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ALAMEDA COUNTY
February 04, 2021
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THE SUPERIOR COURT
By Joanne Downie, Deputy
CASE NUMBER:
RG21087783

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YES IN MY BACK YARD, YIMBY ACTION, SONJA TRAUSS, ROBERT KATTOUW, ELIZABETH CONLAN, ZACCARIAH BOWLING, and STEVEN BUSS

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SUPERIOR COURT – STATE OF CALIFORNIA

COUNTY OF ALAMEDA – UNLIMITED CIVIL JURISDICTION

YES IN MY BACK YARD, a California nonprofit corporation; YIMBY ACTION, a California nonprofit corporation; SONJA TRAUSS, an individual; ROBERT KATTOUW, an individual; ELIZABETH CONLAN, an individual; ZACCARIAH BOWLING, an individual; STEVEN BUSS, an individual,

Petitioners and Plaintiffs,

vs.

CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT; and DOES 1-25,

Respondents and Defendants,

Case Number:

PETITION FOR WRIT OF MANDATE (CCP § 1085); COMPLAINT FOR DECLARATORY RELIEF (CCP § 1060)

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Petitioners and plaintiffs YES IN MY BACK YARD, YIMBY ACTION, SONJA TRAUSS, ROBERT KATTOUW, ELIZABETH CONLAN, ZACCARIAH BOWLING, and STEVEN BUSS (collectively, "Petitioners") by and through their attorneys, Zacks, Freedman & Patterson, PC, file this petition for writ of mandate and complaint for declaratory relief against respondents and defendants CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, and DOES 1-25 (collectively, "Respondents"), to compel Respondents to comply with their duties with respect to the Regional Housing Needs Determination for the San Francisco Bay Area pursuant to Gov. Code section 65580, et seq as is further set forth below. Specifically, Respondents failed to make written findings on, or consider, any imbalance between jobs and housing when determining housing needs for the San Francisco Bay Area. **Petitioners do not seek any stay of the Regional Housing Needs Determination, but rather a supplement to that Determination**.

Petitioners allege as follows:

PARTIES TO THE ACTION

1. Petitioner and Plaintiff YIMBY Action is a § 501(c)(4) nonprofit corporation. YIMBY Action is a network of pro-housing activists fighting for more inclusive housing policies. YIMBY Action's mission is to drive policy change to increase the supply of housing at all levels and bring down the cost of living in opportunity-rich cities and towns through the State of California, including for those members of YIMBY Action in the Bay Area, who have long commutes due to the Bay Area's housing shortage. YIMBY Action has a direct and substantial interest in ensuring that Respondents' decisions are in conformity with the requirements of law, that those requirements are properly executed, and that Respondents' duties are enforced.

2. Petitioner and Plaintiff Yes in My Back Yard ("YIMBY") is a § 501(c)(3) nonprofit corporation and an affiliated entity of YIMBY Action. YIMBY's mission is to increase the accessibility and affordability of housing in California by enforcing state housing laws, and by advocating for increased access to housing for households of all income levels, throughout the State of California, including for those members of YIMBY/YIMBY Action in the Bay Area. YIMBY has a direct and substantial interest in ensuring that Respondents' decisions are in

conformity with the requirements of law, that those requirements are properly executed, and that Respondents' duties are enforced.

3. Petitioner and Plaintiff Sonja Trauss ("Trauss") is a natural person and a resident of the San Francisco Bay Area in the State of California, and founder and director of YIMBY. Trauss, as a member of the public, has a substantial interest in ensuring that Respondents' decisions are in conformity with the requirements of law, that those requirements are properly executed, and that the public duties of Respondents are enforced.

4. Petitioner and Plaintiff Robert Kattouw ("Kattouw") is a natural person and a resident of the San Francisco Bay Area in the State of California, and a member of YIMBY Action. Kattouw, as a member of YIMBY Action and the public, has a substantial interest in ensuring that Respondents' decisions are in conformity with the requirements of law, that those requirements are properly executed, and that the public duties of Respondents are enforced.

5. Petitioner and Plaintiff Elizabeth Conlan ("Conlan") is a natural person and a resident of the San Francisco Bay Area in the State of California, and a member of YIMBY Action. Conlan, as a member of YIMBY Action and the public, has a substantial interest in ensuring that Respondents' decisions are in conformity with the requirements of law, that those requirements are properly executed, and that the public duties of Respondents are enforced.

6. Petitioner and Plaintiff Zaccariah Bowling ("Bowling") is a natural person and a resident of the San Francisco Bay Area in the State of California, and a member of YIMBY Action. Bowling, as a member of YIMBY Action and the public, has a substantial interest in ensuring that Respondents' decisions are in conformity with the requirements of law, that those requirements are properly executed, and that the public duties of Respondents are enforced.

7. Petitioner and Plaintiff Steven Buss ("Buss") is a natural person and a resident of the San Francisco Bay Area in the State of California, and a member of YIMBY Action. Buss, as a member of YIMBY Action and the public, has a substantial interest in ensuring that Respondents' decisions are in conformity with the requirements of law, that those requirements are properly executed, and that the public duties of Respondents are enforced.

8. Respondent and Defendant California Department of Housing and Community

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Development ("HCD" or "Respondent") is a California state agency that, among other things, develops housing policy and administers economic and community development programs.

9. Petitioners are not aware of the identities of respondent/defendants DOES 1-25, who are responsible for the acts and omissions alleged herein and that caused damage to Petitioners; therefore Petitioners will amend this Petition and Complaint when the true identities of DOES 1-25 are ascertained.

10. Petitioners are informed and believe that at all times mentioned in this Petition and Complaint, all respondent/defendants were the agents or employees of their co-respondent/defendant, and in doing the things alleged in this Complaint, were acting within the course and scope of that agency and employment.

JURISDICTION AND VENUE

11. Alameda County Superior Court has initial jurisdiction of the matters alleged herein pursuant to Code of Civil Procedure §§ 1085 and 1060, which authorizes Petitioners to seek a writ of mandate and declaration of rights, and which authorizes the Court to review public agency decisions involving a prejudicial abuse of discretion and/or to compel Respondents' performance of their ministerial and/or legal duties.

12. Venue is proper in this Court because the entire controversy arose here. (Code Civ. Proc. §§ 393(b).)

13. Petitioners performed any and all conditions precedent to filing this action and to the extent they were required to, have exhausted any and all available administrative remedies to the extent required by law.

STATEMENT OF FACTS

14. California state law requires HCD to determine the existing and projected need for housing in each region of California. This state mandate is embodied in Gov. Code section 65580, et seq. ("RHND Statute"). In determining housing needs, the RHND Statute requires HCD to work in consultation with regional councils of governments, such as ABAG. Every eight year cycle, it is HCD's responsibility to determine the total number of new homes the Bay Area needs to build, and how affordable those homes need to be, in order to meet the housing

needs of people at all income levels. When HCD makes this determination, it issues a Regional Housing Need Determination ("RHND") to ABAG.

15. The legislative purposes of the RHND Statute are to assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal, and to encourage, promote, and facilitate the development of housing to accommodate interregional and intraregional housing needs. Once RHNDs are assigned by HCD, regional councils of governments allocate the total units amongst cities and counties. Cities and counties are thereafter required to plan and zone sites within an 8-year planning period at minimum densities sufficient to accommodate the jurisdiction's allocation within that planning period. The RHND process is the only mechanism in state law that requires cities and counties to plan and zone land for housing on a regular basis, so that housing production accountability statutes, such as the Housing Accountability Act, Density Bonus Law, SB 35, and SB 330, can operate effectively.

16. The accommodation of housing needs specifically includes addressing the relationship between interregional and intraregional jobs and housing to further the goal of significantly reducing California's greenhouse gas emissions.

17. In furtherance of these purposes, the Legislature amended the RNHA between 2008 and 2018 to address insufficient housing in "job centers," such as the Bay Area. The Legislature found and declared that:

> [I]nsufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.

18. The Legislature amended the RHND Statute in 2008 per The Sustainable Communities and Climate Protection Act ("SB 375"). SB 375 was the first statewide legislation in the nation to link inadequate housing in job centers, to climate change. The intent of SB 375 was to further the objective of building more homes closer to jobs and transit so that Californians drive less frequently and/or travel shorter distances, thereby reducing their greenhouse gas

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emissions. The Legislature recognized that "[t]he transportation sector is the single largest contributor of greenhouse gases of any sector." The Legislature declared that "it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation" and that "[c]hanges in land use and transportation policy, based upon established modeling methodology, will provide significant assistance to California's goals to implement the federal and state Clean Air Acts and to reduce its dependence on petroleum."

19. To further the goal of significantly reducing greenhouse gas emissions, SB 375 amended the RHND Statute to require HCD to expressly address "[t]he relationship between jobs and housing, including any imbalance between jobs and housing" in its RHND for each region. SB 375 also added a substantive mandate that each region's "existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing within the region using the regional employment projections in the applicable regional transportation plan." Relatedly, SB 375 amended the regional transportation plan statute, Gov. Code § 65080 ("RTP Statute"), to require that cities prepare a "sustainable communities strategy" as part of its regional transportation plan to reduce greenhouse gas emissions, statewide. (Gov. Code § 65080(b)(2).) Part and parcel of that strategy is, where relevant, consideration of "**the impacts of regional jobs-housing balance on interregional travel and greenhouse gas emissions** . . . ." (Gov. Code § 65080(b)(2)(A)(i).) Further, that strategy "shall consider the state housing goals specified in Sections 65580 and 65581 [the RHND Statute], [and] set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions . . . ." (Gov. Code § 65080(b)(2)(B).)

20. In 2018, the Legislature amended the RHND Statute again via SB 828. The amendments under SB 828 directed HCD to "[p]romot[e] an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction. (Gov. Code § 65584(d)(3).) The amendments further strengthened the RNHA's objective to achieve

reduction of the region's greenhouse gases. (Gov. Code § 65584(d)(2).) Senator Scott Weiner, who introduced SB 828, and Dr. Kammen, a professor of energy at the University of California, Berkeley, explained the relationship between jobs, housing and greenhouse gas emissions:

> The relationship between housing and transportation emissions is not complicated. The housing crisis in our cities and job centers — California is short 3.5 million homes, according to a report by the McKinsey Global Institute — is forcing more workers to "drive till they qualify," the term used by real estate agents for what a growing number of Californians have to do to find housing they can afford. **As cities that are job centers make it hard or impossible to build housing . . . people who are priced out move further away, resulting in sprawl that covers up farmland and open space, clogs freeways and increases greenhouse gas emissions**.[1]

21. Put another way, a higher RHND in job centers such as the Bay Area, and the resulting increased housing production, will lower per capita greenhouse gas emissions due to reduction of interregional/intraregional commutes.

22. In determining a region's housing needs, the RHND Statute requires HCD to "meet and consult with the council of governments regarding the assumptions and methodology to be used by the department." Per Gov. Code § 65584.01(b), regional government is required to provide the following data assumptions to HCD, if available:

> (A) Anticipated household growth associated with projected population increases.
> (B) Household size data and trends in household size.
> (C) The percentage of households that are overcrowded and the overcrowding rate for a comparable housing market. . . .
> (D) The rate of household formation, or headship rates, based on age, gender, ethnicity, or other established demographic measures.
> (E) The vacancy rates in existing housing stock, and the vacancy rates for healthy housing market functioning and regional mobility, as well as housing replacement needs . . . .
> (F) Other characteristics of the composition of the projected population.
> **(G) The relationship between jobs and housing, including any imbalance between jobs and housing.**
> (H) The percentage of households that are cost burdened and the rate of housing cost burden for a healthy housing market . . . .

[1] https://www.nytimes.com/2019/03/25/opinion/california-home-prices-climate.html (emph. add.).

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> (I) The loss of units during a state of emergency that was declared by the Governor pursuant to the California Emergency Services Act . . . .
>
> (Gov. Code § 65584.01(b)(1), emph. add.)

23. No public hearings are required for the determination of the RHND, and there is no opportunity for the public to present comments or objections.

24. Regional government's role in determining the RHND is only advisory. HCD may accept, reject or modify regional government's data assumptions, but in all cases HCD "***shall*** make determinations in writing on the assumptions for each of the factors listed in subparagraphs (A) to (I), inclusive, of paragraph (1) and the methodology it shall use and shall provide these determinations to the council of governments." (Gov. Code § 65584.01(b)(2), emph. add.) The need determinations "***shall*** reflect the achievement of a feasible balance between jobs and housing within the region using the regional employment projections in the applicable regional transportation plan." (Gov. Code § 65584.01(c)(1), emph. add.) The methodology used must further the following objectives of the RHND Statute: (1) Increase the housing supply and mix of housing types, tenure, and affordability; (2) "Promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, **and the achievement of the region's greenhouse gas reductions targets . . . pursuant to [the RTP Statute]"**; (3) **Promote an improved intraregional relationship between jobs and housing**; (4) Balance disproportionate household income distributions; and (5) Affirmatively further fair housing. (Gov. Code § 65584(d).)

25. On May 28, 2020, ABAG provided data assumptions for the following factors in the RHND Statute: (1) population growth projections; (2) cost burdened households; (3) overcrowding; (4) vacancy rates; (5) headship rates; (6) housing units lost in the state of emergency. ABAG did not provide any data regarding "the relationship between jobs and housing, including any imbalance between jobs and housing." (Gov. Code § 65584.01(b)(1)(G).)

26. In a letter dated June 9, 2020, HCD provided ABAG with the RHND for the Bay

Area ("ABAG RHND"). Despite being required by the RHND Statute to make determinations in writing on the relationship between jobs and housing, including any imbalance, (Gov. Code §§ 65584.01(b)(1(G); 65584.01(c)(1)) HCD failed to consider this element in the ABAG RHND:

HCD REGIONAL HOUSING NEED DETERMINATION:
ABAG June 30, 2021 through December 31, 2030

Methodology

ABAG: PROJECTION PERIOD (8.5 years) **HCD Determined Population, Households, & Housing Unit Need**		
Reference No.	Step Taken to Calculate Regional Housing Need	Amount
1.	**Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)**	8,273,975
2.	*- Group Quarters Population: December 31 2030 (DOF June 30 2030 projection adjusted + 6 months to December 31 2030)*	-169,755
3.	**Household (HH) Population**	8,159,280
4.	**Projected Households**	**3,023,735**
5.	+ Vacancy Adjustment (3.27%)	+98,799
6.	+ Overcrowding Adjustment (3.13%)	+94,605
7.	+ Replacement Adjustment (.50%)	+15,120
8.	*- Occupied Units (HHs) estimated June 30, 2022*	-2,800,185
9.	+ Cost-burden Adjustment	+9,102
Total	**6th Cycle Regional Housing Need Assessment (RHNA)**	**441,176**

27. The result of HCD's failure to consider the relationship between jobs and housing in the Bay Area (a "super-commuter" region)[2] including the impacts of the jobs-housing balance on both intraregional and interregional commutes, is that the projected housing needs in the ABAG RHND were severely underestimated. If HCD had considered the jobs-housing balance, as it was required to do under the RHND Statute, it could have potentially increased the total number of housing units in the ABAG RHND by a range of approximately 86,000 to 138,000.[3] A higher RHND and the resulting increased housing production within the Bay Area would

[2] *Ibid.*

[3] Elmendorf, Christopher S., Ethan Elkind, Michael Lens, Michael Manville, Nicholas Marantz, Paavo Monkkonen, Moira O'Neill, and Jessica Trounstine. *Regional Housing Need in California: The San Francisco Bay Area*. UCLA Lewis Center for Regional Policy Studies, p.6 (7.1.2020)

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lower per capita greenhouse gas emissions, as intended by SB 375 and SB 828.[4]

28. Further, while the number of housing units in ABAG's RHND had increased since the last determination by 135%, this increase was substantially smaller than California's other major metropolitan area, the Southern California Association of Governments, which was increased by 229%.[5]

29. ABAG had an opportunity to appeal the ABAG RHND for 30 days after its issuance. ABAG decided against appealing, however, because HCD had accepted all of ABAG's data assumptions and methodology suggestions.

30. On September 18, 2020, ABAG's Housing Methodology Committee recommended a proposed methodology to allocate the housing need determination under the RHND to the cities and counties in the Bay Area. (See, Gov. Code § 65584.04.) ABAG's Regional Planning Committee voted to recommend the proposed methodology on October 1, 2020. On October 15, 2020, ABAG's Executive Board approved the proposed methodology.

FIRST CAUSE OF ACTION
(Writ of Mandate CCP § § 1085 – Against HCD and Does Respondents)

31. Petitioners incorporate here by reference the allegations contained in Paragraphs 1 through 30 of this Petition and Complaint.

32. **Petitioners do not seek a stay of ABAG's allocation of HCD's housing determination under the RHND**. Petitioners request this Court compel HCD to supplement its total determination under the RHND with any additional housing needs after consideration of the relationship between jobs and housing, including the impacts of the jobs-housing balance on both intraregional and interregional commutes, and any imbalance thereof.

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[4] Also see, https://calmatters.org/commentary/my-turn/2021/01/how-will-a-declining-population-impact-california/ ["[T]he backlog of housing need [in California] is likely to remain for a while even if population growth stagnates. NIMBYs are sure to argue that the end of population growth means there's no housing crisis. But home prices are still high, with the average price in the Bay Area still at more than $1 million. **The reason is simple: California has under-produced housing since the late '80s. It will take years – if not decades – of aggressive housing production to reverse that trend.**" (emph. add.)]

[5] *Id.* at p. 5.

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33. Respondents have a clear, present, ministerial duty under the RHND Statute to consider the relationship between jobs and housing, including any imbalance thereof, in its methodology for every RHND. Respondents violated this ministerial obligation when it failed to consider the Bay Area jobs-housing relationship, including any imbalance thereof, in the ABAG RHND. Respondents' policy, pattern, and practice, has been not to consider the relationship between jobs and housing, including any imbalance thereof, in its methodology for ABAG's past and present RHNDs. Petitioners therefore request the Court issue a writ of mandate directing Respondents to obtain and consider data related to the jobs-housing relationship in the Bay Area and revise and supplement the ABAG RHND based on this data, as HCD is required to do under the RHND Statute.

34. Petitioners have a clear, present, and beneficial interest in ensuring Respondents comply with their aforesaid duties. Petitioners have a direct and substantial interest in ensuring Respondents comply with state laws requiring that it address the housing needs of Bay Area residents, and in ensuring that Respondents' decisions are in conformity with the requirements of law, and in having those requirements properly executed and its public duties enforced. Petitioners have a clear, present, and legal right to Respondents' performance of their legal duties as described herein, and Respondents have failed and refused to perform their duties and/or abused their discretion in doing so. Petitioners do not have a plain, speedy, or adequate remedy in the ordinary course of law, and therefore writ relief is necessary to compel Respondents to correct their actions, which are unlawful.

35. Petitioners are entitled to attorneys' fees under CCP § 1021.5 and/or Govt. Code § 800(a).

SECOND CAUSE OF ACTION
(Declaratory Relief - Code Civ. Proc. § 1060 – Against HCD and Does Respondents)

36. Petitioners incorporate here by reference the allegations contained in Paragraphs 1 through 35 of this Petition and Complaint.

37. An actual controversy has arisen and now exists between Petitioners and Respondents concerning the obligations and duties of Respondents under the RHND Statute. As

set forth herein, Petitioners contend that Respondents are required to consider the relationship between jobs and housing, including any imbalance thereof, in the ABAG RHND; Respondents have failed to consider the relationship between jobs and housing in the ABAG RHND, and have, as a pattern and practice and/or policy, consistently failed to consider the relationship between jobs and housing in past and present ABAG RHNDs. Petitioners are informed and believe, and on that basis alleges, that Respondents contend in all respects to the contrary. A judicial determination and declaration as to the aforesaid issues is therefore necessary and appropriate.

WHEREFORE, Petitioners demand judgment against Respondents for the following:

1. For alternative and/or peremptory writs of mandamus or mandate, or other appropriate relief, including a declaration or injunction, compelling Respondents to comply with their duties under the RHND Statute for all of the reasons alleged above;

2. For a declaratory judgment pursuant to Code Civ. Proc. § 1060, declaring that Respondents violated their duties under the RHND Statute for all of the reasons alleged above;

3. For costs of suit herein;

4. For reasonable attorneys' fees under Code of Civ. Proc. § 1021.5, and/or Gov. Code §800;

5. For any other relief that the Court deems just and proper.

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Dated: February 4, 2021

ZACKS, FREEDMAN & PATTERSON, P.C.

By: Ryan J. Patterson
Emily L. Brough
Attorneys for Plaintiffs and Petitioners
YES IN MY BACK YARD,
YIMBY ACTION,
SONJA TRAUSS,
ROBERT KATTOUW,
ELIZABETH CONLAN,
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VERIFICATION

I, Sonja Trauss, declare as follows:

1. I am a natural person and a resident of the State of California. I am a petitioner and the founder of petitioner Yes in My Back Yard ("YIMBY"). I am authorized to verify this Petition for Writs of Mandate and Complaint for Declaratory Relief on behalf of YIMBY.

2. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory Relief and know its contents. The matters stated in the Petition for Writ of Mandate and Complaint for Declaratory Relief are true of my own knowledge.

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

Executed on February 4, 2021

Sonja Trauss

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VERIFICATION

I, Laura Foote, declare as follows:

1. I am a natural person and a resident of the State of California. I am the executive director of petitioner YIMBY Action. I am authorized to verify this Petition for Writs of Mandate and Complaint for Declaratory Relief on behalf of YIMBY Action.

2. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory Relief and know its contents. The matters stated in the Petition for Writ of Mandate and Complaint for Declaratory Relief are true of my own knowledge.

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

Executed on 02/04, 2021

Laura Foote

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VERIFICATION

I, Robert Kattouw, declare as follows:

1. I am a natural person and a resident of the State of California. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory Relief and know its contents. The matters stated in the Petition for Writ of Mandate and Complaint for Declaratory Relief are true of my own knowledge.

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

Executed on February 4th, 2021

Robert Kattouw

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VERIFICATION

I, Elizabeth Conlan, declare as follows:

1. I am a natural person and a resident of the State of California. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory Relief and know its contents. The matters stated in the Petition for Writ of Mandate and Complaint for Declaratory Relief are true of my own knowledge.

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

Executed on 2/4, 2021

Elizabeth Conlan

Elizabeth Conlan

VERIFICATION

I, Zaccariah Bowling, declare as follows:

1. I am a natural person and a resident of the State of California. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory Relief and know its contents. The matters stated in the Petition for Writ of Mandate and Complaint for Declaratory Relief are true of my own knowledge.

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

Executed on Feb 4th, 2021

Zaccariah Bowling

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VERIFICATION

I, Steven Buss, declare as follows:

1. I am a natural person and a resident of the State of California. I have read the foregoing Petition for Writ of Mandate and Complaint for Declaratory Relief and know its contents. The matters stated in the Petition for Writ of Mandate and Complaint for Declaratory Relief are true of my own knowledge.

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

Executed on February 4, 2021

Steven Buss