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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of Orange  
**12/04/2018** at 11:49:54 AM  
Clerk of the Superior Court  
By Isia Vazquez, Deputy Clerk

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 North Justice Center  
FOR THE COUNTY OF ORANGE, ~~CENTRAL JUSTICE CENTER~~ IV

11 PHIL BACERRA, )  
12 Contestant, )  
13 v. )  
14 ROMAN REYNA; MARIA HUIZAR, Santa Ana )  
15 City Clerk, )  
16 Defendants. )

**Case No.:** 30-2018-01035769-CU-PT-CJC  
Judge Craig Griffin  
**VERIFIED STATEMENT OF  
CONTEST OF ELECTION**  
**ENTITLED TO PRIORITY PURSUANT TO  
ELECTIONS CODE §16500**

17  
18  
19 Contestant Phil Bacerra pleads and alleges as follows:

- 20 1. Contestant Phil Bacerra submits this Statement of Contest of Election pursuant to  
21 Division 16 of the Elections Code, commencing at §16000, by filing this Statement of Election  
22 Contest pursuant to Elections Code §16400.  
23 2. Contestant Phil Bacerra is a registered voter and elector of the County of Orange and the  
24 City of Santa Ana, in Ward 4. He is named herein pursuant to Elections Code §16002.  
25 3. Defendant Roman Reyna was a candidate for the city council of Santa Ana in Ward 4.  
26 He received the most votes. He is named herein pursuant to Elections Code §16002. His election is  
27 contested.  
28

1           4. Contestant Bacerra contests the election of Roman Reyna to the city council of Santa Ana,  
2 Ward 4, on these bases:

3                   a. Pursuant to Elections Code §16100(b), Reyna was not at the time of the election  
4 eligible for the office to which he was elected;

5                   b. Pursuant to Elections Code §16100(c), Reyna committed an offense against the  
6 elective franchise defined in Division 18, commencing with Elections Code §18000, by violating  
7 §18203 by filing or submitting for filing a nomination paper or declaration of candidacy knowing that  
8 it or any part of it has been made falsely.

9           5. The date of the declaration of the result of the election by the body canvassing the returns  
10 there was Friday, November 30, 2018, at 9:00 p.m. in the evening, by the Registrar of Voters.  
11 Contestant is informed and believes that the Orange County Registrar of Voters was retained by the  
12 city of Santa Ana to conduct the election and do the canvassing. Elections Code §10262 prescribes  
13 that the elections official shall certify the results to the governing body. Elections Code §16404  
14 provides for the date of completion of the official canvass of the board of supervisors of the county  
15 last making a declaration.

16           6. Defendant Maria Huizar is the city clerk of the city of Santa Ana, and is responsible for  
17 issuing certificates of election for the city of Santa Ana. She is named herein in her official capacity  
18 as the elections officer of the City of Santa Ana, and the person who issues certificates of election.

19           7.       The address of defendant Roman Reyna on his most recent affidavit of registration is  
20 1522 Hemlock Way, Santa Ana, California, as set forth in Paragraph 17 herein.

21           8.       The City of Santa Ana is a charter city in Orange County. Article XII of the city charter,  
22 commencing at Section 1200, provides for municipal elections. Section 1201 provides that general  
23 municipal elections in Santa Ana shall be held on the first Tuesday after the first Monday in  
24 November of each even-numbered year. Section 1203 provides that all elections shall be held in  
25 accordance with the provisions of the Elections Code of the State of California, as the same now exist  
26 or hereafter may be amended, for the holding of municipal elections so far as the same are not in  
27 conflict with the Charter.  
28

1           9.     Section 400 of the city charter provides that the city council shall consist of seven  
2 members, including a mayor who is elected citywide. Each council office is assigned to each of six  
3 wards in the city. Candidates for each office of councilmember shall be nominated from such ward.

4           10.    Section 401 of the charter provides that in order to be eligible to be elected to the office  
5 of councilmember, "a person must be a qualified voter *and a thirty (30) day resident of the ward from*  
6 *which the candidate is nominated at the time nomination papers are issued as provided for in the*  
7 *Elections Code*". Elections Code section 10227 defines "issued" as the day that the forms required  
8 for nomination and election are furnished to the candidate.

9           11.    Defendant Roman Reyna had served on the Santa Ana City Council as the  
10 representative of Ward 5 from 2012, when he was elected, to 2016, when he was defeated for  
11 reelection.

12          12.    On August 2, 2018, Santa Ana city clerk Maria Huizar issued nominating papers to  
13 Roman Reyna as a candidate for Ward 4, a different ward than the ward he had previously  
14 represented.

15          13.    At the time papers were issued to Reyna to run for Ward 4, Reyna had not been a  
16 resident of Ward 4 for 30 days. He was not eligible to be a candidate in Ward 4.

17          14.    Reyna previously had been registered to vote at an address in Ward 5. On or about  
18 June 27, 2018, Reyna registered to vote at 2519 W. Harvard, Santa Ana. A copy of the voter  
19 registration is attached as Exhibit A. This address is in Ward 6. On or about June 21, 2018, Reyna  
20 filled out an application to serve on the Santa Ana Planning Commission, and showed his address to  
21 be 2519 W. Harvard, Santa Ana.

22          15.    Reyna requested and was issued nomination papers from the Santa Ana City Clerk on  
23 Thursday, August 2, 2018 to be a candidate for Ward 4. Thirty days prior to August 2, he was  
24 registered to vote at the Harvard address in Ward 6. On August 3, Reyna filed a form 410, Statement  
25 of Organization Recipient Committee, that showed his committee address to be the Harvard Street  
26 address. A copy is attached as Exhibit B. He also at that time filed a form 501, Candidate Intention  
27 Statement, that showed his address to be the Harvard Street address. A copy is attached as Exhibit C.

28          16.    Voter registrations are made under penalty of perjury (Elections Code section 2102(c)).

1 17. Reyna did not re-register to vote in Ward 4 until July 16, 2018, when he registered to vote  
2 at 1522 Hemlock Way, Santa Ana. That address is in Ward 4.

3 18. However, on August 2, 2018, when he requested nominating papers, Reyna filled out a  
4 city form for Candidate Information for 2018 Municipal Election, a form not under penalty of  
5 perjury, in which Reyna listed an address of 1218 W. Bishop. Reyna has never been registered at that  
6 address. On August 2, 2018, Reyna presented to the city clerk a "rental agreement" which stated that  
7 Reyna "is renting a room" at 1218 W. Bishop. The agreement does not state that Reyna is residing at  
8 the address. The agreement is purportedly dated June 28, 2018. A copy of the document is attached as  
9 Exhibit D.

10 19. Because of the August 2 issuance date, Reyna would have had to have been a resident of  
11 Ward 4 by July 3, 2018. Based on the voter registration documents, the form 410, the form 501, and  
12 Reyna's prior office in another ward, Reyna's Planning Commission application, and such other  
13 evidence as may be presented, Reyna was not a resident of Ward 4 thirty days or more prior to the  
14 issuance of nomination papers.

15 20. Prior to requesting nomination papers on August 2, 2018, Reyna had an exchange of text  
16 messages with the city clerk, Maria Huizar. These text messages were produced in response to a  
17 request under the Public Records Act. There are 14 pages of text messages in the fashion produced by  
18 city clerk Huizar. They are attached as Exhibit E. The significant excerpts are as follows (starting at  
19 page 3):

20 **"Fri, July 6 4:27 p.m. Huizar: "Would like to clarify that you are registered to vote in**  
21 **Ward 6, correct?"**

22 **Reyna: "6, no"**

23 **Huizar: "Yes, your address on the application is in Ward 6. I thought you had**  
24 **mentioned you would be moving to Ward 4. Just wanted to make sure you were aware."**

25 **Reyna: "Hello. 2519 W. Harvard 92704**

26 **What**

27 **Can u send me Ward 4 boundary**

28 **Yikes"**

1 Huizar: "I don't have them on PDF. The ward map is posted on the web though. You can  
2 zoom in to see boundaries."

3 Reyna: "Ok thx"

4 City council Ward Map, City of Santa Ana [santa-ana.org](http://santa-ana.org)

5 Huizar: "Boundary map of the city"

6 Reyna: "Thx"

7 Question. What forms of documents Do you Asfour as proof of residency at that  
8 location? A bill in your name, register to vote at that address,???"

9 Huizar: "Voter registration, lease, utility bill. . . any would do.

10 Voter registration for sure needs to be in Ward running."

11 Reyna: "Ok thx"

12 Will do.

13 When can ppl pull papers"

14 Huizar: "Monday, July 16 thru August 10<sup>th</sup>. Just make sure paperwork in order otherwise I  
15 can't issue Nomination Papers."

16 Reyna: "Ok thx"

17  
18 July 10, 2:26 p.m.

19 Reyna: "1522 hemlock way 92704..."

20 Huh? No election

21 When do they normally

22 June?

23 Huizar: Yes. Normally.

24 Reyna: When's the latest that they can call for the election

25 Huizar: That's a Sonia question, but I think it may be August 10<sup>th</sup>. I don't know for sure  
26 though. It's never happened before.

27 Reyna: Is there a lawsuit pending in regards to elections, awards, boundaries,"

28 Huizar: "Yes."

1 Reyna: "Then how do u know how long they have been there?"

2 Just asking lol"

3 Huizar: "That is why I need proof of residency. Your planning Commission is dated June 21,  
4 but it has a different address. You signed that under penalty of perjury so now I need proof that you  
5 are residing elsewhere for at least 30 days. Proof of residency may include copy of lease, utility bill  
6 etc that is dated longer than 30 days from time I issue papers."

7  
8 **July 24, 11:21 a.m.**

9 **Reyna: "Ok. I aunt will sign our rent agreement..**

10 **It's just a few lines.**

11 Call I pull tomorrow 4:30ish"

12 Huizar: "Sure. It can be as long or short as you'd like. Just need address, date you started  
13 residing there, her signature. Let me know if you have any other questions ;)"

14 Reyna: "Koo thx"

15 Huizar: "Anytime. See you later today."

16 Reyna: "Tomorrow.

17 I go to Catalina at the end of the week and I have monthly reports I need to finish.  
18 Work is kicking my ass right now."

19 Huizar: "Oh that's right. Yes tomorrow. I kept thinking you were leaving to Catalina today."

20 Reyna: "I wish.

21 Thx".

22  
23 21. In the election held of November 6, 2018, according to the tally announced by the  
24 Registrar of Voters on November 30, 2018, Reyna received 29,863 votes and Phil Bacerra received  
25 23,613 votes. There were no other candidates for Ward 4.

26 22. Elections Code §16500 provides that within five days after the end of the time allowed for  
27 filing statements of contest, the clerk of the superior court shall notify the superior court of the county  
28 of all statements filed. The presiding judge shall forthwith designate the time and place of hearing,

1 which time shall be not less than 10 nor more than 20 days from the date of the order.

2 23. The court has the sole jurisdiction to determine this election contest. Government Code  
3 §36812 provides: "After incorporation, the city council is judge of the qualifications of its members  
4 and of election returns. It shall determine contested elections of city officers." However,  
5 Government Code § 36812.1 provides. "Election contests; period of suspension of proceedings  
6 If a written statement to contest the election of a city officer pursuant to Sections 16400 and 16401  
7 of the Elections Code is filed with the city clerk prior to the commencement of any proceeding by the  
8 city council, pursuant to Section 36812, the authority of the city council to commence those  
9 proceedings shall be suspended for the applicable period of time specified in Section 16401 of the  
10 Elections Code for the filing of the statement of contest. [¶] Upon the expiration of the period of time,  
11 the city council may proceed pursuant to Section 36812 if no proceedings have been instituted  
12 pursuant to Article 1 (commencing with Section 16500) of Chapter 6 of Division 16 of the Elections  
13 Code, or those proceedings are terminated without judgment being rendered by the court."

14 24. Contestant has filed with the city clerk this contest.

15  
16 WHEREFORE contestant prays as follows:

17 1. That the court make a determination that Reyna was not eligible to run for the office  
18 of Ward 4, and is disqualified;

19 2. That the court make a determination that Reyna Reyna committed an offense against  
20 the elective franchise defined in Division 18, commencing with Elections Code §18000, by violating  
21 §18203 by filing or submitting for filing a nomination paper or declaration of candidacy knowing that  
22 it or any part of it has been made falsely;

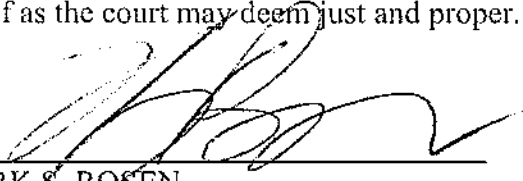
23 3. That the court annul and set aside the election certificate delivered to Roman Reyna,  
24 and declare contestant Phil Bacerra to be elected and entitled to a certificate of election, and order the  
25 elections official to immediately make out and deliver to him a certificate of election, pursuant to  
26 Elections Code §16700, or otherwise act in accordance with the annulment of the election of Roman  
27 Reyna;

28

1           4.     For costs of suit;

2           5.     Such other and further relief as the court may deem just and proper.

3  
4     DATED: December 4, 2018

  
\_\_\_\_\_  
5     MARK S. ROSEN  
6     Attorney for Contestant Phil Bacerra

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# EXHIBIT A

# CALIFORNIA VOTER REGISTRATION FORM/FORMULARIO DE INSCRIPCIÓN DEL VOTANTE DE CALIFORNIA

## ORANGE COUNTY

Fill out this form if you are a new voter, have moved or changed your name, or want to change your political party preference. You must be a U.S. citizen and at least 18 years old by the next election to use this form. Use blue or black ink. Print clearly. -- *Llene este formulario si es nuevo votante, se mudó o cambió de nombre o si desea cambiar su preferencia de partido político. Para usar este formulario, tiene que ser ciudadano de EE UU y tener al menos 18 años de edad en la próxima elección. Use tinta azul o negra. Escriba en letra de molde y de manera clara.*

Your legal name: First name - *Nombre legal: Primer nombre*

Middle name - *Segundo nombre*

① Roman Anthony

Last name - *Apellido*

Optional - *Opcional*

Mr. - Sr.  Mrs. - Sra.  
 Ms. - Sra.  Miss - Srta.

Apt or unit # *Nº de Departamento o unidad*

② REYNA

Home address - not a P.O. Box or business address - (Number, Street, Ave., Drive, etc. Include N, S, E, W)  
*Domicilio - no apartado postal ni dirección de trabajo - (Número, calle, avenida, camino, etc. incluir N, S, E, W)*

④ 2519 Harvard

⑤ Santa Ana CA 92709 Orange

If you do not have a street address, describe where you live (Cross streets, Route, N, S, E, W)  
*Si no tiene dirección con calle, describa dónde vive (entre qué calles, ruta, N, S, E, W)*

Mailing address - If different from above, or P.O. Box - *Domicilio postal - si es distinto del que figura arriba o apartado postal*

City - *Ciudad* State - *Estado* Zip - *Código postal* Foreign country - *País extranjero*

Date of birth - *Fecha de nacimiento* U.S. state or foreign country of birth - *Estado de EE UU o país extranjero en que nació*

⑨ 07 10 1969 ⑩ CALIFORNIA

CA driver license or CA ID card # - *Nº de licencia de manejar de California o tarjeta de identificación de California*

If you do not have a CA driver license or ID card, list the last 4 numbers of your Social Security Number, if you have one. - *Si no tiene licencia de manejar de California o tarjeta de identificación de California, escriba las últimas 4 cifras de su número de Seguro Social (SSN), si tiene uno.*

SSN (Last 4 numbers) *SSN (las últimas 4 cifras)*

Phone numbers are posted at polling places on election day. Los números de teléfono se publican en las mesas electorales el día de la elección.

email (optional) - *electrónico (opcional)*

Phone number (optional) - *Número de teléfono (opcional)*

⑫ ROMAN-AL reynia@hotmail.com

⑭ Do you want to disclose a political party preference? - *¿Desea revelar preferencia de partido político?*

Yes, my political party preference is (check one): - *Si, mi preferencia de partido político es (marque uno):*

American Independent Party  Americans Elect Party  Democratic Party  Green Party  
*Partido Americano Independiente Partido Americanos Eligen Partido Demócrata Partido Verde*  
 Libertarian Party  Peace and Freedom Party  Republican Party  Other (specify):  
*Partido Libertario Partido Paz y Libertad Partido Republicano Otro (especificar):*

No, I do not want to disclose a political party preference. (If you check this box, you may not be able to vote for some parties' candidates at a primary election for U.S. President or party committees.) - *No, no deseo revelar preferencia de partido político. (Si selecciona esta casilla, es posible que no pueda votar por los candidatos de algunos partidos en las elecciones primarias para Presidente de EE UU ni el comité partidista.)*

⑮ To receive a vote-by-mail ballot in all elections, initial here: SR - *Para recibir una balota de votación por correo en todas las elecciones, ponga sus iniciales aquí.*

⑯ If you were registered to vote before, fill out below: - *Si se inscribió para votar antes, llene a continuación:*

First name - *Primer nombre* Middle initial *Inicial del segundo nombre* Last name - *Apellido*

Roman A Reyna

Previous address where you were registered - *Dirección en la que estaba inscrito anteriormente* City - *Ciudad*

2205 W 7th Street Santa Ana

State *Estado* Zip *Código postal* Previous county *Condado anterior* Previous political party preference (if any) *Preferencia de partido político anterior (si correspondía)*

CA 92703 Orange

⑰ Are you a U.S. citizen? *¿Es usted ciudadano de EE UU?*  Yes-Sí  No

A "No" answer to either question means you CANNOT register to vote. *Si responde "No" a cualquiera de estas preguntas, NO PUEDE inscribirse para votar.*

Will you be 18 or older by the next election? *¿Tendrá 18 años de edad o más en la próxima elección?*  Yes-Sí  No

⑱ Read and sign below. - *Lea y firme a continuación.*

I am a U.S. citizen and will be at least 18 years old on election day. I am not in prison, on parole, serving a state prison sentence in county jail, serving a sentence for a felony pursuant to subdivision (h) of Penal Code section 1170, or on post release community supervision. I understand that it is a crime to intentionally provide incorrect information on this form. I declare under penalty of perjury under the laws of the State of California that the information on this form is true and correct. Soy ciudadano de EE UU y tendrá al menos 18 años de edad el día de la elección. No estoy en prisión, libertad condicional, cumpliendo una sentencia de prisión estatal en una cárcel de condado, cumpliendo una sentencia por haber cometido un delito mayor conforme a la subdivisión (h) de la sección 1170 del Código Penal, o en supervisión comunitaria después de haber sido puesto en libertad. Entiendo que brindar información incorrecta de manera intencional en este formulario es un delito. Declaro bajo pena de perjurio según las leyes del Estado de California que la información de este formulario es verdadera y correcta.

Optional - *Opcional*

A.  Check here if you can be a poll worker. *Marque aquí si puede trabajar como trabajador electoral.*

If bilingual, indicate language: *Si es bilingüe indique el idioma:*

Check here if you can provide a polling place on election day. *Marque aquí si puede brindar una mesa electoral el día de la elección.*

B. Your ethnicity/race: - *Su etnia/raza:*

C. Check your language preference:  English  Spanish *Marque su preferencia de idioma: Español*

Chinese  Vietnamese  Korean  Tagalog  Japanese  
*中文 越南语 한국어 日本語*

Hindi  Khmer  Thai  
*हिंदी ភ្នំ ไทย*

Did someone help you fill out or deliver this form? - *¿Alguien lo ayudó a llenar o a entregar este formulario?*

If yes, the person who helped you must fill out and sign both parts of this green box. - *Si "sí", la persona que lo ayudó debe llenar y firmar ambas partes de esta casilla verde.*

Signature - *Firma* Month - *Mes* Day - *Día* Year - *Año*

Name, address, and tel. - *Nombre, dirección y número de teléfono:*

Voter Signature - *Firma del Votante* Date Signed - *Fecha de la firma:* Month - *Mes* Day - *Día* Year - *Año*

3050 702007 170002

# EXHIBIT B

Statement of Organization  
Recipient Committee

Statement Type  Initial

Not yet qualified

or

Date qualified as committee

Amendment

Termination - See Part 5

Date qualified as committee \_\_\_\_\_

Date of termination \_\_\_\_\_

Committee Information

I.D. Number  
(if applicable)

1263056

NAME OF COMMITTEE

Treasurers and Other Principal Officers

NAME OF TREASURER

Roman A. Reyna for City Council 2018

Sandra Perez

STREET ADDRESS (NO P.O. BOX)

1118 W. Orange Road

STREET ADDRESS (NO P.O. BOX)

2519 W. Harvard

CITY

Santa Ana

STATE

CA

ZIP CODE

92704

CITY

Santa Ana

STATE

CA

ZIP CODE

92706

AREA CODE/PHONE

714-336-9771

MAILING ADDRESS (IF DIFFERENT)

1118 W. Orange Road, Santa Ana CA 92706

E-MAIL ADDRESS (REQUIRED) / FAX (OPTIONAL)

sperez1021@yahoo.com

COUNTY OF DOMICILE

Orange

JURISDICTION WHERE COMMITTEE IS ACTIVE

Orange

NAME OF PRINCIPAL OFFICER(S)

STREET ADDRESS (NO P.O. BOX)

CITY

STATE

ZIP CODE

AREA CODE/PHONE

Attach additional information on appropriately labeled continuation sheets.

Verification

I have used all reasonable diligence in preparing this statement and to the best of my knowledge the information contained herein is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 6-27-10 By \_\_\_\_\_

DATE

Executed on 6-21-10 By \_\_\_\_\_

DATE

Executed on \_\_\_\_\_ By \_\_\_\_\_

DATE

Executed on \_\_\_\_\_ By \_\_\_\_\_

DATE

SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROponent

SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROponent

SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROponent

SIGNATURE OF CONTROLLING OFFICER/HOLDER, CANDIDATE, OR STATE MEASURE PROponent

CALIFORNIA 410  
FORM

For Official Use Only

Date Stamp

2010 AUG -3 PM 2:25

CITY OF SANTA ANA  
CLERK OF COUNCIL

Statement of Organization  
Recipient Committee

INSTRUCTIONS ON REVERSE

CALIFORNIA  
FORM  
410

Page 2

I.D. NUMBER

COMMITTEE NAME

Roman A. Reyna for City Council 2018

- All committees must list the financial institution where the campaign bank account is located.

NAME OF FINANCIAL INSTITUTION Wells Fargo	AREA CODE/PHONE 714-973-3636	BANK ACCOUNT NUMBER [REDACTED]
ADDRESS 2700 N. Main St., Suite 100	CITY Santa Ana	STATE CA
		ZIP CODE 92705

**Controlled Committee**

- List the name of each controlling officeholder, candidate, or state measure proponent. If candidate or officeholder controlled, also list the elective office sought or held, and district number, if any, and the year of the election.
- List the political party with which each officeholder or candidate is affiliated or check "nonpartisan." Stating "No party preference" is acceptable.
- If this committee acts jointly with another controlled committee, list the name and identification number of the other controlled committee.

NAME OF CANDIDATE/OFFICEHOLDER/STATE MEASURE PROponent	ELECTIVE OFFICE SOUGHT OR HELD (INCLUDE DISTRICT NUMBER IF APPLICABLE)	YEAR OF ELECTION	PARTY	CHECK ONE	
				Nonpartisan	Partisan (list political party below)
Roman A. Reyna	City Councilmember	2018		<input checked="" type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>

**Primarily Formed Committee**

Primarily formed to support or oppose specific candidates or measures in a single election. List below:

CANDIDATE(S) NAME OR MEASURE(S) FULL TITLE (INCLUDE BALLOT NO. OR LETTER)  
IF A RECALL, STATE "RECALL" IN FRONT OF THE OFFICEHOLDER'S NAME.

CANDIDATE(S) OFFICE SOUGHT OR HELD OR MEASURE(S) JURISDICTION  
(INCLUDE DISTRICT NO., CITY OR COUNTY, AS APPLICABLE)

	CHECK ONE	
	SUPPORT	OPPOSE
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

# EXHIBIT C

Candidate Intention Statement

CALIFORNIA 501 FORM

For Official Use Only

Date Stamp

2018 AUG -3 PM 2:25

CITY OF SANTA ANA  
CLERK OF COURTS

Check One:  Initial  Amendment (Explain) \_\_\_\_\_

1. Candidate Information:

NAME OF CANDIDATE (Last, First, Middle Initial)

Reyna, Roman A

DAYTIME TELEPHONE NUMBER

( 714 ) 3369771

FAX NUMBER (optional)

( )

E-MAIL (optional)

sperez1021@yahoo.com

STREET ADDRESS

2519 W. Harvard

CITY

Santa Ana

STATE

CA

ZIP CODE

92704

AGENCY NAME

City of Santa Ana

DISTRICT NUMBER, if applicable.  NON-PARTISAN

PARTY:

OFFICE JURISDICTION

State (Complete Part 2.)

City  County  Multi-County: \_\_\_\_\_

(Name of Multi-County Jurisdiction)

2018

(Year of Election)

2. State Candidate Expenditure Limit Statement:

(CALIFERS and CALISTRS candidates, Judges, judicial candidates, and candidates for local offices do not complete Part 2.)

                     Primary/general election

                     Special/runoff election

(Check one box)

I accept the voluntary expenditure ceiling for the election stated above.

I do not accept the voluntary expenditure ceiling for the election stated above.

Amendment:

I did not exceed the expenditure ceiling in the primary or special election held on: \_\_\_\_\_ and I accept the voluntary expenditure ceiling for

the general or special run-off election.

(Mark if applicable)

On \_\_\_\_\_ I contributed personal funds in excess of the expenditure ceiling for the election stated above.

3. Verification:

I certify under penalty of perjury under the laws of the State

Executed on 6-21-18 (month, day, year)

Signature \_\_\_\_\_

# EXHIBIT D



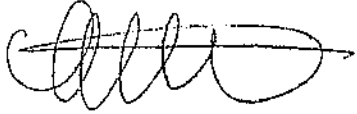
To who it may concern.

This is a rental agreement with roman Reyna. He is renting a room and agrees to pay

On a monthly basis for a total of \$600 for 12 months. Starting June 28.

Our address is 1218 w Bishop, Santa Ana, 92703

Thank you.



Melissa Romero

6/28/18



Roman Reyna

6-28-18

2018 AUG -2 PM 2:12  
CITY OF SANTA ANA  
CLERK OF COUNCIL

# EXHIBIT E



Roman

Tue, Jul 3, 7:44 PM

Hey girl  
Two questions

1. What was the vote ?

2. Didn't know ur middle name is D

What's it for ?

Tue, Jul 3, 9:28 PM

6-0.  
Yes, means "de Los Angeles"

Haha

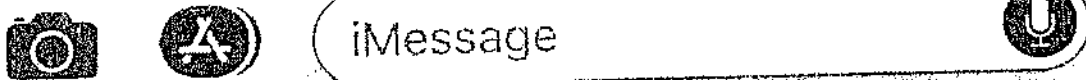
When's the next meeting?

They just cancelled the 7/9 meeting. The only after that is 7/23

Ok

Send me the info when u can

Have a great 4th





Roman



Send me the info when u can

Have a great 4th

I'll have Planning send you orientation packet ;)  
Be safe and congratulations again ;)

Great thx ...

Can u send me a copy of the agenda for the last two Meeting.. just the agenda 😊

Planning commission? I don't have them but will ask pBA to forward.

Yes. Need to do a little homework

Won't be until Thursday. They are posted on line if you just want to download.

Oh ok



iMessage






Roman



Link is

City Council Meetings, City of Santa Ana  
[santa-ana.org](http://santa-ana.org)



Fri, Jul 6, 4:27 PM

Would like to clarify that you are registered to vote in Ward 6, correct?

6, no

Yes, your address on the application is in Ward 6. I thought you had mentioned you would be moving to Ward 4. Just wanted to make sure you were aware.

Hello.  
2519 W. Harvard 92704

What

Can u send me Ward 4 boundary

Camera App Store iMessage App Store

App Store Safari App Store Music App Store App Store App Store



Roman



Can u send me Ward 4 boundary

Yikes

I don't have them on PDF. The ward map is posted on the web though. You can zoom in to see boundaries.

Ok thx



Boundary map of the city

Thx

Question. What forms of documents do you need as proof of residency at that location? A bill in your name, register to vote at that address, ???

Voter registration, lease, utility bill... any would do.



iMessage





Roman

Voter registration, lease, utility bill...  
any would do.

Voter registration for sure needs to  
be in Ward running.

Ok thx  
Will do

When can ppl pull papers

Monday, July 16 thru August 10th.  
Just make sure paperwork in order  
otherwise I can't issue Nomination  
Papers.

Ok thx











Tue, Jul 10, 2:26 PM

1522 hemlock way  
92704...

Huh ? No election

When do they normally

iMessage



Roman

When do they normally

June ?

Yes. Normally.

When's the latest that they can call for the election

That's a Sonia question, but i think it may be August 10th. I don't know for sure though. It's never happened before

Is there a lawsuit pending in regards to elections, awards, boundaries,

Yes.

Thu, Jul 19, 3:35 PM

Hey

Did the council vote to put the election this nov on the ballot

Yes



iMessage







Roman



Did the council vote to put the election this nov on the ballot.

Yes.

Thx

Anytime ;)

Mon, Jul 23, 8:42 AM

Hey can I go in an pull

Sure. I have Nelson's coming in at 9 am. Want to come in at 10 am?

Mon, Jul 23, 10:03 AM

10:30?

How long will it take ?

Can I come in

Of course. Give me 30-45 minutes.

Time to review all the forms, if you'd








Roman

Of course. Give me 30-45 minutes.

Time to review all the forms, if you'd like but if you just to pick up packet that's fine too. Make sure to bring proof of residency.

Residency for 30 days from today, minimum.

The voter reg is not confirmed?

I don't have date of that,, since you changed in last couple of weeks, I need additional proof of your 30 day residency.

Mon, Jul 23, 4:30 PM

Question for u

Does the voter reg tell u what date ?  
From that address

Have u seen my new one?

Just asking



iMessage





Roman



No. System only gives me address and whether you have active or inactive account. It now shows a Hemlock address.

But no date ?

No date.

Then how do u know how long they have been there ?

Just asking lol

That is why I need proof of residency. Your planning Commission is dated June 21, but it has a different address. You signed that under penalty of perjury so now I need proof that you are residing elsewhere for at least 30 days. Proof of residency may include copy of lease, utility bill etc that is dated longer than 30 days from time I issue papers.



iMessage





Roman

Tue, Jul 24, 11:21 AM

Ok. I aunt will sign our rent agreement.  
It's just a few lines.  
Can I pull tomorrow 4:30ish

Sure. It can be as long or short as you'd like. Just need address, date you started residing there, her signature. Let me know if you have any other questions ;)

Koo thx

Anytime. See you later today.

Tomorrow

I go to Catalina at the end of the week and I have monthly reports I need to finish. Work is kicking my ass right now.

Oh that's right. Yes tomorrow. I kept thinking you were leaving to



iMessage





Roman

Oh that's right. Yes tomorrow. I kept thinking you were leaving to Catalina today.

I wish  
Thx

Wed, Aug 1, 3:44 PM

Can I come in tomorrow after 12?

I was going to State of the City from 11:30 to 1 pm. Do you want Norma to issue you the papers if I'm not here?

Can we say 2pm ?

I meant anytime after 12

Yeah that's fine

2 if possible

Let me know

Sure 2 pm is fine. I'll be here ;)



iMessage





Roman

Sure 2 pm is fine I'll be here ;)

Ok

See you thrw.

Ok

Thu, Aug 2, 1:19 PM

Hey

Hey you

Can I go now

I'm finishing up at Bower's but Norma can start you up.

Ok

I'm here

Mon, Aug 6, 12:32 PM

Is there a website people can check



iMessage





Roman



Mon, Aug 6, 12:32 PM

Is there a website people can check to see if their current? In their voter registration

Not that I'm aware. They have rosters that you can purchase but not aware of free or websites to do this.

Ok

Mon, Aug 6, 8:54 PM

What is the ballot statement word count? I can't find it

Mon, Aug 6, 9:56 PM

200 words.

Yikes

Ok

Call me tomorrow at the office.

Need to talk to you about your voter



iMessage





Roman



Call me tomorrow at the office.  
Need to talk to you about your voter registration/residence.

Ok

What's up

Will do

Tue, Aug 7, 2:53 PM

Reminder, your 700 Form for planning Commission was due 8/3. Please file ASAP to avoid late penalties.

Do u have an old copy of mine? All my stuff is on pia's computer

I'm poor  
I have nothing to report

Wait, all my moms kids r on her deed for the house

Friday 1:28 PM



iMessage



14



VERIFICATION

STATE OF CALIFORNIA, COUNTY OF ORANGE

I have read the foregoing Statement of Election Contest and know its contents.

CHECK APPLICABLE PARAGRAPHS

X I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for

a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on December 4, 2018, at Santa Ana, California.

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

Phil Bacerra

Type or Print Name

[Handwritten Signature]

Signature

PROOF OF SERVICE

1013a (3) CCP Revised 5/1/88

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of, State of California.

I am over the age of 18 and not a party to the within action; my business address is:

On, I served the foregoing document described as

on in this action

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:

by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

I deposited such envelope in the mail at, California.

The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on, at, California.

\*\*(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on, at, California.

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

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

\*(BY MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG)

\*\*\*(FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

Legal Solutions Co Plus

Rev. 7/99