they did not use either as his ballot designation. They afforded him special favor and  
permitted him to use his career designation as retired police officer. The favor granted to him in  
this process lead to an immeasurable vote advantage for Long.
7. Ca Election Code 16101 states "(e) Due to mistake, error, or misconduct the votes in any precinct  
were so incorrectly counted as to change the result." The audit log contains precinct numbers for  
each batch written in the notes section (e.g. in line 209607 of the audit log it states: Batch 194  
created, Type: 'Vote By Mail', Voting Method: Paper Ballots, Notes: '0431004') that does not match  
the precinct numbers we witnessed fist hand. For batch 194 we observed on March 11th, at  
1:51pm that the precinct '0391210' was written in the notes (see Exhibit J, line 2). The first precinct  
number corresponds to district 4 (as it begins with 04) and the second precinct number  
corresponds to district 3 (as it begins with 03). The fact that these were two entirely different

1 districts is cause for alarm. This was not an isolated occurrence precinct mismatches occurred in 91  
2 out of 92 VBM batches examined (see Exhibit L, VBM Observed Precinct vs Audit Log Precinct).  
3 When the entire election is examined, this number will rise considerably. This represents an  
4 egregious error. The elections results are balanced by precinct according to Joanna Francescut the  
5 Deputy ROV (personal communication 3/28/24). This is the very framework by which all ballots are  
6 tallied, and if this framework or scaffolding is not correct it calls into question the validity of all  
7 election results.

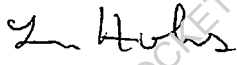
- 8
- 9 8. Audit log problems continued: There are many discrepancies in the audit log time and dates vs the  
10 time and date recorded by observers at the ROV office during the scanning of the ballots (see  
11 Exhibit C, Observer Tabulator Screen and Exhibit J, Sample Observation Data). I also witnessed that  
12 the number of ballots in each batch did not match the audit log.
- 13 9. Many batches were run in tabulators that had the wrong dates and/or times on the monitors. On  
14 3/22/24 the time was off by 1 hour on the only functioning unit (workstation D2200309706). The  
15 actual time was 9:55am, but the computer said it was 8:55am. The ROV ran them anyways stating  
16 they would file an incident report. With an incorrect audit log, it is almost impossible to recreate  
17 the ballot processing which is the purpose of the audit log.
- 18 10. There was a problem observed with the scanner/computer combos on March 11, 2024. Two of the  
19 four computers did not have the correct time listed. They shut those two computers down and just  
20 used the two with the correct time. Joanna Francescut later explained that it could not update after  
21 the time change because it was not connected to the internet. This begs the question, "Why were  
22 two computers telling the correct time, was it because they were connected to the internet?". It is  
23 against state law for a voting system to be connected to the internet CA Elec Code § 19205 (2017)  
24 (a). The following day March 12, 2024, only one of the four computer clients had the correct time.  
25 One of the two that were working the day before had the correct time but was now 1 whole day  
26 off. They shut that machine off and then went to using one computer client. On Friday March 22<sup>nd</sup>,  
27 the last remaining computer would no longer tell the correct time, it was one hour behind. They  
28 went ahead and counted despite this problem, saying that it would be noted on the statement of  
votes.
11. Many batches were discarded. In the case of a scanner error a re-run is justified. However, by  
comparing user name, precinct number, and tabulator number we are able to distinguish the  
batches that were discarded unnecessarily from routine re-runs. If a batch is created by a different  
user, different precinct, and different tabulator then the duplicate should be retained and not  
discarded. To date, I have found approximately 40 duplicate batches that were wrongfully  
discarded. This, in-effect, wrote over the data in the previous batch with the same batch number.  
The duplicate batches were then discarded according to the audit log. In district 1 there were 1438  
ballots wrongfully discarded, in district 2 there were 253 ballots wrongfully discarded, in district 3  
there were 940 ballots wrongfully discarded, in district 4 there were 375 ballots wrongfully  
discarded, and in district 5 there were 790 wrongfully discarded ballots. (see Exhibit D, Discarded  
Batches). County-wide, this amounts to approximately four thousand votes discarded. This number  
is anticipated to increase as the remainder of the election is analyzed.

- 1 12. Audit log "Ballots Cast Count" and the observed "Ballot Count" did not match on multiple  
2 occasions. Example: VBM Batch 121 (290462 in district 2) ran on 3/8/24 at 11:53, contained 14  
3 ballots based on observations. The audit log says that this same batch contains 100 ballots, a  
4 difference of 86 ballots. This was observed primarily in the VBM ballots and not in the election day  
5 ballots. Of 67 election day batches examined, only two batches had ballot numbers that did not  
6 match our observations, and they were only off by one vote each. However, the mail-in batches  
7 had many errors, of 107 batches examined 52 batches had ballot totals that did not match our  
8 observations. As a result, ballots were either added or lost to each batch. In total district 1 had 579  
9 ballots added or lost, district 2 had 339 ballots added or lost, district 3 had 162 ballots added or  
10 lost, district 4 had 260 ballots added or lost, and district 5 had 65 ballots added or lost. This  
11 number is expected to grow as it only one third of all VBM batches have been analyzed (see Exhibit  
12 E, VBM Saved Batches).
- 13 13. Cast Vote Record (CVR): A Cast Vote Record file is an auditing document that allows you to replay  
14 the election from start to finish. It also tells you how each ballot was voted. Concerningly, the  
15 batch precinct number in the CVR data does not match the batch precinct number observed first  
16 hand. Additionally, the number of ballots per batch in the Cast Vote Record does not match the  
17 number of ballots per batch observed first hand. The date and time on the Cast Vote Records does  
18 not match the dates on the audit log nor the dates of observation. For instance, in the CVR file one  
19 set of batches are listed as 4am-6am on 3/6/24 however there was no tabulation taking place  
20 during that time period at the ROV's office. (see Exhibit F, CVR Batches vs Observed Batches). How  
21 is a proper accounting or audit possible with so many of these inconsistencies present?
- 22 14. CVR data of the Long vs. Hobbs contest exhibits two unusual patterns, that may be indicative of  
23 computer manipulation during the election. Both a precipitous decline and a steady decline were  
24 observed in the cumulative ratio. The precipitous decline is a striking change in the character of the  
25 contest and the steady decline is not normal in a fair election (which consists of randomized data)  
26 that should stabilize before the mid-point of counting (see Exhibit G, Cast Vote Record Review).
- 27 15. Large differences in a candidate's percentage were noted between Early Vote and Election Day.  
28 When examining the ballot drops subsequent to the 8:09PM 3/5/24 drop, we see some notable  
differences. There was a large difference between the percentages seen at 8:09PM and the  
election day votes (released at 1:12 am on 3/6/24). Historically, we have had differences of 0-7%  
between the early vote and election day (see Exhibit H, Historical Data). However, in this election,  
between the early vote and election day, we saw unbelievable differences of up to 33%. (see  
Exhibit H, Historical Data). These differences cannot be accounted for by demographics alone.  
Using VBM ballot tracks data it was determined that in all districts analyzed (D1-D4) more  
Republicans voted early than Democrats (see Exhibit I, Early Votes Demographic).
16. Many illegal ballots were cast in this election (see Exhibit K, Illegal Ballots).
17. I desire to have access to all related election materials in order to conduct a thorough comparison  
of documentary and electronic records in possession of the Registrar of Voters to ensure all cast  
ballots were legitimate. The materials include, but are not limited to, Cast Vote Records, digital  
ballot images, original vote by mail envelopes received from voters by the ROV, and complete  
scanning and tabulation audit logs.

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18. This lawsuit seeks to ask the court to find moot the nomination of Allen Long as winner of the March 5, 2024, primary election. Also, that if this court finds that there were substantial election errors to demand either a new election for the district 2 primary, or allow Laura Hobbs to be declared as qualified to an election runoff against Allen Long. One possible remedy would be a recount under additional parameters specified by the plaintiff. I seek also that the court issue a Writ of Mandate to the County Registrar of Voters to follow all remedies approved by the court for the administration of future elections.

Executed on April 3, 2024 at Redding, Ca  
I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.

  
\_\_\_\_\_  
Laura Hobbs

RETRIEVED FROM DEMOCRACYDOCKET.COM

RETRIEVED FROM DEMOCRACYDOCKET.COM

Exhibit L

Exhibit L, VBM Observed Precinct vs Audit Log Precinct (1 of 2)

VBM Observed Precinct vs Audit Log Precinct

Observed Batch #	Obs count	Count Match?	Obs Date	Obs time	Observed PCNT	Audit log Batch created PCNT	Audit log Batch Created
						(found from the notes)	
43	99	no	3/8/2024	10:01	320068	490650	43
44	100	yes	3/8/2024	10:00	590330	120894	44
45	100	no	3/8/2024	10:00	590330		45
46	100	yes	3/8/2024	10:00	27760	121750	46
47	UK	UK	3/8/2024	10:01	420861	510015	47
48	100	yes	3/8/2024	10:01	420912	120660	48
49	100	no	3/8/2024	10:03	420861	120660	49
51	100	yes	3/8/2024	10:05	220575	590940	51
52	100	no	3/8/2024	10:07	220170	591620	52
53	100	yes	3/8/2024	10:07	124750	592970	53
56	100	no	3/8/2024	10:11	220170	120390	56
58	100	yes	3/8/2024	10:19	590942	591310	58
61	100	no	3/8/2024	10:20	710068	120897	61
62	100	no	3/8/2024	10:20	540940	221979	62
63	UK	UK	3/8/2024	10:23	590940	221982	63
65	100	yes	3/8/2024	10:23	3320376	221982	65
66	100	no	3/8/2024	10:25	220770	590940	66
67	100	yes	3/8/2024	10:26	320420	220770	67
68	100	yes	3/8/2024	10:49	320420	511050	68
69	100	yes	3/8/2024	10:49	590940	220770	69
70	100	yes	3/8/2024	10:51	590940	490360	70
71	100	yes	3/8/2024	10:50	220770	490650	71
72	100	yes	3/8/2024	10:54	510030	290260	72
73	101	no	3/8/2024	10:54	320420	290260	73
74	100	yes	3/8/2024	10:58	510030	291930	74
76	100	yes	3/8/2024	11:01	320978	291640	76
77	100	no	3/8/2024	11:02	320420	220160	77
78	100	no	3/8/2024	11:03	511050	291640	78
79	100	yes	3/8/2024	11:05	590080	320376	79
80	100	no	3/8/2024	11:05	511050	431005	80
81	100	yes	3/8/2024	11:06	220170	510030	81
82	100	yes	3/8/2024	11:06	590080	431005	82
83	100	yes	3/8/2024	11:08	490360	431005	83
84	100	yes	3/8/2024	11:09	490320	320420	84
85	UK	UK	3/8/2024	11:13	590080	590940	85
86	99	no	3/8/2024	11:10	390560	320420	86
87	100	no	3/8/2024	11:12	220710	220460	87
88	100	no	3/8/2024	11:13	320978	120894	88
89	100	yes	3/8/2024	11:14	120660	220170	89

Exhibit L, VBM Observed Precinct vs Audit Log Precinct (2 of 2)

VBM Observed Precinct vs Audit Log Precinct

Observed Batch #	Count Obs count	Match?	Obs Date	Obs time	Observed PCNT	Audit log Batch created PCNT	Audit log Batch Created
						(found from the notes)	
90	100	yes	3/8/2024	11:16	120550	510015	90
91	100	yes	3/8/2024	11:18	431005	320420	91
92	100	yes	3/8/2024	11:19	590080	220460	92
93	99	no	3/8/2024	11:24	uk	490101	93
95	100	yes	3/8/2024	11:20	120560	320978	95
96	100	yes	3/8/2024	11:21	120560	490101	96
97	100	no	3/8/2024	11:31	510015	320978	97
98	100	yes	3/8/2024	11:28	510015	490091	98
99	100	yes	3/8/2024	11:28	220170	320978	99
100	100	yes	3/8/2024	11:30	120560	390070	100
102	100	yes	3/8/2024	11:33	220170	220760	102
103	100	yes	3/8/2024	11:35	4990650	420912	103
104	100	no	3/8/2024	11:36	490320	120570	104
105	100	no	3/8/2024	11:36	490590	220760	105
106	100	yes	3/8/2024	11:36	320974	420912	106
107	uk	uk	3/8/2024	uk	uk	390321	107
108	100	yes	3/8/2024	11:40	290390	390470	108
109	69	no	3/8/2024	11:40	121120	390470	109
110	100	yes	3/8/2024	11:40	390550	390560	110
111	100	yes	3/8/2024	11:43	390560	420912	111
112	100	yes	3/8/2024	uk	290260	420912	112
113	100	no	3/8/2024	11:43	290260	291640	113
114	100	no	3/8/2024	11:46	120897	420370	114
116	100	yes	3/8/2024	11:47	592970	420370	116
117	100	yes	3/8/2024	11:49	120570	420861	117
118	100	yes	3/8/2024	11:50	491005	420861	118
119	100	no	3/8/2024	11:55	291640	220575	119
120	100	yes	3/8/2024	11:52	120897	590080	120
121	14	no	3/8/2024	11:53	290462	591620	121
122	99	no	3/8/2024	11:56	431005	392113	122
123	52	no	3/8/2024	11:56	431005	391210	123
124	55	no	3/8/2024	11:57	290530	592970	124
125	57	no	3/8/2024	11:59	120570	420375	125
126	60	no	3/8/2024	11:59	220160	420375	126
128	8	no	3/8/2024	12:02	120463	420375	128
129	65	no	3/8/2024	12:03	120390	590330	129
130	42	no	3/8/2024	12:04	490557	121750	130
131	2	no	3/8/2024	12:04	120897	221979	131
132	17	no	3/8/2024	12:06	290260	591310	132
133	100	no	3/8/2024	12:09	120570	290260	133
134	100	yes	3/8/2024	12:08	120570	590942	134
135	58	no	3/8/2024	12:09	291640	590331	135
136	100	yes	3/8/2024	12:10	120570	320376	136
137	100	yes	3/8/2024	12:11	490101	590940	137
139	100	no	3/8/2024	12:13	390500	420370	139
140	100	no	3/8/2024	12:14	490101	uk	140
141	100	no	3/8/2024	12:16	431003	420375	141