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Pursuant to Gov. Code, § 6103*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF RIVERSIDE

14 **ATTORNEY GENERAL OF THE STATE
15 OF CALIFORNIA, ROB BONTA,**

Case No.

16 Petitioner,

17 v.

**EX PARTE APPLICATION FOR
18 EXPEDITED BRIEFING SCHEDULE;
DECLARATION OF LINDSAY M.
19 BAILEY**

20 **CHAD BIANCO, in his official capacity as
Riverside County Sheriff; and THE
RIVERSIDE COUNTY SHERIFF'S
OFFICE,**

Date: March 27, 2026

Time: 8:30 a.m.

Dept:

Judge:

Action Filed:

21 Respondents.

22
23 TO EACH PARTY AND THEIR ATTORNEYS OF RECORD:

24 PLEASE TAKE NOTICE that on March 27, 2026, at 8:30 a.m. at the Department listed
25 above of the above-entitled Court, located at 4100 Main Street, Riverside, California, 92501,
26 Petitioner Attorney General for the State of California Rob Bonta hereby applies *ex parte* for an
27 expedited briefing schedule on the merits of his Petition for Writ of Mandate.

28 ///

1 This *ex parte* application is made following a discussion of counsel, which took place on
2 March 25, 2026. Respondents' counsel stated Respondents oppose the proposed briefing
3 schedule.

4 This *ex parte* application is based on the attached Memorandum of Points and Authorities,
5 the attached Declaration of Lindsay M. Bailey, the Petition for Writ of Mandate filed
6 concurrently herewith, and any other evidence or argument that the court may permit.

7
8 Dated: March 26, 2026

Respectfully submitted,

9 ROB BONTA
10 Attorney General of California
11 PAUL STEIN (SBN 184956)
12 ANYA M. BINSACCA (SBN 189613)
13 Supervising Deputy Attorney General



14 LINDSAY M. BAILEY (SBN 285047)
15 ANNE P. BELLOWS (SBN 293722)
16 MALCOLM A. BRUDIGAM (SBN 323707)
17 LISA C. EHRLICH (SBN 270842)
18 Deputy Attorneys General
19 Attorneys for California Attorney General
20 Rob Bonta

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **INTRODUCTION**

3 Last month, Respondents Riverside County Sheriff Chad Bianco and the Riverside County
4 Sheriff’s Office initiated a sweeping and unprecedented criminal investigation into claimed
5 discrepancies between the number of votes that were cast and the number of votes that were
6 counted in the November 2025 Special Election in Riverside County. Acting on reports from a
7 local group whose claims were publicly debunked by the Riverside County Registrar of Voters,
8 the Sheriff seized roughly 1,000 boxes of ballots and began conducting an amateur and dubious
9 “recount” of the number of voted ballots.

10 Citing grave concerns about the legal sufficiency of the Sheriff’s investigation and the
11 warrants obtained during its course, and the negative impact on public confidence in election
12 administration that could result from a poorly supported criminal investigation, Petitioner
13 Attorney General Rob Bonta directed Respondents to pause all work on their investigation and
14 provide the Attorney General with a copy of the case file and related documents so he could
15 better understand the basis of the investigation and work with the Sheriff to decide the best course
16 of action. These directives were issued under the Attorney General’s supervisory authority over
17 all California sheriffs. (Cal. Const., art. V, § 13; Gov. Code, § 12560.)

18 Despite repeatedly representing that he would comply, Sheriff Bianco willfully violated the
19 Attorney General’s directives and continued to abuse the criminal process. Since receiving the
20 Attorney General’s directives, Sheriff Bianco has sought and obtained a third search warrant
21 related to his investigation, seized an additional 426 boxes of election material from the Riverside
22 County Registrar of Voters, and held a press conference in which he stated his intent to ignore the
23 Attorney General’s directives and conduct a purported “recount” of the ballots.

24 The Sheriff’s defiance of the Attorney General’s lawful directive demands immediate
25 judicial intervention. This matter poses a single, straightforward legal question: whether
26 Respondents are required to comply with the Attorney General’s supervisory orders relating to
27 their investigation of the November 2025 Special Election in Riverside County. Given
28 Respondents’ open and continuing defiance, the Attorney General will continue to suffer

1 immediate and irreparable harm if his Petition for Writ of Mandate is not considered on an
2 expedited basis.

3 **FACTUAL BACKGROUND**

4 On November 4, 2025, California held a statewide special election to vote on Proposition
5 50, also known as the “Election Rigging Response Act,” which would allow the State to use a
6 congressional district map drawn by the Legislature for elections held from 2026 through 2030.¹
7 On February 24, 2026, the Attorney General’s Office learned that Respondents had launched a
8 criminal investigation into alleged irregularities in the administration of the November 2025
9 Special Election in Riverside County and had obtained two criminal search warrants for balloting
10 materials maintained by the Riverside County Registrar of Voters (“ROV”). (Declaration of
11 Lindsay M. Bailey [Bailey Decl.] ¶ 2.)

12 The Attorney General’s Office requested and received copies of the two search warrants
13 from Respondents. (*Id.* ¶ 2.) Upon receipt, the Attorney General acting through Department of
14 Law Enforcement Chief Stephen Woolery requested that Sheriff Bianco delay executing the
15 warrants for one week to allow his office to better understand the basis for the investigation.
16 (*Ibid.*) Instead, Respondents moved up execution of the warrants, seizing 1,000 boxes of ballots
17 on February 25, 2026. (*Ibid.*)

18 The next day, February 26, 2026, the Attorney General directed Respondents to pause their
19 investigation, preserve all seized materials, and confirm compliance. (See Bailey Decl., Ex A
20 [February 26, 2026, Letter].) The Attorney General’s review of the initial warrants gave him
21 grave concern about the investigation. (*Ibid.*) First, the warrants had serious legal deficiencies.
22 The warrant affidavits identified no specific felony offenses Respondents had probable cause to
23 believe were committed, nor did they identify particular persons whom Respondents had probable
24 cause to believe committed any such offenses, as required by Penal Code sections 1524(a)(4) and
25 1525. (*Ibid.*) They also appeared to omit material facts. (*Ibid.*) Additionally, the scope and
26

27 ¹ Official information about this election is available on the Secretary of State’s website,
28 here. (Secretary of State, *Statewide Special Election – November 4, 2025*,
<https://www.sos.ca.gov/elections/prior-elections/statewide-election-results/statewide-special-nov-4-2025> .)

1 nature of the investigation raised a serious risk of unfairly harming public confidence in state
2 elections. (*Ibid.*)

3 Sheriff Bianco did not respond to the February 26 letter, and the Attorney General issued a
4 second letter on March 4, 2026. (Bailey Decl., ¶ 5.) In both the February 26 and March 4 letters,
5 the Attorney General exercised his supervisory authority over Sheriff Bianco by directing him to
6 pause all actions on the investigation and stand down. (Bailey Decl., Exs. A-B.) Finally, on
7 March 5, Sheriff Bianco informed the Attorney General’s Office that he was “complying with the
8 directive of the [March 4] letter pending further communication with your office.” (Bailey Decl.,
9 Ex. D.) The Attorney General therefore issued a third letter on March 6, 2026, again exercising
10 his supervisory authority, directing Sheriff Bianco to continue pausing all actions on the
11 investigation, and directing him to provide copies of the case file and related documents to the
12 Attorney General’s Office by March 11, 2026. (Bailey Decl., Ex. C.) The Sheriff never
13 complied with this request. (Bailey Decl., ¶ 5.)

14 In fact, unbeknownst to the Attorney General, on March 19, 2026, Respondents applied for
15 and received a *third* warrant to search and seize materials related to the November 2025 Special
16 Election. (Bailey Decl., Ex. E.) The next day, on March 20, 2026, Sheriff Bianco convened a
17 press conference² to announce that he had obtained a “court order” which he said required
18 counting the ballots and that a special master would be appointed. He also accused the Attorney
19 General of “interfering” in the investigation, stating “this investigation will continue despite AG
20 Bonta’s attempts to stop it.” (Sheriff Bianco Press Conference (Mar. 20, 2026), at 03:33,
21 <https://youtu.be/Lo6ir8fEULI?t=214>.)

22 On March 23, 2026, the Attorney General initiated legal action against Respondents in the
23 Court of Appeal, Fourth Appellate District, Division 2, requested an immediate stay of the
24 investigation, and served the petition on Respondents.³ (Bailey Decl., Ex. F.) Despite the
25 pending request, on March 24, 2026, Respondents completed execution of all warrants and seized

26 _____
27 ² A video of the press conference is available online at
<https://www.youtube.com/watch?v=Lo6ir8fEULI>.

28 ³ The Court of Appeal ultimately denied the request solely on the basis that Petitioners had
an adequate remedy in the superior court. (Bailey Decl. ¶ 9.)

1 additional materials from the Riverside County Registrar of Voters, [REDACTED]
2 [REDACTED]
3 [REDACTED]. (Bailey Decl. ¶ 10.)

4 In addition to continuing their investigation in violation of the Attorney General’s clear
5 directives, Respondents have failed to provide the requested case file and other documents to the
6 Attorney General’s Office. As a result of their defiance, the Attorney General is currently
7 prevented from exercising his supervisory authority over the investigation.

8 LEGAL STANDARD

9 In order to obtain *ex parte* relief, the moving party “must make an affirmative factual
10 showing in a declaration containing competent testimony based on personal knowledge of
11 irreparable harm, immediate danger, or any other statutory basis for granting relief.” (Cal. Rules
12 of Court, rule 3.1202(c).) Code of Civil Procedure section 36, subdivision (e), similarly provides
13 courts with “discretion [to] grant a motion for preference that is supported by a showing that
14 satisfies the court that the interests of justice will be served by granting this preference.” (See,
15 e.g., *Warren v. Schechter* (1997) 57 Cal.App.4th 1189, 1198–99 [courts “have discretion to grant a
16 motion for calendar preference upon an appropriate showing.”].) Such a motion may be granted
17 at the discretion of the court upon finding that there is “good cause to dispense with proceedings
18 by noticed motion.” (*Ferraro v. Camarlinghi* (2008) 161 Cal.App.4th 509, 523, citing Cal. Rules
19 of Court, rule 3.1202(c).)

20 ARGUMENT

21 The Court should grant the Attorney General’s expedited briefing schedule on the merits of
22 his Petition for Writ of Mandate. The Sheriff’s defiance of the Attorney General’s directives does
23 immediate and irreparable harm to the constitutional and statutory framework of state
24 government. The Attorney General is the chief law officer of the State vested by law with the
25 discretionary power to supervise sheriffs “in all matters pertaining to the duties of their respective
26 offices.” (Cal. Const., art. V, § 13; Gov. Code, § 12560.) Yet Respondents have ignored and
27 willfully violated the Attorney General’s clear orders related to this investigation. The Attorney
28 General therefore requires an expedited ruling from this Court to restore the constitutional order

1 of authority between the Attorney General and county sheriffs, halt the Respondents’ brazen,
2 ongoing violations of the Attorney General’s orders, and prevent Respondents’ from further
3 tampering with elections materials.

4 Sheriff Bianco’s criminal investigation and seizure of ballots and other materials from the
5 Riverside County Registrar of Voters is, as far as the Attorney General is aware, unprecedented in
6 state history. Most concerning, the investigation, on its face, suggests there is something
7 criminally awry with state elections in Riverside County. But the Attorney General’s review of
8 the probable cause affidavits indicates the absence of any legally sufficient basis for Sheriff
9 Respondents’ actions. (See Bailey Decl., Exs. A-C.) A rushed and inadequately supported
10 criminal investigation reinforces false narratives: that elections are suspect; that the results cannot
11 be trusted; and that election administration is compromised. That perception erodes public
12 confidence in the safety and security of our elections and, in turn, chips away at our democratic
13 system and potentially chills voter participation. (See *Purcell v. Gonzalez* (2006) 549 U.S. 1, 4
14 [“Confidence in the integrity of our electoral processes is essential to the functioning of our
15 participating democracy.”]; *Boydston v. Weber* (2023) 90 Cal.App.5th 606, 625, *as mod.* (Apr.
16 14, 2023) [recognizing the compelling interest in maintaining public confidence in elections].)

17 Thus, the public perception of this highly questionable criminal investigation and ongoing
18 flouting of the Attorney General’s directives is causing irreparable harm. (Cal. Rules of Court,
19 rule 3.1202(c); *Mae M. v. Komrosky* (2025) 111 Cal.App.5th 198, 221–222 [explaining that
20 irreparable harm “does not mean injury beyond the possibility of repair” but rather is used to
21 express “wrongs of a repeated and continuing character”].) The interests of justice counsel in
22 favor of granting *ex parte* relief, particularly where the Attorney General has no other option to
23 enforce his supervisory authority. (Code Civ. Proc., §§ 36, subd. (e).) And the Court is well
24 within its discretion to grant this application. (Code Civ. Proc. § 1005, subd. (b).)

25 Additionally, Respondents have now seized [REDACTED]

26 [REDACTED]
27 [REDACTED] Accordingly, Respondents continued
28 possession of these ballots and ballot envelopes irreparably harms the safety and security of [REDACTED]

1 [REDACTED] in violation of California law. (Cal. Rules of Court, rule 3.1202(c)
2 [affirmative showing includes “any other statutory basis for granting relief ex parte”].)

3 Finally, the Petition can be manageably resolved on an expedited briefing schedule. This
4 matter poses a single, straightforward legal question: whether Respondents are required to comply
5 with the Attorney General’s supervisory orders relating to their investigation of the November
6 2025 Special Election in Riverside County. Here, the law is clear: “Whenever the Attorney
7 General deems it necessary in the public interest the Attorney General shall direct the activities of
8 any sheriff relative to the investigation or detection of crime within the jurisdiction of the sheriff.”
9 (Gov. Code, § 12560; see also Cal. Const., art. V, § 13 [“The Attorney General shall have direct
10 supervision over every . . . sheriff . . . in all matters pertaining to the duties of their respective
11 offices[.]”].)

12 For all these reasons, the Attorney General respectfully asks that this Court expedite the
13 briefing schedule in this matter to allow for swift relief. The Attorney General, as the chief law
14 officer of the State, has a vital, constitutional interest in ensuring compliance with these basic
15 requirements governing the issuance of criminal search warrants in matters that he is supervising.
16 (Cal. Const., art. V, § 13.) The Attorney General also has a vital, constitutional interest in
17 ensuring compliance with California law governing the proper handling and preservation of
18 sealed ballots. (*Ibid.*; Elec. Code, §§ 17301-17302.) The Attorney General has deemed it
19 necessary and in the public interest for Respondents to comply with his orders. (Bailey Decl.,
20 Exs. A-C.) Respondents’ continued violation of the Attorney General’s clear and lawful
21 directives therefore causes irreparable harm to the Attorney General and the public, which merits
22 the Court’s timely intervention to consider the important legal questions presented in the Petition.

23 CONCLUSION

24 For the foregoing reasons, the Court should set the following briefing schedule for a
25 hearing on the Attorney General’s Petition for Writ of Mandate:

26 1. The Attorney General’s opening brief shall be filed within two court days after the
27 Court issues its Order setting the expedited briefing schedule;

1 2. Respondents' opposition brief shall be filed within two court days after Petitioner
2 files his opening brief;

3 3. The Attorney General's reply brief shall be filed within two court days after
4 Respondents' file their opposition brief;

5 4. A hearing on the Writ of Mandate shall occur at 8:30 a.m. the first court day after
6 Petitioner files his Reply brief, or as soon thereafter that the Court can hear it.

7 In the alternative, the Attorney General respectfully requests that the Court grant him leave
8 to file an application for a temporary restraining order within two court days. (See Riverside
9 County Sup. Ct. Local Rules, rule 3170, subd. (C) ["[N]o motion may be set without prior court
10 approval as set forth below."].)

11
12 Dated: March 26, 2026

Respectfully submitted,

13 ROB BONTA
14 Attorney General of California
15 PAUL STEIN (SBN 184956)
16 ANYA BINSACCA (SBN 189613)
17 Supervising Deputy Attorney General



18 LINDSAY M. BAILEY (SBN 285047)
19 ANNE P. BELLOWS (SBN 293722)
20 MALCOLM A. BRUDIGAM (SBN 323707)
21 LISA C. EHRLICH (SBN 270842)
22 Deputy Attorneys General
23 Attorneys for Attorney General of the State
24 of California, Rob Bonta

1 6. On March 5, 2026, Sheriff Bianco responded to the March 4 letter, indicating that he
2 would comply with the Attorney General’s directives. A true and correct copy of Sheriff
3 Bianco’s March 5, 2026, email is attached hereto as Exhibit D.

4 7. On March 19, 2026, in defiance of the Attorney General’s directives from February
5 23, March 4, and March 6, the Riverside County Sheriff’s Office applied for and obtained a third
6 warrant to seize and search materials related to the 2025 Special Election. A true and correct
7 copy of the warrant is attached hereto as Exhibit E.

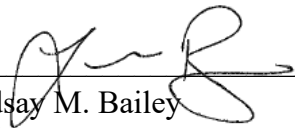
8 8. On March 20, 2026, Sheriff Bianco held a press conference to discuss his
9 investigation into the November 2025 Special Election. A video of the press conference is
10 available online at <https://www.youtube.com/watch?v=Lo6ir8fEULI>.

11 9. On March 23, 2026, Attorney General Bonta filed a Petition for Writ of Mandate in
12 the California Court of Appeal. Attorney General Bonta requested an immediate stay of the
13 Riverside County Sheriff Office’s investigation and personally served it on Sheriff Bianco, the
14 Riverside County Sheriff’s Office, and their counsel. A true and correct copy of the proof of
15 service is attached hereto as Exhibit F. The Court of Appeal ultimately denied the petition solely
16 on the basis that Petitioners had an adequate remedy in the Superior Court.

17 10. On March 24, 2026, after being personally served but before the Court of Appeal
18 issued its Order, the Riverside County Registrar of Voters informed the Attorney General’s
19 Office that Sheriff Bianco had executed the February 23 warrant and [REDACTED]

20 [REDACTED]
21 [REDACTED].

22 I declare under the laws of the State of California that the foregoing is true and correct, and
23 that this declaration was executed in Los Angeles, California, on March 26, 2026.

24
25 
26 _____
27 Lindsay M. Bailey
28 Declarant

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EXHIBIT A



February 26, 2026

Sheriff Chad Bianco
Riverside County
4095 Lemon Street
Riverside, CA 92501

████████████████████
EMAIL ONLY

RE: Warrants for Materials Related to November 2025 Special Election

Dear Sheriff Bianco:

Election integrity, and public confidence in the administration of elections, are matters of statewide concern, and I have a constitutional duty to ensure that state elections laws are adequately and uniformly enforced. As the state's chief law officer, I also have a constitutional duty to supervise county sheriffs, including authority to "direct the activities of any sheriff relative to the investigation or detection of crime within the jurisdiction of the sheriff" Gov. Code § 12560; Cal. Const. art. V, § 13.

There is no indication anywhere in the United States of widespread voter fraud. Counts, recounts, hand counts, audits and court cases all support this. My office, in partnership with the Secretary of State, holds California to the highest election standards and is committed to ensuring that state elections are safe and secure. This is why I was concerned earlier today to learn that your office executed warrants to seize approximately 1,000 boxes of ballots and other materials from the Riverside County Registrar of Voters related to the November 2025 Special Election.

We have tried unsuccessfully to work with you to understand the basis for this investigation. Today, Division of Law Enforcement Chief Stephen Woolery requested that you provide my office with copies of the affidavits supporting the probable cause determination for the subject warrants and briefly defer executing any warrants from the scheduled time of Friday, February 27, 2026 at 10 a.m. to March 6, 2026 so that we could better understand the basis for the search. We received the affidavits at 11:24 a.m. this morning. Instead of briefly delaying execution as Chief Woolery requested, however, we learned this afternoon that you accelerated your timeline and executed the warrants shortly after he made the request.

My office has reviewed the warrants issued on February 9, 2026 and February 23, 2026 and associated affidavits. We are concerned that the affidavits identify no specific felony offenses you have probable cause to believe were committed, nor do they identify particular persons whom you have probable cause to believe committed any such offenses, as required by Penal Code sections 1524(a)(4) and 1525. There also appear to be omissions of material facts in the affidavit that may have substantially interfered with the magistrate's inference-drawing

process. *Morris v. Superior Court* (1976) 57 Cal.App.3 521. [REDACTED]

I am concerned about the potential for this investigation, which is unprecedented in scope and scale, to undermine public confidence in state elections. At the same time, I take seriously any concerns about potential election irregularities, including alleged discrepancies between votes cast and votes counted in the November 2025 Special Election in Riverside County. For these reasons, it is imperative that my office have adequate time to understand the issues underlying the investigation before your office takes further steps.

Therefore, pursuant to my supervisory authority over California sheriffs set out in article V, section 13 of the California Constitution and California Government Code section 12560, I am directing you to:

- (1) preserve all ballots, documents, or other materials that have been seized by your office to date; and
- (2) pause further action in this matter until my office has had the opportunity to review it.

My office will review the matter expeditiously and be in touch with you in the coming days about next steps, including about how our offices may work together to address the allegations that gave rise to your investigation.

Please confirm your compliance with this directive by noon tomorrow (February 27).

Sincerely,



ROB BONTA
Attorney General

CC: Stephanie Nelson, Deputy County Counsel, Riverside County Counsel's Office
EMAIL [REDACTED]

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EXHIBIT B



State of California
Office of the Attorney General

ROB BONTA
ATTORNEY GENERAL

March 4, 2026

Submitted via E-Mail

The Honorable Chad Bianco
Sheriff
Riverside County
4095 Lemon Street
Riverside, CA 92501

RE: Warrants for Materials Related to November 2025 Special Election

Dear Sheriff Bianco:

I am writing as a follow up to my letter dated February 26, 2026, in which I directed you to preserve all materials seized by your office on February 26 from the Riverside County Registrar of Voters pursuant to warrants issued on February 9 and 23, 2026 (collectively, “the Warrants”). In that letter, I also directed you to pause further action until my office has had an opportunity to review the factual and legal basis for your investigation, and to confirm your compliance by mid-day on Friday, February 27. Despite repeated attempts by my office to contact you, however, I have not received a response to my February 26 letter.

As explained in my February 26 letter, based on our initial review of the Warrants and their associated affidavits, my office has serious concerns as to whether probable cause existed to support the issuance of the Warrants, and whether your office presented the magistrate with all material evidence as required by law. [REDACTED]

Earlier today, I learned that you intend to ignore my directives and plan to start counting the seized ballots tomorrow, March 5, 2026, using Sheriff’s Department staff members who are not trained and have no experience counting ballots. Let me be clear: this is unacceptable. Your decision to seize ballots and begin counting them [REDACTED]

The Honorable Chad Bianco

March 4, 2026

Page 2

[REDACTED] sets a dangerous precedent and will only sow distrust in our elections. You are also flagrantly violating my directives, notwithstanding clear, express authority in the California Constitution and the Government Code giving the Attorney General “direct supervision” over your office and authorizing me to “direct the activities of any sheriff relative to the investigation or detection of crime” in the county. (Cal. Const. art. V, § 13; Gov. Code, § 12560.)

Please notify my office by 10:00 a.m. on Thursday, March 5, 2026, that you are following my directives and are standing down all further investigative action in this matter. If I do not receive assurances that you are complying with my directives by this deadline, I am prepared to seek legal recourse in court.

Sincerely,



ROB BONTA
Attorney General

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EXHIBIT C



State of California
Office of the Attorney General

ROB BONTA
ATTORNEY GENERAL

March 6, 2026

Submitted via E-Mail

The Honorable Chad Bianco
Sheriff
Riverside County
4095 Lemon Street
Riverside, CA 92501

RE: Warrants for Materials Related to November 2025 Special Election

Dear Sheriff Bianco:

I am in receipt of your email dated March 5, 2026, in which you confirmed that you are cooperating with my directives to, among other things, pause further action in this matter. To allow my office to evaluate the legal and factual basis for your investigation pursuant to my supervisory authority under article V, section 13 of the California Constitution and section 12560 of the Government Code, please provide my office copies of the case file(s) related to (1) your current investigation into the 2025 Special Election, [REDACTED]

Specifically, please provide:

(1) All reports and supplements authored by [REDACTED], or any other member of the investigative team, on this or related investigations;

(2) [REDACTED]

(3) [REDACTED]

(4) [REDACTED]

The Honorable Chad Bianco

March 6, 2026

Page 2

[REDACTED]

(5)

[REDACTED]

Please provide these materials by email to Anthony Brady, Senior Assistant Attorney General, at [REDACTED] by March 11, 2026. Alternatively, my office can provide a link via evidence.com for upload and transfer.

Sincerely,



ROB BONTA
Attorney General

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EXHIBIT D

From: [Bianco, Chad](#)
To: [Shawna Tosten](#)
Cc: [Nelson, Stephanie](#); [Headlee, Emily](#); [Janzen, Justin](#)
Subject: Re: Warrants for Materials Related to November 2025 Special Election
Date: Thursday, March 5, 2026 1:30:33 PM

EXTERNAL EMAIL: This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Ms. Trosten,

This reply confirms I received last nights email. I can also confirm we are complying with the directive of the letter pending further communication with your office.

Chad Bianco, Sheriff

Get [Outlook for iOS](#)

From: Shawna Tosten [REDACTED]@doj.ca.gov>
Sent: Wednesday, March 4, 2026 7:31:28 PM
To: Bianco, Chad [REDACTED]@riversidesheriff.org>
Cc: Nelson, Stephanie [REDACTED]@Rivco.org>; Headlee, Emily [REDACTED]@rivco.org>; Janzen, Justin [REDACTED]@Rivco.org>
Subject: Warrants for Materials Related to November 2025 Special Election

CAUTION: This email originated from outside the **Riverside Sheriff** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Good evening,

Please see attached letter from the Attorney General, Rob Bonta, RE: Warrants for Materials Related to November 2025 Special Election.

Thank you,

Shawna Tosten

Special Assistant to the Chief Deputy Attorney General &
Chief Deputy of Operations

Office of Attorney General Rob Bonta | Department of Justice

Office: [REDACTED] Cell: [REDACTED] | Email: [REDACTED]@doj.ca.gov

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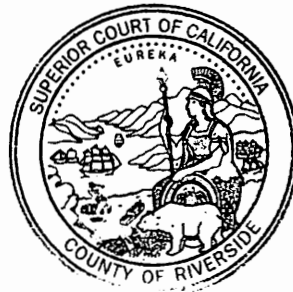
EXHIBIT E

AND TO SEIZE IT IF FOUND and bring it forthwith before me, or the appropriate courthouse within the County of Riverside. This Search Warrant and incorporated Affidavit was sworn to as true and subscribed on **March 19, 2026 at 12:32 PM**. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

IT IS FURTHER ORDERED AS INDICATED BY CHECKED ITEMS IN THAT:

- ✓ ELECTRONIC MONITORING ORDERED
- SEALING ORDERED (1040-1042)
- NIGHT SERVICE ORDERED
- DELAYED NOTIFICATION ORDERED
- NON-DISCLOSURE ORDERED
- HOBBS SEALING ORDERED
- 10 DAY RETURN OF SERVICE WAIVER ORDERED
- ✓ Return of Service Waiver - Number of Days Ordered:

90



3/19/2026
Date

[Signature]
Signature of Magistrate Signed Pursuant to 1526(c)(1)
klel

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EXHIBIT F

1 ROB BONTA (SBN 202668)
Attorney General of California
2 THOMAS S. PATTERSON (SBN 202890)
Senior Assistant Attorney General
3 PAUL STEIN (SBN 184956)
Supervising Deputy Attorney General
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Attorneys for Petitioner California
8 Attorney General Rob Bonta

9 **IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA**

10 **FOURTH APPELLATE DISTRICT, DIVISION TWO**

11 **ATTORNEY GENERAL OF THE**
12 **STATE OF CALIFORNIA, ROB**
13 **BONTA,**

14 Plaintiff(s),

15 vs.

16 **CHAD BIANCO, RIVERSIDE**
17 **COUNTY SHERIFF, THE**
18 **RIVERSIDE COUNTY SHERIFF'S**
19 **DEPARTMENT, AND SUPERIOR**
20 **COURT OF CALIFORNIA, COUNTY**
21 **OF RIVERSIDE,**

22 Defendant(s),

CASE NO: **N/A**

PROOF OF SERVICE

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PROOF OF SERVICE

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF RIVERSIDE

4 I am employed by Ace Attorney Service, Inc. in the County of Riverside,
5 State of California. I am over the age of eighteen (18) years and not a party to the
6 within action; my business address is: 800 S. Figueroa Street, Suite 900, Los
7 Angeles, CA 90017.

8 On **March 23, 2026**, I personally served the document(s) as described below:

9 SEE ATTACHED LIST OF DOCUMENTS

10 on the interested parties in this action by delivering a copy of said document(s) to the
11 party listed below:

12 Riverside County Sheriff Chad Bianco;
13 Riverside County Sheriff's Office
14 4095 Lemon Street
15 Riverside, CA 92501

16 **(BY PERSONAL DELIVERY)** I delivered such documents by hand to the offices of
17 the addressee.

18 **(STATE)** I declare under penalty of perjury under the laws of the State of California
19 that the above is true and correct.

20 Executed on March 23, 2026 at Riverside CA

21 _____
22 Justin McIntosh
23 PRINT NAME



24 _____
25 (SIGNATURE)

26 SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF RIVERSIDE
27 CASE #: N/A
28 CASE NAME: ATTORNEY GENERAL OF THE STATE OF CALIFORNIA, ROB BONTA VS CHAD BIANCO, RIVERSIDE
COUNTY SHERIFF, et al.

ATTACHED LIST OF DOCUMENTS

PETITION FOR WRIT OF MANDATE AND/OR OTHER EXTRAORDINARY RELIEF AND
REQUEST FOR EXPEDITED REVIEW MEMORANDUM OF POINTS AND AUTHORITIES
IMMEDIATE RELIEF REQUESTED – STAY OF INVESTIGATION INTO NOVEMBER 2025
SPECIAL ELECTION RESULTS IN RIVERSIDE COUNTY STAY OF EXECUTION OF
WARRANT SIGNED MARCH 19, 2026;

APPENDIX OF EXHIBITS;

APPLICATION TO FILE UNREDACTED PETITION FOR WRIT OF MANDATE AND/OR
OTHER EXTRAORDINARY RELIEF AND MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT THEREOF UNDER SEAL, ALONG WITH PUBLIC REDACTED VERSION;

APPENDIX OF EXHIBITS — PUBLIC—REDACTS MATERIAL FROM SEALED RECORD;

PETITION FOR WRIT OF MANDATE AND/OR OTHER EXTRAORDINARY RELIEF AND
REQUEST FOR EXPEDITED REVIEW MEMORANDUM OF POINTS AND AUTHORITIES
IMMEDIATE RELIEF REQUESTED – STAY OF INVESTIGATION INTO NOVEMBER 2025
SPECIAL ELECTION RESULTS IN RIVERSIDE COUNTY STAY OF EXECUTION OF
WARRANT SIGNED MARCH 19, 2026;

MOTION FOR JUDICIAL NOTICE; MEMORANDUM OF POINTS AND AUTHORITIES;
DECLARATION OF ANNE P. BELLOWS; [PROPOSED] ORDER