No. 295866

IN THE SUPREME COURT OF CALIFORNIA

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

Petitioners,

v.

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

Respondents,

REPLY TO RESPONDENT SHERIFF CHAD BIANCO'S PRELIMINARY OPPOSITION

IMMEDIATE RELIEF REQUESTED – STAY OF BALLOT SEIZURE AND HANDLING

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March 30, 2026

CERTIFICATE OF INTERESTED ENTITIES

Pursuant to California Rule of Court 8.208, the UCLA Voting Rights Project certifies that they know of no entity or person, other than the parties themselves, that has a financial or other interest in the outcome of the proceeding that he reasonably believes the justices should consider in determining whether to disqualify themselves under canon 3E of the Code of Judicial Ethics**.**

Respectfully submitted,

/s/ Sonni Waknin
SONNI WAKNIN

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I. INTRODUCTION

"Openness in government is essential to the functioning of a democracy… 'access permits checks against the arbitrary exercise of official power and secrecy in the political process.'" (*Int'l Fed'n of Pro. & Tech. Eng'rs, Loc. 21, AFL-CIO v. Superior Ct.* (2007) 42 Cal. 4th 319, 328–29). Respondent Bianco's lodges jurisdictional arguments to Petitioners' Petition for Writ of Mandate rather than address the merits of this case in hopes that this Court will allow him to act unchecked.

But this Court's intervention now is essential. Petitioners ask this Court to address the question of whether Respondent Bianco may seize, likely all, voted ballots in Riverside County from the 2025 Special Election from the Riverside County Registrar of Voters, admit to handling and counting those ballots, and then under the guise of an investigation, petition a superior court for a closed door improper recount allegedly administered by a "special master."

In just the last week, Bianco seized (and Tinoco facilitated) 426 *additional* boxes of election materials. (*See* Nick Corasaniti, *Sheriff in California Seizes More Ballots, Ignoring State Attorney General*, New York Times, March 26, 2026, https://www.nytimes.com/2026/03/26/us/politics/california-sheriff-ballots-attorney-general.html.) Moreover, the same reporting calls into question whether even a special master was appointed— contrary to what Bianco

claimed in a recorded oral statement. (*See id.*) From the start, Bianco's public statements have been inconsistent, misleading, or demonstrably false. Indeed, Bianco's declaratory statement here contradicts his public actions. (*Compare* Dec. of Chad Bianco, *Cervantes v. Bianco* (March 26, 2026, S295866) at ¶ 16 to Associated Press, *California and a Voting Rights Group Filed Legal Challenges to stop GOP Sheriff's Ballot Seizure"* CNN, Mar. 27, 2026, https://www.cnn.com/2026/03/27/us/california-sheriff-ballot-seizure-challengedseized [Bianco stating that "his office would physically count the ballots and compare the results with the total voters reported to the state" done by Riverside Sheriff's officials.].) Given these recent events, the Court should issue a temporary stay to ensure that no more election materials leave the custody of election officials and to ensure nothing more happens with the seized materials.

Petitioners seek extraordinary relief because the circumstances demand it. Every day these voted ballots and election materials remain in a proverbial dark room, not under the careful supervision of sworn and trained election staff nor being handled pursuant to carefully balanced election laws, there is irreparable damage to public perception of elections and diminishment of any evidentiary value the seized election materials still hold.

This Court is the only court able to timely and adequately address the actions by Bianco and Tinoco and therefore ensure that the election

laws of California are followed. Bianco's Preliminary Opposition is unpersuasive and inaccurate. Petitioners have standing to bring this suit as valid electors under California Election law. Furthermore, Petitioners' claims are ripe for mandamus relief; Petitioners will be unable to seek speedy relief from a lower court. Third, Petitioners' Writ for Mandate is meritorious.

II. ARGUMENT

A. Petitioners have standing.

Petitioners have standing to bring this suit.

1. Petitioners are Suffering Concrete and Particularized Injuries.

To demonstrate standing a "plaintiff must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and (3) that is likely to be redressed by a favorable judicial decision." (*Limon v. Circle K Stores Inc.* (2022) 84 Cal. App. 5th 671, 689–90.) "In order to have standing, the plaintiff must be able to allege injury—that is, some 'invasion of the plaintiff's legally protected interests." (*Angelucci v. Century Supper Club* (2007) 41 Cal. 4th 160, 175 [citing 5 Witkin, Cal. Procedure (4th ed. 1997) Pleading, § 862, p. 320; *see also,* Code Civ. Proc., § 367].)

Maintaining secrecy of the ballot, protecting their own right to vote, ensuring that their vote is lawfully handled, and protecting an accurate

count of their votes are legally protected interests. (*See* Cal. Const. art. 2, §§ 2.5 and 7). As this court has found, "secrecy of the ballot is one of the cardinal principles upon which the present ballot law is founded, and thoroughly permeates the entire body of the act." (*Farnham v. Boland* (1901) 134 Cal. 151, 152.) Voting "is regarded as a fundamental political right, because [it is] preservative of all rights." (*Yick Wo v. Hopkins* (1886) 118 U.S. 356, 370.)

Petitioners actual cast ballots are being held and handled by Bianco and his unknown, non-election trained and sworn staff. As the Petition notes, none of the critical Elections Code requirements for the handling of ballots are being followed. Petitioners are experiencing jeopardy of their own ballot secrecy. Petitioners' votes are subject to recount and contest procedures that do not comply with law. All of this is happening outside the view of qualified election observers and without the redundant count teams and election records prescribed by law. Further, the transfer and handling of Petitioners' ballots threaten to diminish their weight in an election tally, or a criminal case, if one is even justified. These harms are real.

Petitioners are easily able to show that their rights are traceable to the actions of Bianco (who seized the ballots) and Tinoco (who allowed the ballots to be seized, without engaging in a proper legal defense, despite his lawful custody). A judicial order from this Court mandating that the ballots

be placed back in the custody of Tinoco and any handling of ballots occur in accordance with state laws would redress Petitioners' harms.

Contrary to Bianco's argument, the harms Petitioners suffer here are not generalized simply because other Riverside voters are also affected. (*See* Prelim. Opp. at 11.) A generalized harm would be one in which a voter from elsewhere in the state brought a petition for writ of mandate over Bianco's impermissible seizure of cast ballots from the Riverside County Registrar of Voters. Here, the Petitioners are the very persons whose ballots are caught in this dragnet. Petitioners and other electors in Riverside County have a particularized injury precisely because it is their votes being mishandled.

Moreover, a malfeasor cannot escape legal redress merely because his wrongful conduct harms a large number of people. A large number of claimants bringing suit to assert their claims is not unusual. The law recognizes standing on claims that are brought by hundreds of thousands of class members. Numerosity is not prohibitive. (*See United States v. Students Challenging Regul. Agency Procs. (SCRAP)* (1973) 412 U.S. 669, 688 ["To deny standing to persons who are in fact injured simply because many others are also injured, would mean that the most injurious and widespread Government actions could be questioned by nobody."].) The fact that these Petitioners are suffering these harms along with about 650,000 other Riverside County voters does not count against Plaintiffs'

standing; instead, the staggering scope of Respondents' conduct reveals the critical need for this Court to grant relief.

Also, Petitioners are a "beneficially interested" party under Civil Procedure § 1086. They have a right to their voted ballot being handled, stored, and not shared in order to keep their ballot secret. "The requirement that a petitioner be 'beneficially interested' has been generally interpreted to mean that one may obtain the writ only if the person has some special interest to be served or some particular right to be preserved or protected over and above the interest held in common with the public at large… 'One who is in fact adversely affected by governmental action should have standing to challenge that action if it is judicially reviewable'." (*Save the Plastic Bag Coal. v. City of Manhattan Beach* (2011) 52 Cal. 4th 155, 165 [quoting Davis, 3 Administrative Law Treatise (1958) p. 291].)

Voters seeking to mandate election registrars follow the law with respect to them personally are entitled to mandamus relief. (*See Jolicoeur v. Mihaly* (1971) 5 Cal. 3d 565, 570 n. 2 [finding that "Mandamus is clearly the proper remedy for compelling an officer to conduct an election according to law" because "[v]oting registrars are public officers with the ministerial duty of permitting qualified voters to register."].) From registration to counting to permanent storage, voters have standing to require public officers to follow adopted statutes for the handling of election records.

2. The *Common Cause* Case Cited by Respondents Supports Standing.

Respondent Bianco heavily relies on *Common Cause v. Board of Supervisors* (1989) 49 Cal. 3d 432, 439, and argues, for example: "[w]here the invoking parties only claimed injury is a generalized grievance shared equally with hundreds of thousands of other voters, the constitutional barrier to judicial cognizance remains regardless of what the statute provides." (Prelim. Opp. at 17 *citing Common Cause*, 49 Cal. 3d at 441–42.) Bianco misreads and misrepresents the holding in *Common Cause.*

It cannot be reasonably claimed that the court found the Common Cause Plaintiffs lacked standing because of their number or that they asserted a generalized grievance. Instead, the central holding of this Court on standing was:

> We find it unnecessary to reach the question whether plaintiffs have standing to seek an injunction under Code of Civil Procedure section 526a, because there is an independent basis for permitting them to proceed. The ultimate relief sought in this action includes a writ of mandate compelling adoption of the employee deputization program. *'[Where] the question is one of public right and the object of the mandamus is to procure the enforcement of a public duty, the relator need not show that he has any legal or special interest in the result*, since it is sufficient that he is interested as a citizen in having the laws executed and the duty in question enforced . . . .'" The question in this case involves a public right to voter outreach programs, and plaintiffs have standing as citizens to seek its vindication.

(*Common Cause v. Bd. of Supervisors*, (1989) 49 Cal. 3d 432, 439 (cleaned up and emphasis added.) The *Common Cause* holding is inapposite with

Bianco's standing arguments; instead that case demonstrates these Petitioners have standing.

Additionally, none of the quotations cited by Respondent from the *Common Cause v. Board of Supervisors* case can be found within the text of the case. For example, in the Preliminary Opposition at page 13, Bianco presents this quote: "a grievance shared in substantially equal measure by all or a large class of citizens." This appears nowhere in the opinion.[1]

Moreover, the fact that other persons may share a similar injury, does not mean that such an injury is a generalized grievance. Respondent's argument would lead to the result that no Riverside County voter would have standing to challenge the seizure of their ballot, leaving Bianco's actions virtually immune to challenge. This Court cannot accept such a conclusion.

[1] This is a concerning pattern throughout Respondent's brief. Several cases cited in the brief reference real cases but point to non-existent quotes and made-up holdings. Several citations are to cases that do not stand for the proposition Respondent represents. For example, Respondent cites to *County of Alameda v. Carleson* (1971) 5 Cal. 3d 730, 737, to lay out the requirements of Code of Civil Procedure § 367, but § 367 is not mentioned in this case. Respondent also cites to *Edelstein v. City and County of San Francisco* (2002) 29 Cal. 4th 164, 174-75 for the proposition that standing provisions in the elections cases ought to be interpreted in light of constitutional requirements, but the pages cited to instead discuss the *Anderson-Burdick* test.

The broad notion of standing in California, as demonstrated by this Court's holding in *Common Cause*, permits affected voters in Riverside who had their ballot illegally seized to vindicate their rights.

3. Section 13314 of the Elections Code Confers Standing.

Contrary to Respondent's argument, Elections Code section 13314 confers standing on Petitioners. (Prelim. Opp. at 17.) Section 13314 specifically authorizes electors to bring a petition for writ of mandamus for "any neglect of duty has occurred, or is about to occur." (Elec. Code § 13314, subd. (a)(1).) In *Kunde v. Seiler*, the Fourth District Court of Appeal found that a plaintiff who alleged violations of the Elections Code and claimed that a registrar had neglected her duty, had "standing to pursue [their] action based on section 13314." (*Kunde v. Seiler* (2011) 197 Cal. App. 4th 518, 529.) Here, Petitioners allege Bianco is violating numerous provisions of the Elections Code. Petitioners also claim that Tinoco did not meet his statutory duty (and may not again since the most recent failure was a few days ago) to ensure that ballots remain in the custody of the county registrar of voters. Both of these allegations fairly state claims for which Petitioners have standing under Section 13314.

Second, despite Respondents assertions otherwise, section 13314 extends to the conduct of Respondent Bianco. Under section 13314 subsection (a)(1): "[a]n elector may seek a writ of mandate alleging that an error or omission has occurred… or that any neglect of duty has occurred,

or is about to occur." Bianco as a government official has a duty to follow the law, including the Elections Code. (*See People for Ethical Operation of Prosecutors etc. v. Spitzer* (2020) 53 Cal. App. 5th 391, 401, *as modified* (Sept. 8, 2020) ["It is elementary that public officials must themselves obey the law."].) Even were this not true, Respondent Tinoco plainly is a properly subject to an order under section 13314, because he has the statutory authority to hold and handle ballots.

Third, Petitioners satisfy the beneficial interest requirement.[2] As stated *supra*, Petitioners are injured in fact by the seizure of their voted ballots by Bianco and that injury is actualized because Bianco is *still* in custody of Petitioners' cast ballots in violation of California election law. Thus, Petitioners have demonstrated they are a beneficially interested party. Nevertheless, the beneficial interest requirement does not apply here because Petitioners have public interest standing, as explained *infra*.

4. Petitioners have Standing Under the Public Interest Exemption.

Even if section 13314 does not confer standing, Petitioners have public interest standing to seek a writ of mandate. California courts have long recognized that "'where the question is one of public right and the object of

[2] Respondent cites *Carrancho v. California Air Resources Board* to contend that there is a mandamus-specific beneficial interest requirement that must be satisfied regardless of statutory authorization. (Prelim. Opp. at 18). But *Carrancho* has no such assertion—standing is not even mentioned in the opinion.

the mandamus is to procure the enforcement of a public duty, the relator need not show that he has any legal or special interest in the result, since it is sufficient that he is interested as a citizen in having the laws executed and the duty in question enforced.'" (*Green v. Obledo* (1981) 29 Cal. 3d 126, 144). This is called "public interest standing" or the "public interest exemption." The purpose of the public interest and/or public right exemption is to ensure "the policy of guaranteeing citizens the opportunity to ensure that no governmental body impairs or defeats the purpose of legislation establishing a public right." (*Save the Plastic Bag Coal. v. City of Manhattan Beach* (2011) 52 Cal. 4th 155, 166.)

In determining whether the public interest standing applies, courts ask whether the public duty is sharp and the public need is weighty. (*Citizens for Amending Proposition L v. City of Pomona* (2018) 28 Cal. App. 5th 1159, 1174.). "When the duty is sharp and the public need weighty, the courts will grant a mandamus at the behest of an applicant who shows no greater personal interest than that of a citizen who wants the law enforced." (*McDonald v. Stockton Met. Transit Dist.* (1973) 36 Cal. App. 3d 436, 440.)

Voters seeking mandamus have easily demonstrated public interest standing. (*See generally Vandermost v. Bowen* (2012) 53 Cal. 4th 421, 451 ["the representations disclosed by the petition demonstrated that petitioner, as a registered voter and the official proponent of the proposed referendum

in question, unquestionably had standing to file a petition for an original writ of mandate seeking the relief in question under the so-called "public-interest exception" applicable to mandate proceedings."]; *Patterson v. Padilla* (2019) 8 Cal. 5th 220, 247, fn. 20 [Stating that a respondent's standing arguments against a petitioner who was an individual voter seeking to ensure that a candidate's name would be printed on California primary ballot "lack merit" citing to Code Civ. Proc., § 1086 and Elec. Code, § 13314, subd. (a)(1)]; *Citizens for Amending Proposition L v. City of Pomona* (2018) 28 Cal. App. 5th 1159, 1192 [Finding public interest standing because "effectuating the voters' right to enforce Proposition L conferred a significant benefit on the general public."].)

Respondent ignores the public interest exemption while extensively citing to *Common Cause v. Board of Supervisors* to support his assertion that Petitioners lack standing. But as explained *supra, Common Cause* directly finds that voters seeking to enforce elections laws satisfy the requirements for public interest standing. (*Common Cause,* 49 Cal. at 432.)

Petitioners plainly have standing to obtain Court relief to have their own ballots handled, stored, and counted in a manner that was prescribed by the California Legislature.

B. Petitioners have Demonstrated That There Is No Other Plain, Speedy, and Adequate Remedy.

Petitioners have no other plain, speedy, and adequate remedy besides a writ of mandate from this court. Respondent insists that because this case concerns election law, Petitioners should have sought to file their writ in the lower courts (Prelim. Opp. at 19-20). Not so.

California law recognizes two circumstances where a petitioner lacks a "plain, speedy, and adequate remedy" at law, such that a writ of mandate is the appropriate remedy. First, when the dispute involves matters of statewide importance requiring prompt resolution. (*See California Priv. Prot. Agency v. Superior Ct.* (2024) 99 Cal. App. 5th 705, 719, *review denied* (Apr. 24, 2024); *Henry M. Lee Law Corp. v. Superior Court* (2012) 204 Cal. App. 4th 1375, 1382–1383; *see also Dhillon v. John Muir Health* (2017) 2 Cal. 5th 1109, 1119; *JSM Tuscany, LLC v. Superior Court* (2011) 193 Cal. App. 4th 1222, 1235–1236; *Los Angeles City Ethics Com. v. Superior Court* (1992) 8 Cal. App. 4th 1287, 1299.) Second, when constitutional violations in the election process require immediate intervention that ordinary litigation cannot provide. (*Wenke v. Hitchcock*, (1972) 6 Cal. 3d 746, *Hoffman v. State Bar of California*, (2003) 113 Cal. App. 4th 630.)

Both of those circumstances exist here. First, the dispute in this case concerning whether an elected sheriff can interfere with election administration, blatantly seize custody of cast ballots, and continue to disregard election law and seize more materials each week until they are

satisfied, is of tantamount statewide important. This is exactly the kind of case that this court has found to be of great public importance such that a writ of mandate is appropriate.

In *Wenke v. Hitchcock*, (1972) 6 Cal.3d 746, this Court issued a peremptory writ of mandate requiring a county registrar of voters to accept nomination papers from a candidate seeking election to a county supervisor office in Orange County. In granting that petition, the Court found that "[c]ases affecting the right to vote and the method of conducting elections are obviously of great public importance." (*Wenke*, 6 Cal.3d at 750 [emphasis added] [quoting *Jolicoeur v. Mihaly*, (1971) 5 Cal.3d 565, 570 n.1].) The Court further noted that "[m]andamus is clearly the proper remedy for compelling an officer to conduct an election according to law." (*Wenke*, 6 Cal. 3d at 751.)

This case directly impacts the public perception of the reported election results and election interference. As important, the resolution of this case impacts the upcoming elections which could be disrupted irrevocably by a local officer taking actions during voting, tabulation or canvass. Resolution of these questions now, in this case, is necessary to avoid what may turn into a wave of law enforcement ballot seizure.

The fact that another writ petition was denied in the court of appeals, as argued by Bianco, is irrelevant. (*See* Prelim. Opp. at 19.) The legal issues in that petition were on different grounds. In that proceeding, the attorney

general claimed relief based on his authority of supervision over county officers and criminal investigations. The fact that the court determined the attorney general should proceed on those arguments first in the trial court has no bearing on this case.[3]

Second, the rights of these Petitioners cannot be vindicated in the Riverside County Superior Court. These voters likely do not have standing to intervene in the criminal proceeding and any subsequent criminal prosecution that may result. Even if they did, the Elections Code provides: "Venue for a proceeding under this section shall be exclusively in Sacramento County in any of the following cases: … A statewide measure that is to be placed on the ballot is the subject of the proceeding." (Elec. Code, § 13314, subd. (b)(3).) This Court should not caution the procedural delays possibly conflicting orders from lower courts would cause; the fact Petitioners' rights would face ongoing harm while proceedings in these competing courts played out, demonstrates that Petitioners have no other plain, speedy, and adequate remedy besides a writ of mandate from this court.

C. Petitioners are Owed a Ministerial Duty by Sherriff Chad Bianco.

[3] Indeed, the attorney general is similarly seeking relief from this court acknowledging the need for a speedy resolution of the pressing issue. (See generally Pet., *Atty. General of California v. Bianco* (March 27, 2026, S295901.)

Petitioners are owed a ministerial duty by Bianco to 1) return their cast ballots to the custody of Tinoco, 2) to refrain from causing any election material removal going forward other than through the process provided in the Elections Code and 3) refrain from conducting a tally or recount of ballots in a manner not provided for in the Elections Code. Bianco argues that he owes Petitioners no duty and that rather he is following his duty to investigate crimes. But the Elections Codes creates an express duty for those who are involved in criminal prosecutions to not take custody of cast ballots from elections officials.

"A ministerial act is one that a public officer is required to perform in a prescribed manner in obedience to the mandate of legal authority, without regard to his or her own judgment or opinion. Mandate is also available to correct those acts and decisions of [government agents] that violate the law." (*Morgan v. Bd. of Pension Comrs*, (2000) 85 Cal. App. 4th 836, 837–38.)

Under Section 15551 of the Elections Code, "[i]f a contest or *any such criminal prosecution* has been commenced prior to the date fixed for its destruction, the package containing voted ballots shall be subject to the order of the court in which the contest or criminal prosecution is pending…[i]n no event shall the package or its contents be taken from the custody of the elections officials" (emphasis added.) Who else would this law apply to if not law enforcement officers? The legislature's mandate that

"in no event" should election officials be divested of voted ballots in a criminal prosecution could not reasonably apply to any one other than law enforcement and prosecutors. Worse still, Bianco is not even operating under a criminal prosecution, merely an alleged criminal "investigation."

It is Bianco's duty to present authority that gives him basis to take action that conflicts with the Elections Code. He does not even attempt to do so because no such authority exists. A county sheriff is not vested with plenary power to do what he wants. He too is constricted by the constitution and statutes. Bianco's Preliminary Response fails to offer any legal basis for his actions other than vague reference to his authority to investigate crimes. Other states have been diligent to restrict local officials who facilitate the right to vote; this court is plainly justified to constrict the actions of local officials that harm the right to vote and also endanger the public perception of orderly elections. (*See e.g, State v. Hollins* (Tex. 2020) 620 S.W.3d 400, 404 ["Before a county official can take "any action," that action's "legal basis . . . must be grounded ultimately in the constitution or statutes."].)

Elections Code violations should not be tolerated especially for this "criminal investigation." Bianco's own declaration shows this investigation rests on the thinnest reed. (*See* Dec. of Chad Bianco, *Cervantes v. Bianco* (March 26, 2026, S295866.) Indeed, the Respondent makes no attempt to reconcile the clear Elections Code provisions with a

particular need in this alleged criminal investigation. In fact, Bianco's declaration reveals his investigation is based on nothing more than already discredited innuendo. (*See* Riverside County Board of Supervisor Meeting, Registrar of Voters Elections Update (Feb 10, 2025), at 3:39:00 to 3:41:14, https://riversidecountyca.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=3355&Format=Agenda.) Bianco should have a much more substantial basis for his actions than those offered in his declaration.

California's election code is painstakingly thorough regarding the handling, counting and recounting of voted ballots. Election provisions like these are common across the states. They have developed over decades of live and learn. They are not advisory guidance any sheriff may ignore. (*See e.g.* Elections Code § 15370 [stating that after ballots are counted, ballots may not be opened except for a recount or in the event of defective materials.]; Elections Code § 15600-15649 [designating particular scenarios and procedure required to not only conduct a recount but the process required for actually performing the recount.]

In addition to these protections, the California Election's Code seeks to close any gaps in protections by allowing the secretary of state to adopt further procedures to protect ballots in the event of a recount. (Elections Code § 15601, subd. (b).) As a result, the secretary of state adopted thorough procedures outlined in the California Code of Regulations to ensure the sanctity of the election and that votes are protected. Among the

many provisions outlined by the secretary of state are those establishing the order of a recount, (20354) the location of the recount, (20356) the security and staffing needed for a recount (20357-58) and the scheduling of the recount. (*See* 2 CCR § 20354 and 20356-20359.)

California law does not sanction unsupervised inspection of election records by *anyone,* much less personnel who are not sworn and trained election officials. The legislature did not fail to contemplate criminal proceedings around elections. (See Elec. Code § 15551, 15630, 15640) Instead, the legislature prescribed what is to happen with election records in the criminal context. It is Respondents' duty, not subject to their discretion, to follow these prescriptions.

III. CONCLUSION

For the forgoing reasons, this court should issue a writ of mandate directing Respondents Bianco and Tinoco to comply with California election law and place cast ballots back in the custody of Respondent Tinoco.

Dated: March 30, 2026

Respectfully submitted,

UCLA Voting Rights Project

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VERIFICATION

I, Sonni Waknin, declare:

I am counsel for the Petitioners in this action. I have read the foregoing Reply to Respondent Sheriff Chad Bianco's Preliminary Opposition to Petition for Writ of Mandate and/or Extraordinary Relief and Request for Expedited Review and am familiar with its contents. The facts alleged in the petition are within my knowledge and I know those facts to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. I declare that this verification was executed on March 30, 2026, in Los Angeles, California.

Dated: March 30, 2026

/s/ Sonni Waknin
SONNI WAKNIN
(CA Bar No. 335337)

CERTIFICATE OF COMPLIANCE

I certify that the attached Petition For Writ Of Mandate and/or Other Extraordinary Relief And Request For Expedited Review; Memorandum of Points and Authorities uses a 13-point Time New Roman font and contains 4,439 words.

/s/ Sonni Waknin
SONNI WAKNIN.

DECLARATION OF SERVICE

Case Name: **Clarissa Cervantes, et.al. v. Riverside County Sheriff Chad Bianco, and Riverside County Registrar of Voters Art Tinoco**

No.: S295866

I, Sonni Waknin, declare am 18 years of age or older, and am not a party to this matter. My business address is 3250 Public Affairs Building, Ste. 6226, Los Angeles, CA 90095.

On March 30, 2026, I caused to be served the following document: **REPLY TO RESPONDENT SHERIFF CHAD BIANCO'S PRELIMINARY OPPOSITION - IMMEDIATE RELIEF REQUESTED – STAY OF BALLOT SEIZURE AND HANDLING** via electronic service by transmitting a true copy via this Court's TrueFiling system or via U.S. Mail as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of March, at Los Angeles, California.

/s/Sonni Waknin
Sonni Waknin