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25 Registrar-Recorder/County Clerk

26 *Additional Counsel Listed on Following Page*

27 UNITED STATES DISTRICT COURT
28 CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF CALIFORNIA, SHIRLEY
N. WEBER, in her official capacity as
the California Secretary of State, and
DEAN C. LOGAN, in his official
capacity as the County of Los Angeles
Registrar-Recorder/County Clerk,

Defendants.

Case No. 2:26-cv-12025

**DECLARATION OF AMAN
BHULLAR IN SUPPORT OF
DEFENDANT DEAN C. LOGAN'S
OPPOSITION TO PLAINTIFF'S
REQUEST FOR TEMPORARY
RESTRAINING ORDER**

Date Action Filed: 10/15/2026

1 **PUBLIC RIGHTS PROJECT**

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DECLARATION OF AMAN BHULLAR

I, Aman Bhullar, declare as follows:

Background of Declarant

1. I am the Assistant Registrar-Recorder/County Clerk of the Information Technology Bureau of the County of Los Angeles Registrar-Recorder/County Clerk (hereinafter “Registrar”). In such capacity, I am responsible for the configuration, maintenance, and operation of election management and tally systems and the preparation of ballot materials for all federal, state, county, school district, and special district elections conducted by the Registrar. I have worked at the Registrar for 9 years. I have personal knowledge of the facts set forth in this declaration based on my role at the Registrar. If called as a witness, I could and would testify competently to all facts stated herein.

2. I submit this declaration in support of the Registrar’s Opposition to the U.S. Department of Justice’s (“DOJ”) Request for Temporary Restraining Order in the above-captioned case to provide additional context regarding how the technology behind the Registrar’s election systems works when administering an election.

3. As explained further below, based on my technical expertise, I have grave concerns about the potential catastrophic impact of implementing the DOJ’s request to “set aside vote-by-mail ballots from persons identified by the Federal Government likely to be noncitizens” based on a list of approximately 20,000 individuals (the “October List”), the majority of which are records for individuals located outside of Los Angeles County. The Registrar does not make programmatic changes in the middle of an election cycle and, in fact, has policies against making programmatic changes during election cycles, consistent with federal and state law. The potential consequences of implementing DOJ’s demand are severe and range from halting all counting; halting in-person voters’ ability to cast votes; or otherwise interfering with the ability to accurately count votes. From a technical

1 standpoint, I do not believe it would be possible to implement the changes
2 requested by the DOJ without violating state and federal law regarding election
3 deadlines.

4 **Change Management Process**

5 4. “Setting aside” vote-by-mail ballots pursuant to the DOJ’s request
6 would require changes to the Registrar’s election systems that are governed by
7 what is collectively referred to as the change management process. Under that
8 process, a requested change is first initiated and documented. Programmers then
9 develop the code necessary to implement the change in the system. The change is
10 tested multiple times in a non-production environment to identify any unintended
11 impacts. A non-production environment is a separate computing or software
12 environment used for development, testing, and staging before software is deployed
13 to live users. Other programmers then conduct a peer review to validate that the
14 change is safe. The change is typically implemented during off-peak hours; under
15 ordinary circumstances, changes are made over a weekend when there are no users
16 on the system and no processing is occurring. A large change is also accompanied
17 by a “fail period,” which is a defined window during which a system, service, or
18 application is expected to be unavailable, degraded, or producing errors, and during
19 which that behavior is considered acceptable or anticipated. Rollback procedures
20 are also prepared in the event the change must be reversed.

21 5. These steps reflect industry best practices. They are well understood
22 by IT professionals. They all help protect the system and its users from unintended
23 consequences of software changes.

24 **Freeze Period**

25 6. To protect the stability and security of the County’s election systems,
26 the Registrar requested that the Los Angeles County Internal Services Department
27 (“ISD”) implement a tiered election freeze for the November 3, 2026, General
28 Election, which limits changes to the systems and infrastructure that support the

1 election (“Freeze Policy”). A true and correct copy of the Registrar’s August 21,
 2 2026 memorandum to ISD titled “Election Freeze for the November 3, 2026,
 3 General Election” is attached hereto as **Exhibit A**.¹ The freeze proceeds in three
 4 levels.

5 7. Level One, in effect from September 18, 2026, at 5:00 p.m. through
 6 December 3, 2026, at 5:00 p.m., limits changes to Voice over Internet Protocol
 7 (“VoIP”) at Registrar headquarters, the Ballot Processing Center, the Election
 8 Operations Center, the Voting Solutions for All People (“VSAP”) Operations
 9 Center, the Tally Disaster Recovery environment, and six Registrar branch offices,
 10 as well as to Registrar servers hosted by ISD, wide area and local area network
 11 infrastructure, all Registrar Wi-Fi access points, and facilities infrastructure at all
 12 Registrar facilities.

13 8. Level Two, in effect from October 2, 2026, at 5:00 p.m. through
 14 November 19, 2026, at 5:00 p.m., further restricts changes to both the physical
 15 infrastructure and the virtual environment of all systems used to support the
 16 election, and requires Information Technology Systems (“ITS”) General Manager
 17 approval for any such change.

18 9. Level Three, in effect from October 14, 2026, at 5:00 p.m. through
 19 November 6, 2026, at 5:00 p.m., suspends standard requests for change entirely;
 20 **any** change must be submitted as a normal or emergency request with ITS General
 21 Manager approval, and all other requests are approved only to restore service or
 22 prevent imminent outages. The purpose of the freeze is to reduce risk to the
 23 system’s integrity by ensuring that system maintenance is performed only during
 24 the times that pose the lowest risk to the elections environment.

25 Executing the DOJ’s Demand

26 10. Attempting to execute the DOJ’s demand would require violating the

27
 28 ¹ The Registrar generally creates a freeze policy during elections and this is not unique to the
 current election cycle, but standard practice for all elections.

1 Registrar's Freeze Policy. Changes of this magnitude are considered major changes
 2 and have been restricted as Level Two changes since October 2, 2026. In the
 3 normal course of business, any change that is not meant to restore service or
 4 prevent imminent outages should not be approved.

5 11. The DOJ's request would require system updates to multiple, separate
 6 software programs and hardware devices. Different changes would be required for
 7 in-person voting and vote-by-mail voting, although some would overlap. The
 8 affected software and hardware include, but are not limited to, the Registrar's
 9 Election Management System ("DIMS"), BlueCrest Vantage sorters, and Electronic
 10 Pollbooks ("ePollbooks"). I address each change in turn.

11 **Adjustments to DIMS**

12 12. Before any ballot could be set aside, DIMS, the centralized voter
 13 registration database and election management application, would first have to be
 14 adjusted. DIMS is a software system that manages voting operations and tracks
 15 voter registration information for close to 5.9 million voters in the County. DIMS
 16 supports essential functions such as maintaining voter records and voter
 17 preferences, conducting elections, managing petitions, facilitating vote-by-mail
 18 processes, content management, administrative functionality, and real-time
 19 information exchange between ePollbooks and the statewide voter registration
 20 database ("VoteCal").

21 13. Because DIMS houses all voter registration information, it is the first
 22 step regardless of whether the individual votes by mail or in person. The Registrar
 23 would first be required to place a database flag on these individuals, if they appear
 24 in DIMS. No such flag currently exists, so a new flag would need to be developed
 25 and tested by the DIMS manufacturer, Runbeck Election Services, LLC. The
 26 Registrar would then need to validate and test it in a non-production environment.
 27 The Registrar would also need to work with its third-party vendors for automatic
 28 signature verification, BlueCrest, Inc., and for ePollbooks, KnowInk, to ensure that

1 the proposed adjustment would interact properly with their respective software. In a
2 normal change-management process, designing this sort of change could take some
3 time and would need to include a rollback and fail period. Changes on this scale,
4 even in ideal circumstances, may take far longer than expected because the
5 downstream consequences are unclear. It is not clear how long it would take during
6 an active election cycle.

7 14. Importantly, it is impossible to do this type of programmatic change
8 without shutting down the DIMS system due to the need to update all of the
9 Registrar's desktop computers with the new DIMS software, among other items.
10 During the election cycle, full staff resources are operational through the weekend.

11 15. The ePollbooks have already been configured and prepared for
12 deployment. Preparing them took ten (10) days. Incorporating the proposed
13 programmatic change would require every ePollbook to be updated and tested. That
14 work cannot be completed safely and uniformly before Election Day, and certainly
15 not by the start of the early in-person voting period beginning on October 24, 2026.
16 Further, any change to the ePollbooks must pass the Secretary of State's testing and
17 certification requirements before the ePollbooks may be used. Initiating that process
18 during the election period would trigger new operational procedures with
19 downstream effects on other election functions. Those effects would include a
20 temporary halt to the movement of ballots, including the movement of ballots to
21 tabulation. As a result, the change would impede the administration of the election
22 for all voters. The ePollbooks have already been deployed to, and are in use at, the
23 hybrid vote center that is currently operating.

24 16. Even if the programmatic change could be made safely, the effect of
25 making a change to DIMS in the current environment cannot be determined in
26 advance. The possible consequences are significant and consequential. For
27 example, the change could function as intended for voters on the October List but
28 also flag voters who are not on that list. The system would then segregate the

1 ballots of voters beyond those on the October List. DIMS contains all voter
2 information and is the central software and data source on which the Registrar's
3 other systems rely. A failure in DIMS could therefore jeopardize the Registrar's
4 ability to meet federal and state deadlines. In addition, DIMS cannot be placed in a
5 quiet period (or "turned off") during an election cycle. As a result, the Registrar
6 would be unable to confirm, within the election period, whether the change had
7 been programmed correctly.

8 **Vote by Mail**

9 17. The Registrar would next need to make separate adjustments for vote-
10 by-mail ("VBM") voters and in-person voters. For VBM voters, the Registrar uses
11 the BlueCrest Vantage to physically sort VBM ballots. As ballots pass through the
12 BlueCrest Vantage, two processes occur. First, the BlueCrest Vantage performs
13 automatic signature verification. The signature reference files are stored in DIMS,
14 and the BlueCrest Vantage compares the signature on each ballot envelope with the
15 signature reference file in DIMS. Second, the BlueCrest Vantage sorts ballots into
16 twenty (20) separate sort categories, each of which must be programmed. To route
17 ballots from voters on the October List so that they are not sent to extraction,
18 BlueCrest would need to develop a new sort scheme for the BlueCrest Vantage.
19 That new sort scheme would then need to be tested before it could be used. Because
20 BlueCrest, a third-party vendor, would design the new sort scheme, the Registrar
21 cannot determine whether the change is feasible in the middle of the election cycle
22 and would need to further consult with BlueCrest. The Registrar also cannot
23 determine the downstream consequences of making such a change at this time.

24 **In-Person Voting**

25 18. Separate adjustments would also be required for setting aside ballots
26 for individuals who vote in person and appear on the October List. When a voter
27 appears at a vote center, vote center staff use an ePollbook, which has replaced a
28

1 printed voter registration list. Staff use the ePollbook to verify the voter's
2 registration eligibility in real time and to record whether the voter has already
3 voted. The ePollbook software is developed by a third-party vendor and certified by
4 the California Secretary of State. The Registrar plans to dispatch more than 5,000
5 ePollbooks throughout the County on October 21, 2026, and some have already
6 been deployed at the hybrid vote center in the Registrar's headquarters. Loading the
7 data onto all these devices takes ten (10) days. The ePollbooks are already fully
8 prepared for deployment for the November 3, 2026, General Election.

9 19. Ordinarily, when a registered voter checks in on the ePollbook, the
10 Ballot Marking Device ("BMD") receives no information about the voter other than
11 the voter's ballot style.² The BMD is the device on which the voter marks their
12 ballot. Apart from ballot style, no information about the voter is transmitted to the
13 BMD or associated with the voted ballot. The ballot therefore cannot be connected
14 to the voter who cast it.

15 20. In practical terms, a new process would need to be established for in-
16 person voters on the October List. That process does not currently exist. It would
17 have to be created, and vote center workers would have to be trained on it. Special
18 handling procedures would also have to be established. Under the current process,
19 even if October List voters could be identified in the ePollbook in some way, they
20 would be able to cast only provisional ballots. Vote center workers have no process
21 for treating this new category of voters differently. Vote center workers are given
22 specific scripts and are required to follow them. More than 10,000 vote center
23 workers are engaged in this election. Many of them have already completed their
24 training, which takes place over several weeks. Developing, training, and
25 rehearsing a new process is not possible at this stage.

26 21. The provisional ballots cast by October List voters would be mixed

27 ² Each voter has a ballot style based on his or her address, because different contests apply
28 depending on where the voter lives—for example, different areas have water districts,
congressional districts, and school districts.

1 with other valid provisional ballots cast by other voters. There is currently no
 2 means of segregating the October List voters' ballots from those other provisional
 3 ballots. Separating them would require individuals to review all in-person
 4 provisional ballots and manually compare the names on each ballot envelope to the
 5 October List. The Registrar cannot be confident that such a manual comparison
 6 would be accurate, because of the potential for errors.

7 **Tally**

8 22. Once ballots enter tally operations, including tally pre-processing,
 9 there is no way to separate or identify the ballot of any voter, including voters on
 10 the October List. No association exists between a ballot and the voter who cast it
 11 consistent with California voter anonymity requirements and . The Registrar
 12 therefore cannot locate or remove the ballot of any particular voter. As a result, to
 13 the extent any individuals on the October List have already voted, their ballots
 14 cannot be segregated at this stage.

15 **Conflicts with Law**

16 23. I do not believe it would be possible from a technical perspective to
 17 comply with the DOJ's demand based on my current understanding without
 18 violating state and federal election legal requirements and required deadlines.

19 **October List Analysis**

20 24. At counsel's request, my Team conducted a preliminary analysis of a
 21 sample of two hundred (200) records from the October List. Our analysis included
 22 the following:

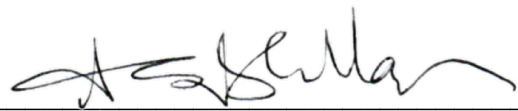
- 23 a. 42.9% of the list sampled had canceled voter registration records
 24 in our system; 42.4% of the list samples had active records, i.e.,
 25 i.e., that the record has cleared verification through the statewide
 26 database and has met all legal requirements for voter
 27 registration.; and 4.6% are considered inactive records, meaning
 28 there is an issue in the record that has been flagged such as the

1 mail being undeliverable, not responding to a confirmation
2 notice, or not voting.

- 3 b. 86 of the sample listed individuals who had ballots mailed to
4 them in the November 2026 General Election; all 112
5 individuals where ballots were not mailed to them had either
6 canceled or inactive records.
7 c. 71.2% of the list sampled had never voted in the past elections.
8 d. Among the records for which birthplace information was
9 meaningfully reported, 38.9% indicated that they were born in
10 the United States.

11 25. Of the more than 20,000 records on the October List, 7,035 have
12 addresses located in Los Angeles County.

13
14 I declare under penalty of perjury under the laws of the United States of
15 America that the foregoing is true and correct. Executed this 20th day of October,
16 2026, at City of Industry, California.

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20 Aman Bhullar
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EXHIBIT A



LOS ANGELES COUNTY REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN
Registrar-Recorder/County Clerk

August 21, 2026

To: Mirian Avalos, General Manager (ITS)
Internal Services Department

From: Jeremy Keller, Department Information Security Officer (DISO)
Registrar-Recorder/County Clerk

ELECTION FREEZE FOR THE NOVEMBER 3, 2026, GENERAL ELECTION

The County of Los Angeles will be conducting the November 3, 2026, General Election. The results of the election are scheduled to be certified on November 27, 2026. In support of the election, the Registrar-Recorder/County Clerk (RR/CC) is requesting that the Internal Services Department (ISD) implement a freeze on many services provided by ISD.

During the specified date range listed below, the following types of changes will be limited:

Election Freeze Level One - Friday, September 18, 2026, at 5:00 p.m. through Thursday, December 3, 2026, at 5:00 p.m.

- VoIP for:
 - RR/CC Headquarters at 12400 Imperial Hwy in Norwalk
 - RR/CC Ballot Processing Center (BPC) at 13401 Crossroads Pkwy N, City of Industry
 - RR/CC Election Operations Center (EOC) at 12680 Corral Place in Santa Fe Springs
 - RR/CC VSAP Operations Center (VOC) at 12100 Rivera Road in Whittier
 - RR/CC Tally Disaster Recovery (DR) environment at 9150 Imperial Highway in Downey and six (6) RR/CC branch offices
- RR/CC servers hosted by ISD and their eCloud/eBlock environment
- Wide Area Network (WAN) and Local Area Network (LAN) infrastructure
- All RR/CC Wi-Fi access points
- Facilities infrastructure at all RR/CC facilities (e.g., electrical generators)

Mirian Avalos, General Manager
August 21, 2026
Page 2

Election Freeze Level Two – Friday, October 2, 2026, at 5:00 p.m. through Thursday, November 19, 2026, at 5:00 p.m.

In addition to changes covered by Level One, changes to both the physical infrastructure and the virtual environment of all systems used to support the election are restricted and require ITS General Manager approval. Changes to the following areas which are countywide or affect RR/CC, ISD, or BOS, are covered by Level Two:

- eCLOUD
- Office365
- eGIS
- VoIP
- LAN/WAN
- Desktop computer infrastructure
- Windows servers
- Email gateway
- Laptop computer infrastructure
- Hosted domain components
- Security Infrastructure
- Election-related AWS Infrastructure

Election Freeze Level Three – Wednesday, October 14, 2026, at 5:00 p.m., through Friday, November 6, 2026, at 5:00 p.m.

In addition to changes covered by Levels One and Two, during the twenty-four-day Level Three window, the following restrictions will be in place:

- Standard RFCs will be suspended, and changes normally made using the standard model must be submitted as a normal change with ITS General Manager approval or an emergency RFC with ITS General Manager approval.
- All other RFCs will only be approved to restore service or prevent imminent outages and will also require ITS General Manager approval.

Moreover, all RR/CC election platform and system owners will be permitted to schedule resources to get important system work done during non-freeze periods. It is important to note that this procedure has been created based on input from the RR/CC executive leadership – for further guidance, please contact the RR/CC DISO. Ultimately, the goal of all parties (e.g., executive leadership, DISO, DCIO, and system owners) is to reduce risk to ballot integrity by performing system maintenance during times that have the lowest risk to the elections environment in the unlikely event that something goes wrong with the update.

Mirian Avalos, General Manager
August 21, 2026
Page 3

The election freeze ensures a stable and secure environment for election activities. We appreciate your cooperation and adherence to this freeze. Please share this memo with all ITS employees and contractors.

Should you have any questions, you may contact me at (562) 462-2445 or email jkeller@rrcc.lacounty.gov.

AB:JK

C: ITS Deputy General Managers
RR/CC ITB Management
Leslie Luke
Office of the CIO

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