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*Exempt from Payment of Filing Fee  
Pursuant to Gov. Code, § 6103*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF RIVERSIDE

**ATTORNEY GENERAL OF THE STATE  
OF CALIFORNIA, ROB BONTA,**  
  
Petitioner,  
  
**v.**  
  
**CHAD BIANCO, in his official capacity as  
the Riverside County Sheriff, and THE  
RIVERSIDE COUNTY SHERIFF'S  
OFFICE,**  
  
Respondents.

Case No.  
**VERIFIED PETITION FOR WRIT OF  
MANDATE**  
  
(Civ. Proc. Code, §§ 1085, 1086)

1 This Petition for Writ of Mandate is brought by Rob Bonta, Attorney General of the State  
2 of California, and is directed to Respondents Chad Bianco, in his official capacity as the  
3 Riverside County Sheriff, and the Riverside County Sheriff’s Office.

#### 4 INTRODUCTION

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

12 2. Citing grave concerns about the legal sufficiency of the two warrants obtained by the  
13 Sheriff, and the harm to public confidence in elections that could result from a poorly supported  
14 criminal investigation, Petitioner Attorney General Rob Bonta directed Respondents to pause all  
15 work on the investigation and provide the Attorney General with a copy of the case file and  
16 related documents so he could better understand the basis of the investigation and work with the  
17 Sheriff to decide the best course of action. These directives were a lawful exercise of the  
18 Attorney General’s power to “direct[ly] supervis[e]” sheriffs “in all matters pertaining to the  
19 duties of their [] offices” (Cal. Const., art. V, § 13), including the authority to “direct the  
20 activities” of the Sheriff or “take full charge” of the investigation himself (Gov. Code, §§ 12560,  
21 12550).

22 3. Despite repeatedly representing that he would comply, Sheriff Bianco willfully  
23 violated the Attorney General’s directives and continued to abuse the criminal process. On  
24 March 19, 2026, without notifying the Attorney General, the Sheriff went to court again and  
25 obtained a third search warrant. The application for this warrant clearly violated the Attorney  
26 General’s unambiguous directive.

27 4. Then, in a press conference the following day, Sheriff Bianco publicly rejected the  
28 Attorney General’s lawful orders and announced that he would continue his investigation. He

1 told the public that a court had ordered him to carry out his planned “recount” of the number of  
2 ballots and had appointed a special master to oversee the process.<sup>1</sup> The Sheriff’s statements  
3 repeatedly confirmed the Attorney General’s concern with his criminal investigation—that the  
4 Sheriff lacked probable cause to believe that anyone has committed a crime. Rather, he told the  
5 public that the purpose of the investigation is “just as much to prove the election is accurate as it  
6 is to show otherwise,”<sup>2</sup> and that it was simply a “fact-finding mission”—which is a starkly  
7 insufficient basis to embark on a criminal investigation.<sup>3</sup>

8         5. On March 24, 2026, in continued violation of the Attorney General’s clear directive  
9 to pause all investigative activity, Sheriff Bianco seized 426 additional boxes of ballot materials  
10 from the ROV. This seizure completed execution of all three search warrants.

11         6. The Sheriff’s actions—launching an unprecedented criminal investigation into the  
12 special election without identifying any particular crime that may have been committed by  
13 anyone, and openly defying the Attorney General’s lawful directives—demand judicial  
14 intervention. Absent swift action by this Court, the Sheriff’s misguided investigation threatens to  
15 sow distrust and jeopardize public confidence in the upcoming primary and general elections, not  
16 just in Riverside County but around the State. It also sets a dangerous precedent that could invite  
17 future attempts to improperly contest election results through a misuse of law enforcement  
18 authority and the criminal process.

19         7. Mandamus is proper to compel Respondents to comply with their nondiscretionary  
20 duty to follow the Attorney General’s supervisory orders in this matter. Both the constitution and  
21 statute plainly spell out the Attorney General’s supervisory authority; the application of these  
22 provisions presents a pure question of law entirely resolving the current dispute. The Sheriff’s  
23 open defiance of California’s constitutional allocation of authority is causing serious, ongoing  
24

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25         <sup>1</sup> As described further below, the “order” referenced by Sheriff Bianco was a March 19,  
26 2026 search warrant that did not in fact order a recount or special master; it merely authorized the  
27 seizure of the same materials as two prior search warrants did, but with an enhanced (and still  
28 deficient) explanation of probable cause. All three warrants were issued by the same Judge.

<sup>2</sup> Sheriff Bianco, *Election Fraud Investigation Press Conference* (“Press Conference”),  
Riverside Cnty. Sheriff’s Off., at 05:53 (Mar. 20, 2026), <https://youtu.be/Lo6ir8fEULI?t=353>.

<sup>3</sup> *Id.* at 04:00, <https://youtu.be/Lo6ir8fEULI?t=240>.

1 harm that requires immediate redress to restore the Attorney General to his rightful supervisory  
2 role and to prevent further abuses of the criminal process.

### 3 **JURISDICTION AND VENUE**

4 8. This Court has jurisdiction over this matter pursuant to Article VI, Section 10 of the  
5 California Constitution and Sections 1085 to 1087 of the Code of Civil Procedure.

6 9. Venue is proper in this Court pursuant to Section 393, subdivision (b) of the Code of  
7 Civil Procedure because Chad Bianco, in his official capacity as the Riverside County Sheriff, is  
8 located within the County of Riverside, and Section 394, subdivision (a) of the Code of Civil  
9 Procedure because the Riverside County Sheriff's Office is situated within the County of  
10 Riverside.

### 11 **PARTIES**

12 10. Petitioner Rob Bonta, the Attorney General of the State of California, is the chief law  
13 officer of the State, and has constitutional and statutory powers to supervise county sheriffs,  
14 including the authority to "direct the activities of any sheriff relative to the investigation or  
15 detection of crime within the jurisdiction of the sheriff." (Gov. Code, § 12560; Cal. Const., art.  
16 V, § 13.)

17 11. Respondent Chad Bianco is the elected Sheriff of Riverside County, and in his  
18 official capacity is in charge of the Riverside County Sheriff's Office.

19 12. Respondent Riverside County Sheriff's Office is the law enforcement agency for the  
20 County of Riverside.

### 21 **FACTUAL BACKGROUND**

22 13. On November 4, 2025, California held a statewide special election to vote on  
23 Proposition 50, also known as the "Election Rigging Response Act," which would allow the State  
24 to use a congressional district map drawn by the Legislature for elections held between 2026  
25 through 2030. According to statewide results posted by the Secretary of State, the election  
26 resulted in 7,453,339 votes in favor of Proposition 50 (or 64.4%) and 4,116,998 votes against (or  
27 35.6%). The Secretary of State's results show that in Riverside County, the election resulted in  
28 369,565 votes in favor of Proposition 50 (or 56.3%) and 286,995 votes against (or 43.7%).

1           14. Following the election, a community group known as the Riverside Election Integrity  
2 Team (REIT) conducted a so-called “audit” of the November 2025 Special Election in Riverside  
3 County. The REIT claimed their audit showed that approximately 45,896 more ballots had been  
4 counted than cast in Riverside County.

5           15. The Elections Code provides a mechanism for electors to initiate an election contest  
6 on the basis that “there was an error in the vote-counting programs or summation of ballot  
7 counts.” (Elec. Code, § 16100, subd. (g); *id.*, §§ 16400-16467.) No election contest was initiated  
8 in Riverside County for the November 2025 Special Election.

9           16. On February 9, 2026, the Riverside County Sheriff’s Office obtained a criminal  
10 search warrant as part of a purported criminal investigation into the November 2025 Special  
11 Election in Riverside County.

12           17. On February 10, 2026, the night after the Sheriff obtained the warrant, the alleged  
13 discrepancy identified by REIT was the subject of a Riverside County Board of Supervisors  
14 meeting. In a lengthy, detailed presentation to the Board, Riverside County Registrar of Voters  
15 Art Tinoco explained that the supposed discrepancy identified by REIT was due to a number of  
16 factors, including that REIT did not have complete vote count information, it used raw data  
17 instead of the actual processed votes, and the raw data it used in the “audit” was prone to human  
18 error. He further explained that the handwritten forms upon which REIT relied to determine the  
19 number of ballots that were cast (versus counted) are not used by elections officials to determine  
20 actual vote counts.

21           18. Members of the Riverside County Sheriff’s Office were present for the ROV’s multi-  
22 hour presentation to the Board of Supervisors. Notwithstanding the ROV’s presentation, the  
23 Sheriff’s Office applied for and obtained a second search warrant on February 23, 2026.

24           19. After obtaining the two warrants, Respondents began coordinating with the ROV to  
25 obtain a first tranche of the documents identified for seizure. The ROV and Respondents  
26 mutually arranged for the Sheriff’s Office to execute the warrants as to the voted ballots at 10:00  
27 a.m. on Friday, February 27, 2026.

28

1           20. On the preceding Tuesday, February 24, 2026, the Attorney General’s Office first  
2 learned about the search warrants and Respondents’ plan to execute them. On February 25, the  
3 Attorney General, acting through Division of Law Enforcement Chief Stephen Woolery, asked  
4 Sheriff Bianco to provide copies of the probable cause affidavits that were submitted in  
5 connection with the warrant requests. Sheriff Bianco emailed the affidavits to Chief Woolery  
6 from his official email address that day.

7           21. Later that same day—Wednesday, February 25—the Attorney General, acting  
8 through Chief Woolery, called Sheriff Bianco and requested that he briefly delay execution of the  
9 warrants for one week, until March 6, 2026, to allow his office to better understand the basis for  
10 the investigation and search warrants. This was due, in part, to concerns that the affidavits failed  
11 to identify any specific felony offense Respondents had probable cause to believe had been  
12 committed and failed to identify particular persons or targets of the investigation, as required by  
13 Penal Code section 1524, subdivision (a)(4), and section 1525.

14           22. Rather than delay execution of the warrant as requested, however, Sheriff Bianco  
15 instead accelerated the timeline of the search and seized the ballots—1,000 boxes—later the same  
16 day, just a few hours after he heard from Chief Woolery.

17           23. After learning that the warrants had been executed despite his request for a brief  
18 delay, the Attorney General sent a letter via email to Sheriff Bianco the night of February 26,  
19 2026, directing him to (1) preserve all ballots, documents, or other materials that had been seized,  
20 and (2) pause further action until the Attorney General’s Office had the opportunity to review the  
21 matter. Among other things, the letter invoked the Attorney General’s supervisory authority  
22 under article V, section 13 of the California Constitution and Government Code section 12560 to  
23 “direct the activities of any sheriff relative to the investigation or detection of crime within the  
24 jurisdiction of the sheriff.” The letter requested that Sheriff Bianco confirm compliance with the  
25 Attorney General’s directives by noon on Friday, February 27, 2026, and indicated that the  
26 Attorney General would contact the Sheriff in the following days to discuss how their offices  
27 might work together to address the allegations underlying the Sheriff’s investigation.  
28

1           24. Sheriff Bianco did not respond by the requested deadline, nor did he respond to  
2 multiple subsequent attempts by the Attorney General’s Office to make contact, including phone  
3 calls Chief Woolery made to the Sheriff on Friday, February 28 and Monday, March 2.

4           25. On March 4, 2026, the Attorney General’s Office learned that Respondents planned  
5 to proceed with their investigation—notwithstanding the Attorney General’s directive to pause—  
6 the following morning by starting to count the voted ballots they had seized, and that they  
7 planned to assign 12 employees working four days a week, five to seven hours each day, to the  
8 task until completion. The Riverside County Counsel’s office, which represents the ROV,  
9 confirmed these reports.

10           26. Accordingly, on March 4, 2026, the Attorney General sent a second letter via email to  
11 Sheriff Bianco again directing him to stand down all further investigative activities. The letter  
12 requested that Sheriff Bianco notify the Attorney General’s Office of his compliance with all  
13 directives by 10:00 a.m. on Thursday, March 5, 2026, and warned him that if he failed to do so,  
14 the Attorney General was prepared to seek legal recourse.

15           27. Rather than confirming compliance on the morning of March 5, 2026, Respondents  
16 initiated their planned “recount” of ballots, according to information confirmed by the ROV.

17           28. Within a few hours, Respondents abruptly changed course. The Attorney General’s  
18 Office received an email from Sheriff Bianco at 1:30 p.m. on March 5, 2026 stating that he had  
19 received the March 4 email containing the letter from the Attorney General. Sheriff Bianco  
20 further stated, “I can also confirm we are complying with the directive of the letter pending  
21 further communication with your office.”

22           29. On March 6, 2026, the Attorney General sent a further letter via email to Sheriff  
23 Bianco directing him to provide a copy of the case file and other documents related to the matter  
24 by March 11, 2026.

25           30. Despite Sheriff Bianco’s earlier assurances of compliance, Respondents did not  
26 provide any documents by March 11, 2026, nor did they acknowledge that directive.

27           31. In an attempt to elicit compliance without litigation, Senior Assistant Attorney  
28 General Anthony Brady contacted Sheriff Bianco and eventually spoke with him on March 13,

1 2025. Sheriff Bianco informed Senior Assistant Attorney General Brady that he had not reviewed  
2 the March 6 email or letter, but that he would comply and send the requested material. Senior  
3 Assistant Attorney General Brady again emailed Sheriff Bianco the letter and requested the  
4 documents be provided by March 18, 2026.

5 32. At 9:54 p.m. on March 18, 2026, Sheriff Bianco’s private counsel provided the  
6 Attorney General with (1) copies of the Attorney General’s own February 26, March 4, and  
7 March 6 letters, and (2) a “standard operating procedure” for recounting the number of ballots  
8 that were included in the final certified results in the November 2025 Special Election. The  
9 Sheriff failed to provide any part of the case file setting out the basis for his investigation. The  
10 Sheriff’s counsel further stated that Respondents were “working on” gathering the remaining  
11 documents and that he would work to see that they were delivered “expeditiously.”

12 33. Despite the Sheriff’s previous assurance that he was standing down pending further  
13 instructions, unbeknownst to the Attorney General, the very next day the Sheriff’s Office instead  
14 went back to the Superior Court and got a third warrant.

15 34. On March 20, 2026, Sheriff Bianco convened a press conference to announce that he  
16 had obtained a further court order to continue counting the ballots, which he said would be carried  
17 out under the supervision of a special master.<sup>4</sup>

18 35. Sheriff Bianco accused the Attorney General of “interfering” and stated that “this  
19 investigation will continue despite AG Bonta’s attempts to stop it.” Sheriff Bianco also said his  
20 office was “currently working with the court in determining a special master and we will  
21 coordinate with them for the count.”

22 36. Notably, Sheriff Bianco’s statements at the press conference cast his investigation in  
23 *civil or administrative* rather than *criminal* terms. For example, he stated that his proposed  
24 recount “is basically a fact finding mission,” that “the purpose of this investigation is just as much  
25 to prove the election is accurate as it is to show otherwise,” and that “if the numbers match, we  
26 have done our due diligence to ensure the trust and confidence in our Riverside County election

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28 <sup>4</sup> A video of the press conference is available online at  
<https://www.youtube.com/watch?v=Lo6ir8fEULI>

1 elections.” These statements align with the Attorney General’s assessment that Respondents have  
2 uncovered no evidence tending to suggest that *any* felony crime occurred.

3 37. The Attorney General’s Office obtained a copy of the new “court order,” which is a  
4 third search warrant signed on March 19, 2026.

5 38. As with the earlier warrants, the affidavit submitted in support of the March 19, 2026  
6 warrant fails to identify any specific felony or any specific person who the Sheriff has probable  
7 cause to believe committed a criminal offense. (See Pen. Code, §§ 1524, subd. (a)(4), 1525.)  
8 And despite the Sheriff’s public statements, the March 19, 2026 warrant did not order a recount  
9 or authorize a special master—it merely permitted the Sheriff to seize the same materials listed in  
10 the first and second warrants.

11 39. Respondents have not provided the Attorney General’s Office with a full record of  
12 the court filings related to this matter, which the Attorney General believes to be sealed.

13 40. As of today, Respondents still have not provided the case file and related documents  
14 requested by the Attorney General. The Attorney General lacks knowledge as to whether a  
15 special master has been appointed and whether the recount has started.

16 41. The Attorney General filed a petition for writ of mandate on March 23, 2026, asking  
17 the California Court of Appeal, Fourth Appellate District, Division Two to order the Sheriff to  
18 comply with the Attorney General’s constitutional and statutorily mandated directives, as the  
19 matter presents a purely legal question of constitutional and statutory authority that “[is] of great  
20 public importance and should be resolved promptly.” (*Cal. Labor Federation v. Occupational*  
21 *Safety & Health Stds. Bd.* (1990) 221 Cal.App.3d 1547, 1555.)

22 42. While the petition for writ of mandate was pending with the Court of Appeal, and  
23 despite the Attorney General’s express direction to pause all investigative activity, Sheriff Bianco  
24 seized 426 additional boxes of ballot materials from the ROV on the morning of March 24, 2026.  
25 These additional 426 boxes completed the seizure of all the materials listed in the three search  
26 warrants.

27 43. The Court of Appeal denied the writ on March 24, 2026, stating the Attorney General  
28 did not demonstrate “lack[] [of] an adequate remedy in the superior court.”

1 **CAUSE OF ACTION**

2 **Writ of Mandate (Code of Civil Procedure §§ 1085, 1086)**

3 **[Against All Respondents]**

4 44. Petitioner re-alleges all paragraphs set forth above and incorporates them by reference  
5 as though they were fully set forth in this cause of action.

6 45. The California Constitution designates the Attorney General as “the chief law officer  
7 of the State.” (Cal. Const., art. V, § 13.) It further provides that it “shall be the duty of the  
8 Attorney General to see that the laws of the State are uniformly and adequately enforced,” and to  
9 that end, the Constitution gives the Attorney General “direct supervision” over sheriffs, district  
10 attorneys, and other law enforcement officers in California, “in all matters pertaining to the duties  
11 of their respective offices.” (*Ibid.*)

12 46. Implementing that power, the Government Code further provides that “[w]hen  
13 the Attorney General deems it necessary in the public interest the Attorney General shall direct  
14 the activities of any sheriff relative to the investigation or detection of crime within the  
15 jurisdiction of the sheriff, and may direct the service of subpoenas, warrants of arrest, or other  
16 processes of court in connection therewith.” (Gov. Code, § 12560.)

17 47. These provisions “give[] the Attorney General ‘direct supervision’ of all sheriffs.”  
18 (See *Venegas v. County of Los Angeles* (2004) 32 Cal.4th 820, 834 [holding, based in part on the  
19 Attorney General’s supervisory power, that sheriffs are state officers for purposes of 42 U.S.C. §  
20 1983].)

21 48. The plain language of the California Constitution and the Government Code authorize  
22 the Attorney General to direct Sheriff Bianco to pause his investigation into the November 2025  
23 Special Election, including his recount of the ballots, to preserve all seized materials, and to  
24 provide documents to the Attorney General to enable his office to review the matter. The  
25 Attorney General validly exercised his supervisory power here, and Sheriff Bianco has a  
26 mandatory duty to comply with the Attorney General’s directives.

27 49. A directive issued by the Attorney General pursuant to his constitutional and statutory  
28 authority creates a clear, present, and ministerial duty for the Sheriff to act in a particular way,

1 and the Attorney General has a clear, present, and beneficial right to performance of that duty,  
2 such that mandamus relief is appropriate. (*Riverside Sheriff's Assn. v. County of Riverside* (2003)  
3 106 Cal.App.4th 1285, 1289.) There is no other plain, speedy, and adequate remedy at law for  
4 the Attorney General to enforce his supervisory authority. (Code Civ. Proc., § 1086.)

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Petitioner prays for judgment as follows:

7 1. For a writ of mandate, or other extraordinary relief as warranted, directing  
8 Respondents Sheriff Chad Bianco and the Riverside County Sheriff's Office to comply with the  
9 Attorney General's supervisory directives to (1) take no further action on the investigation of the  
10 November 2025 Special Election in Riverside County pending the Attorney General's review, (2)  
11 preserve all documents and ballots seized to date, and (3) immediately provide the Attorney  
12 General's Office with the documents requested in his March 6 letter;

13 2. Issue a writ of mandate, or other extraordinary relief as warranted, directing  
14 Respondents Sheriff Chad Bianco and the Riverside County Sheriff's Office to comply with all  
15 subsequent supervisory directives issued by the Attorney General related to this matter;

16 3. For such other and further relief as the Court deems just and proper.

17  
18 Dated: March 26, 2026

Respectfully submitted,

19 ROB BONTA  
20 Attorney General of California  
21 THOMAS S. PATTERSON  
22 Senior Assistant Attorney General  
23 PAUL STEIN  
24 ANYA BINSACCA  
25 Supervising Deputy Attorneys General  
26 ANNE P. BELLOWS  
27 MALCOLM A. BRUDIGAM  
28 LISA C. EHRLICH  
Deputy Attorneys General



LINDSAY M. BAILEY  
Deputy Attorney General  
*Attorneys for*  
*Attorney General of the State of California,*  
*Rob Bonta*

1 **VERIFICATION**

2 I, Lindsay M. Bailey, declare:

3 I am counsel for the Petitioner in this action. I have read the foregoing Petition for Writ of  
4 Mandate and am familiar with the contents thereof. The facts alleged in the petition are within  
5 my own knowledge and I know those facts to be true, and on that ground allege that the contents  
6 contained therein are true.

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

9  
10 Dated: March 26, 2026

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13 Lindsay M. Bailey  
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