

SUPREME COURT NO.

**IN THE SUPREME COURT OF CALIFORNIA**

ARNETTE TRAVIS, ET AL.,  
PETITIONERS,  
v.  
BILL BRAND, ET AL.,  
RESPONDENTS

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After A Decision by the California Court of Appeal,  
Second Appellate District, Division Eight  
Case Nos. B298104 and B301479

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ANSWER TO PETITION FOR REVIEW

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## INTRODUCTION

Petitioners/plaintiffs Arnette Travis and Chris Voisey (“Petitioners”) commenced this action seeking injunctive relief against Respondents for alleged violations of the Political Reform Act during a City-wide election in Redondo Beach in 2017, claiming Respondents used improper committee names in campaign materials. The issue in this action is simple: Should prevailing plaintiffs and defendants be treated the same for an award of attorney fees, as stated by the language of the Political Reform Act? As both the Trial Court and Appellate Court found, pursuant to *Government Code* § 91003, the answer is indisputably, “Yes.”

The Court of Appeal correctly acknowledged that the primary issue in this action is simple, explaining:

The statute here says the trial court *may* award to a plaintiff or a defendant who prevails his costs of litigation, including reasonable attorney fees. The statute means what it says.

(Opinion at 31) This issue is as simple as the Appellate Court noted: indeed, the statute says both sides (plaintiffs and defendants) are to be treated the same. And the statute means what it says.

Petitioners wish to complicate the matter, arguing that caselaw requires a different standard for plaintiffs than defendants who prevail in cases brought under the Political Reform Act of 1974 (“PRA”), based on a unique 1986 case (*People v. Roger Hedgecock for Mayor Com.* (1986) 183 Cal. App.3d 815). The Court in *Hedgecock* dealt with a situation where defendant seeking attorney fees was not truly a prevailing defendant. *Hedgecock* involved a distinguishable situation in which the San Diego District Attorney initially filed a lawsuit against San Diego mayor Hedgecock, asserting he had failed to report contributions made to his campaign for mayor in violation of the PRA. The District Attorney pursued criminal charges and monetary

damages in the amount Hedgecock received and failed to disclose. It did not seek injunctive relief. Subsequent to the District Attorney's filing, the Fair Political Practices Commission (FPPC) agreed to prosecute the matter itself and **only after the FPPC filed its own action against Hedgecock did the District Attorney dismiss its lawsuit.** Once the District Attorney voluntarily dismissed its action, Hedgecock sought attorney fees and costs as the "prevailing party." The trial court denied Hedgecock's motion, because he did not "prevail" - a different prosecuting plaintiff had merely been substituted to proceed with the matter. The *Hedgecock* case is not similar to the instant case in any respect; its holding cannot be applied here.

Likewise, the other case upon which Petitioners claim review by the Supreme Court is necessary, *Community Cause v. Boatwright* (1987) 195 Cal. App. 3d 562, is not helpful to Petitioners. In *Boatwright*, a citizens group sued a state assemblyman for violations of the PRA, specifically failing to report an interest in a partnership and income in his statement of economic interest. The trial court entered judgment for defendant and awarded attorney fees and costs. On appeal, the attorney fee award was reversed. Plaintiff sought *damages* (not injunctive relief) against Boatwright pursuant to section 91004, *not* section 91003 which is at issue here. *Government Code* §91004 provides that "any person who intentionally or negligently violates any of the reporting requirements of the Act shall be liable in a civil action brought by the civil prosecutor or by a person residing within the jurisdiction for an amount not more than the amount or value not properly reported."

Clearly, Section 91004 does not contain any provision for the awarding of attorney fees by a prevailing party. A successful plaintiff or prevailing defendant in a Section 91004-sanctioned lawsuit for *damages* (*not injunctive relief*) must rely upon section 91012 for an award of attorney fees.

Here, Section 91003 is at issue, not Section 91004, and Respondents need not rely on Section 91012 to recover attorney fees.

This campaign-related case raises no issues of statewide importance or conflicts in the state's decisional law. The underlying facts are straight forward and supported the trial judge's findings and decision after trial. On appeal, the Appellate Court found that the decision was supported by those facts and that the trial judge's award of attorneys' fees was supported by the facts and the law.

There are no novel circumstances presented which would require the Court to "provide clear guidance to the courts and litigants" in determining whether the Political Reform Act allows recovery of attorneys' fees to defendants who successfully prevail in defending against a "private enforcement" lawsuit, seeking injunctive relief under said Act. The statute is clear that a prevailing defendant is entitled to his or her attorneys' fees and this case does not throw California law into a "state of disarray or uncertainty."

Instead, this case boils down to the trial court denying injunctive relief to the petitioners (plaintiffs) and entering Judgment against them, finding that Travis and Voisey were shills for a developer who brought and financed a frivolous, bad faith and sham lawsuit against the respondents (defendants), who opposed the developer's waterfront project. After finding the respondents did not violate any provisions of the PRA, the trial court awarded attorneys' fees to them, as allowed by statute (*Government Code* section 91003).

The Court of Appeal held that the trial court's award of attorneys' fees to the prevailing respondents (defendants) was supported by the facts and law. This court should not waste its time on such a case where the Court of Appeal acted properly. As detailed herein, the Supreme Court should deny

the Petition for Review because the Opinion is consistent with well-settled California law.

**I. STATEMENT OF FACTS**

**A. Respondents Prevailed at Trial**

In a 2017 Redondo Beach municipal election, a political action committee Rescue Our Waterfront P.A.C. (“Rescue”) successfully campaigned for a ballot measure, which was also supported by the two candidates, Bill Brand (for Mayor) and Nils Nehrenheim (for City Council). After the election, two citizens (Arnette Travis and Chris Voisey) sued the committee and candidates claiming the candidates had controlled the committee, which had used an improper title for itself. Travis and Voisey also sued Wayne Craig, the principal of Rescue, as well as Brand’s campaign committee (Brand For Mayor 2017) and volunteer treasurer, Linda Moffat.

The ballot measure approved building restrictions in the City’s harbor and pier areas. The lawsuit sought injunctive relief against the defendants by way of compelling defendants to amend their campaign statements and also sought attorneys’ fees as private attorney general action. The trial court vindicated the political action committee and Craig and the candidates, Brand and Nehrenheim (including Treasurer Moffat and Brand’s Mayoral Committee) and awarded attorneys’ fees to the prevailing defendants, following a hearing on a motion for attorneys’ fees.

**B. Respondents Prevailed at The Court of Appeal**

The Court of Appeal affirmed the award of attorney fees and costs to respondents as against petitioners, Travis and Voisey. It accepted all evidence supporting the trial court’s order, disregarding contrary evidence and drawing all reasonable inferences to affirm the trial court. It did not reweigh the evidence. It found that if substantial evidence supports factual

findings, those findings must not be disturbed on appeal. *Schmidt v. Superior Court* (2020) 44 Cal. App. 5<sup>th</sup> 570, 581.

The appellate court found that substantial evidence supported the trial court's finding Rescue was a general purpose committee. It found that the trial court could properly determine Rescue was a general purpose committee that did not need to reclassify itself, and that Rescue was not involved in running the principal campaign for Measure C.

The appellate court further found that sufficient evidence showed neither Nehrenheim nor Brand controlled Rescue. Neither had significant influence over Rescue, neither shared office space with Rescue, and neither controlled or had significant influence over Rescue's messaging. The appellate court found that there was ample evidence that demonstrated neither candidate acted jointly with Rescue in making expenditures, and neither had access to Rescue's money. E-mails defendants exchanged between each other bolstered the trial court finding that the candidates did not control Rescue.

## **II. THERE ARE NO GROUNDS FOR REVIEW**

### **A. Legal Standard for Grounds for Supreme Court Review**

Pursuant to Cal. Rules of Court, Rule 8.500(b), the Supreme Court may review a Court of Appeal decision:

- (1) When necessary to secure uniformity of decision or to settle an important questions of law;
- (2) When the Court of Appeal lacked jurisdiction;
- (3) When the Court of Appeal decision lacked the concurrence of sufficient qualified justices; or
- (4) For the purpose of transferring the matter to the Court of Appeal for such proceedings as the Supreme Court may order.

Here, although Petitioners seek review under Rule 8.500(b)(1), the issue in this action is simple and the Opinion is consistent with California law.

## **B. The Question of Law Presented By The Petition Is Settled**

Petitioners claim that *Travis* enunciates a new standard for attorneys' fees. It does not. The appellate court opined that often the issue with an attorney fee is the amount, for example, did the court correctly calculate the hours, the hourly rate, and the total award. In that situation, the standard of review for attorney fee awards is for abuse of discretion. (E.g., *Connerly v. State Personnel Bd.* (2006) 37 Cal. 4<sup>th</sup> 1169, 1175) Petitioners have never argued that the court's fee calculation was inaccurate in amount. Instead, they contend a fee award of even one cent was improper. Instead, they argue that respondents are not entitled to attorney fees.

The appellate court found that it was required to construe the statutory requirements for an attorney fee award. Thus, its review is independent. (See *Connerly, supra*, 37 Cal. 4<sup>th</sup> at p. 1175).

The trial court awarded fees under *Government Code* section 91003 and under *Code of Civil Procedure* section 1021.5. These statutes are alternative bases for the fee award. The appellate court affirmed the award under *Government Code* section 91003 and did not consider whether attorney fees were allowed under *C.C.P.* section 1021.5.

The appellate court reiterated that subdivision (a) of the *Government Code* section 91003 provides: "The court may award to a plaintiff or defendant who prevails his costs of litigation, including reasonable attorney's fees." That section applies to cases seeking injunctive relief to enjoin violations or to compel compliance with the provisions of the Political Reform Act (section 91003(a).) The appellate court held that "the section applies because Travis and Voisey sought injunctive relief under that law." (Opinion at 29)

**C. There Is No Need for Review Because the Decision Below Is Consistent With Controlling Authority**

Respondents prevailed against petitioners at trial. The clear meaning of Section 91003 authorizes the fee award in favor of the prevailing defendants (respondents herein). While petitioners claim they must pay fees only if their lawsuit was “frivolous, unreasonable, or without justification,” they misread the statute (section 91003). No such finding is required under the section.

Petitioners cite *People v. Roger Hedgecock for Mayor Com.* (1986) 183 Cal. App. 3d 810 and *Community Cause v. Boatwright* (1987) 195 Cal. App. 3d 562 for their position that their lawsuit must be frivolous, unreasonable or without justification for defendants to be entitled to attorney fees.

These arguments are unavailing, because in *Hedgecock*, the defendant seeking attorney fees was not truly a “prevailing” defendant. The San Diego District Attorney initially filed a lawsuit against San Diego mayor Hedgecock, asserting he had failed to report contributions made to his campaign for mayor in violation of the PRA, pursuing criminal charges and monetary damages in the amount Hedgecock received and failed to disclose, *not injunctive relief*. Subsequently, the FPPC agreed to prosecute the matter itself and **only after the FPPC filed its own action against Hedgecock did the District Attorney dismiss its lawsuit**. At that point, because the District Attorney voluntarily dismissed its action, Hedgecock sought attorney fees and costs as the “prevailing party.” Hedgecock’s motion was denied because he did not “prevail” - a different prosecuting plaintiff had merely been substituted to proceed with the matter. The *Hedgecock* case is not similar to the instant case in any respect; its holding cannot be applied here.

Likewise, *Community Cause v. Boatwright* (1987) 195 Cal. App. 3d 562, is not helpful to Petitioners, because it does not involve the statute at issue here. In *Boatwright*, a citizens group sought *damages* (not injunctive relief) against a state assemblyman for violations of the Political Reform Act under Section 91004, *not section 91003*, but lost. The trial court’s award of attorney fees and costs to defendant was reversed on appeal. Section 91004 provides that “any person who intentionally or negligently violates any of the reporting requirements of the Act shall be liable in a civil action brought by the civil prosecutor or by a person residing within the jurisdiction for an amount not more than the amount or value not properly reported.” *Government Code* §91004. However, Section 91004 does not contain any provision for the awarding of attorney fees by a prevailing party. A successful plaintiff or prevailing defendant in a Section 91004-sanctioned lawsuit for *damages (not injunctive relief)* must rely upon section 91012 for an award of attorney fees. Here, Section 91003 is at issue, not Section 91004, and Respondents need not rely on Section 91012 in order to recover attorney fees.

*Hedgecock* and *Boatwright* relied on the U.S. Supreme Court case, *Christiansburg Garment Co. v. EEOC* (1978) 434 U.S. 412, 421-422, which held a court must find a plaintiff’s claims under Title VII of the Civil Rights Act to be frivolous, unreasonable, or groundless to award attorney fees to the defendant. Even if that were the applicable standard by which defendants would be entitled to receive an award of attorney fees, they have met that standard. In the trial court’s August 8, 2019 Order Re: Motions for Attorneys Fees, Non-C.C.P. 1033.5 Costs and C.C.P. 1033.5 costs, it ruled, “3. The instant lawsuit filed against the Defendants was frivolous, unreasonable and groundless and Plaintiffs were found to be shills for Redondo Beach Waterfront LLC.”

But, in 1994, the U.S. Supreme Court considerably limited *Christiansburg* in *Fogerty v. Fantasy, Inc.* (1994) 510 U.S. 517. The decision in *Fogerty* observed *Christiansburg*'s holding stemmed from its civil rights context: "Oftentimes, in the civil rights context, impecunious 'private attorney general' plaintiffs can ill afford to litigate their claims against defendants with more resources (*Id.* at 524). The high court contrasted this special setting with a more typical civil litigation, where plaintiffs 'can run the gamut from corporate behemoths to starving artists.' (*Ibid.*) The same is true of prospective defendants, the court observed.

The appellate court held the statute in this case is not like the statute in *Christiansburg*. It is more like the one in *Fogerty*. It held that "California election law disputes are more like the ordinary civil litigation setting in *Fogerty*: generalizations about plaintiffs and defendants are doubtful. This is true in this case and as a general matter."

The meaning of the statute is clear. It says the trial court may award to a plaintiff or a defendant who prevails his costs of litigation, including reasonable attorney fees. (*Govt. Code* section 91003) The statute means what it says. As the *Fogerty* decision puts it, prevailing plaintiffs and prevailing defendants are to be treated alike, and attorney fees are to be awarded to prevailing parties only as a matter of the trial court's discretion. (*Fogerty, supra*, at 534.)

The appellate court therefore upheld the trial court's exercise of its discretion to award attorney fees to the defendants, who were unquestionably the prevailing parties.

The Court of Appeal ruling in *Travis* does not create a split of authority in California between *Travis* and *Boatwright* and *Hedgecock*. Such a claim is a tortured and twisted rendition of the cases in order to gain this court's review. Here, the record is clear that *Government Code* section 91003 provides for attorney fees to prevailing defendants without any additional

hurdle, such as showing plaintiff's lawsuit to be "frivolous, unreasonable and groundless." But, even so, the trial court did make that finding because that petitioner's lawsuit was "frivolous, unreasonable and groundless," thus entitling Respondents to attorney fees in any event.

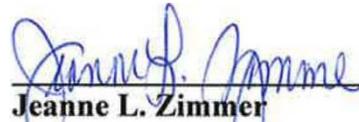
This case creates no statewide confusion or uncertainty of when prevailing parties are entitled to attorney fees under section 91003. It is within the discretion of the trial court to award these fees. Here, the trial court read the plain meaning of the statute, applied it to the facts and evidence at trial and awarded Respondents their attorney fees. Supreme Court review is not needed to "secure uniformity of law." The law is clear. The Court properly exercised its discretion, and the appellate court ruled that substantial evidence supported the trial court's factual findings and award of attorney fees to defendants. In sum, there is no reason for this Court to grant review.

### **CONCLUSION**

Based on the foregoing, Respondents NILS NEHRENHEIM, BILL BRAND, BRAND FOR MAYOR 2017, LINDA MOFFAT, WAYNE CRAIG and RESCUE OUR WATERFRONT respectfully request that the Petition for Review be denied.

Dated: May 17, 2021

JEANNE L. ZIMMER



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## VI. CERTIFICATE OF WORD COUNT

Pursuant to rule 8.204(c) of the California Rules of Court, I hereby certify that the Answer contains 2814 words, including footnotes. In making this certification, I have relied on the word count of the computer program used to prepare this brief.

Dated: May 17, 2021

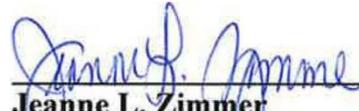
  
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**Certificate of Interested Entities Or Persons**

(California Rules of Court, Rule 8.208)

There are no interested entities or persons to list in this certificate. (California Rules of Court, Rule 8.208(e)(3)).

Dated: May 17, 2021

  
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**Jeanne L. Zimmer**  
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**PROOF OF SERVICE**

(CCP sections 1013(a) and 2015.5; FRCP 5)

I am employed in the City of Los Angeles, County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 5901 W. Century Blvd., # 1200, Los Angeles, Calif. 90045.

On May 17, 2021, I served the following document:

**ANSWER TO PETITION FOR REVIEW**

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Executed on May 17, 2021 at Los Angeles, California.

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

*Raul Arreola*

\_\_\_\_\_  
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**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **TRAVIS v. BRAND (REDONDO BEACH  
WATERFRONT)**

Case Number: **S268480**

Lower Court Case Number: **B298104**

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

5/17/2021

Date

/s/Jeanne Zimmer

Signature

Zimmer, Jeanne (123321)

Last Name, First Name (PNum)

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Carlson & Messer LLP

Law Firm

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