

No. 295866

IN THE SUPREME COURT  
OF THE STATE OF CALIFORNIA

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CLARISSA CERVANTES, OSCAR ORTIZ, REBECCA  
ROBINSON, AND NATHAN KEMPE

*Petitioners,*

vs.

CHAD BIANCO, IN HIS OFFICIAL CAPACITY AS  
RIVERSIDE COUNTY SHERIFF, AND ART TINOCO, IN  
HIS OFFICIAL CAPACITY AS RIVERSIDE COUNTY  
REGISTRAR OF VOTERS

*Respondents.*

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DECLARATION OF SHERIFF CHAD BIANCO IN  
SUPPORT OF RESPONDENTS' PRELIMINARY  
OPPOSITION TO PETITION FOR WRIT OF MANDATE  
AND/OR OTHER EXTRAORDINARY RELIEF AND  
REQUEST FOR EXPEDITED REVIEW; MEMORANDUM  
OF POINTS AND AUTHORITIES

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Attorneys for *Respondents County Sheriff Chad Bianco*

*March 26, 2026*

I, Sheriff Chad Bianco, the undersigned declared as follows:

1. I am over the age of eighteen years, and the active sheriff for Riverside County, California. I make this declaration based upon my personal firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. As Sheriff, I head the Riverside Sheriff's Department ("RSO").

3. RSO obtained and executed two judicial search warrants authorizing seizure of ballots and other election materials from the Riverside County Registrar of Voters ("ROV") related to the November 2025 Special Election.

4. RSO's investigation was premised on credible evidence that the number of physical ballots may be approximately 45,896 fewer than the total votes certified by the ROV for the November 2025 Special Election. Investigators were assigned to investigate this claim. Investigators reviewed evidence and performed interviews of relevant individuals.

5. The ROV warrants were obtained after an audit of the 2025 Special Election was performed by a group of election observers. The audit appears to reasonably demonstrate that the ROV's internal logs for counting the total number of ballots cast in the election did not match the ROV's certified results.

6. The internal handwritten logs prepared by ROV personnel are derived and reflect a physical count of ballots in accordance with the ROV's established practice for the 2025 Special Election. The same group of observers asserted that their

findings after an audit of the immediately preceding election resulted in a similar discrepancy of more than 30,000 votes.

7. After some investigation, RSO sought warrants to investigate the alleged discrepancies to determine whether there is in fact an actual discrepancy.

8. If true, we believe this investigation could likely lead to evidence of a felony having occurred in the 2025 Special Elections.

9. The warrant was granted by a Riverside Superior Court Judge and RSO seized the ballots in accordance with the warrant.

10. RSO believes the lack of reconciliation between certified vote totals and the ballot-accounting records and/or the number of physical ballots constitutes evidence of one or more felony violations of California law.

11. A controlled count of the seized ballots, coupled with comparison to certified totals and ballot-accounting records, is a direct and minimally intrusive method to test whether this discrepancy exists and, if so, to quantify it reliably.

12. RSO complied with the Attorney General's demand that the ballots not be counted.

13. RSO has preserved the evidence, consistent with the Attorney General's request that the RSO preserve the seized materials.

14. RSO will be providing a report of this paused investigation to the Attorney General as requested.

15. On March 26, 2026, the Attorney General filed for a writ of mandate in Riverside County Superior Court concerning the ballots and this criminal investigation. *Att’y General Rob Bonta v. Chad Bianco*, No. CVRI2601580 (filed Mar. 26, 2026).

16. RSO will not do any counting and has paused its investigation pending the resolution of the writ of mandate.

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

Executed March 26, 2026, at Riverside, California.

  
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Sheriff Chad Bianco

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**CERTIFICATE OF SERVICE**

I am an employee in the County of Riverside. I am over the age of 18 years and not a party to the within entitled action; my business address is 25026 Las Brisas Road, Murrieta, California 92562.

On March 26, 2026, I served a copy of the following document(s) described as:

**DECLARATION OF SHERIFF CHAD BIANCO IN  
SUPPORT OF RESPONDENTS' PRELIMINARY  
OPPOSITION TO PETITION FOR WRIT OF MANDATE  
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on the interested party(ies) in this action by-email or electronic service [C.C.P. § 1010.6; CRC 2.250-2.261]. The documents listed above were transmitted via e-mail to the e-mail addresses on the attached service list.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am an employee in the office of a member of the bar of this Court who directed this service.

*Susan Kenney*  
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Susan Y. Kenney

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