

IN THE CALIFORNIA SUPREME COURT

No. S268480

**ARNETTE TRAVIS ET AL.,
PETITIONERS,
V.
BILL BRAND ET AL.,
RESPONDENTS,**

After a Decision by the California Court of Appeal,

Second Appellate District, Division Eight
Case Nos. B298104 and B301479
Appeal from the Superior Court of the State of California,
Los Angeles County, Case No. BC 665330
The Honorable Malcolm H. Mackey Presiding

**RESPONDENTS' MOTION REQUESTING JUDICIAL NOTICE;
DECLARATION OF STEVAN COLIN; [PROPOSED] ORDER**

Jeanne L. Zimmer (SBN 123321)
5901 W. Century Blvd., # 1200
Los Angeles, Calif. 90045
Tel: (310) 242-2212
Attorney for Respondent,
NILS NEHRENHEIM

Stevan Colin (SBN 110360)
801 Pacific Avenue
Long Beach, Calif. 90813
Tel: (310) 379-8655
Attorney for Respondents,
BILL BRAND, BRAND FOR
MAYOR 2017, LINDA MOFFAT

Pursuant to Rule 8.54 of the California Rules of Court and California Evidence Code Sections 452 and 459, Respondents each hereby request that the Court take judicial notice of two exhibits offered in support of their ANSWER BRIEF ON THE MERITS. The authenticity of the exhibits is established by the Declaration of Stevan Colin, included herein.

The Court may take judicial notice of “[o]fficial acts of the legislative, executive, and judicial departments ... of any state of the United States.” (Evid. Code § 452(c).) The Court may also consider “facts and propositions that are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.” (Evid. Code § 452(h); see also § 459(a) [“The reviewing court may take judicial notice of any matter specified in Section 452.”].)

Exhibit 1 is a true and correct copy of the NO ACTION CLOSURE LETTER, dated April 8, 2021 regarding FPPC No. 2017-00099; In the Matter of Bill Brand, Linda Moffat, Wayne Craig, Rescue Our Waterfront PAC, Brand for Mayor 2017 which was issued by the Fair Political Practices Commission (an executive department of the State of California) to Respondents’ counsel, Stevan Colin, Esq. and Bobak Nayebedadash, Esq. on April 8, 2021. The FPPC Sworn Complaint was filed by Michael Cahalan on February 1, 2017 against the Respondents (except Nehrenheim) and alleged the same actions alleged in the petitioners’ Superior Court complaint (BC 665330) of June 15, 2017. This closure letter was received by Respondents’ counsel from the FPPC after the Court of Appeal issued its decision on March 19, 2021.

Exhibit 1 is subject to judicial notice under sections 452 and 459. The document was prepared and issued by the State of California, Fair Political Practices Commission, an executive department of the State of California and its contents are not reasonably subject to dispute. The authenticity of **Exhibit 1** is established by the Declaration of Stevan Colin, included herein.

Exhibit 2 is a true and correct copy of Petitioner, Chris Voisey's, Recipient Committee Campaign Statement (California Form 460) for the period February 14, 2021 through June 30, 2021, e-filed with the California Secretary of State's Office on August 1, 2021. The date of the Redondo Beach election, related to the filing of the 12 page document was March 2, 2021. This campaign statement pertains to the Redondo Beach Mayor's race, of which Chris Voisey was a candidate. The name of Petitioner, Chris Voisey's, candidate controlled, Recipient Committee is "Voisey For Mayor 2021." This exhibit is Chris Voisey's recipient committee's Semi-annual Statement on file with the Redondo Beach City Clerk's Office and the California Secretary of State's Office (an executive department of the State of California). The campaign committee's ID number is 1435304.

Exhibit 2 is subject to judicial notice under sections 452 and 459. The document was verified by candidate (petitioner herein) Chris Voisey and e-filed with the Redondo Beach City Clerk's Office acting as the local filing agent on behalf of the State of California Secretary of State's Office, an executive department of the State of California and its contents are not reasonably subject to dispute. The City's webpage was

prepared and published by the City of Redondo Beach, acting as local filing agent for the Secretary of State's Office. The authenticity of **Exhibit 2** is established by the Declaration of Stevan Colin, included herein.

Based upon the foregoing legal authority, and for the foregoing reasons, respondents respectfully request this court to grant this motion for judicial notice.

Respectfully submitted,

Dated: August 23, 2021

JEANNE L. ZIMMER



Jeanne L. Zimmer

Attorney for Respondent,
NILS NEHRENHEIM

Dated: August 23, 2021

STEVAN COLIN, ESQ.

/s/ Stevan Colin

BY: _____
STEVAN COLIN, ESQ.
Attorney for Respondents,
BILL BRAND, BRAND FOR
MAYOR 2017 and LINDA
MOFFAT

DECLARATION OF STEVAN COLIN

I, Stevan Colin, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California. I am the attorney for Respondents, Bill Brand, Brand For Mayor 2017 and Linda Moffat. I have personal knowledge of the matters set forth in this declaration and if called upon to testify to those matters, I could and would so testify.
2. On February 1, 2017 a Sworn Complaint was filed with the Fair Political Practices Commission by Michael Cahalan, a neighbor of Petitioner, Chris Voisey. The Complaint alleged that Rescue Our Waterfront PAC (and Wayne Craig) was operating as a general purpose committee “even though it is primarily formed.” The Complaint alleged that Bill Brand was its controlling candidate. The Sworn Complaint alleged violations of the Government Code and California Code of Regulations. The allegations mirror those in the lawsuit Petitioners filed with the Superior Court on June 15, 2015 (BC 665330).
3. In response to the Michael Cahalan complaint, the Enforcement Division of the California Fair Political Practices Commission opened a case against the Respondents, Bill Brand, Brand for Mayor 2017, Linda Moffat, Rescue Our Waterfront PAC and Wayne Craig. In connection with that FPPC case, I represented Bill Brand, Linda Moffat and the Brand For Mayor 2017 committee before the FPPC. Attorney Bobak Nayebdadash represented Wayne Craig and Resue Our Waterfront PAC in that matter.

4. Attached hereto as Exhibit 1 is a true and correct copy of the “**NO ACTION CLOSURE LETTER**” I received from the Fair Political Practices Commission on April 8, 2021. The letter states that the complaint the FPPC received on February 1, 2017 alleged that Rescue Our Waterfront failed to file as a primarily formed candidate-controlled committee and failed to properly include correct disclosures on advertisements. The FPPC closure letter acknowledges that Bill Brand did not control Rescue Our Waterfront and it acknowledges the allegations of the sworn Complaint have been disproven. The letter also states that the Enforcement Division of the FPPC has found insufficient evidence of additional advertisement violations. It therefore closed the matter (FPPC No. 2017-00099; In the Matter of Bill Brand, Linda Moffat, Wayne Craig, Rescue Our Waterfront PAC, Brand for Mayor 2017).

Exhibit 1 was not presented to the trial court because it concerns post-judgment events and did not exist at that time.

5. Attached hereto as **Exhibit 2** is a true and correct copy of the “Voisey for Mayor 2021” Recipient Committee Campaign Statement e-filed through the Redondo Beach City Clerk’s Office campaign portal, local filing agent for the State of California Secretary of State’s Office, on August 1, 2021. Candidates for local office in Redondo Beach file their campaign finance statements through the City of Redondo Beach’s Clerk’s Office. The Redondo Beach City Clerk serves as the local filing agent for the California Secretary of State’s Office. This is a true and correct copy of the Semi-annual Statement of Chris Voisey’s recipient committee campaign statement which covers the period February 14, 2021 through June 30, 2021. This campaign statement pertains to

contributions received and expenditures made by the Voisey campaign committee related to the Redondo Beach Mayor's race which was held on March 2, 2021. Mr. Voisey was a candidate for Mayor in that race and appeared on the City of Redondo Beach's March 2, 2021 ballot. The campaign statement can be obtained from the official election portal link for all campaign and political action committee filings with the City of Redondo Beach Clerk's Office at www.Redondo.org. I obtained the copy of Exhibit 2 from the City's website on August 23, 2021. Mr. Voisey's campaign committee identification number is 1435304.

Exhibit 2 was not presented to the trial court because it concerns post-judgment events and did not exist at the time.

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

Executed on August 23, 2021 in Redondo Beach, California.

/s/ Stevan Colin

Stevan Colin

EXHIBIT 1



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3000 • Sacramento, CA 95811

April 8, 2021

Stevan Colin
o/b/o Bill Brand, Brand for Mayor 2017, Linda Moffat,
Via email: stevan.colin@gabriel-law.com

Bobak Nayebadash
o/b/o Wayne Craig, Rescue Our Waterfront PAC
Via email: bobak@protectionlawgroup.com

No Action Closure Letter

**FPPC No. 2017-00099; In the Matter of Bill Brand, Linda Moffat, Wayne Craig,
Rescue Our Waterfront PAC, Brand for Mayor 2017**

Dear Mr. Colin and Mr. Nayebadash,

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act").¹ On February 1, 2017, we received a complaint against the above-referenced committees/persons. Specifically, the complaint alleged that Rescue Our Waterfront PAC failed to file as a primarily formed, candidate-controlled committee, and failed to properly include correct disclosures on advertisements.

On April 8, 2019, the Honorable Malcolm H. Mackey issued a judgment after court trial and a statement of decision finding, in part, that Rescue Our Waterfront PAC was judicially determined to have always been a general purpose committee and was not required to amend its status to a primarily formed committee and that the defendant Bill Brand did not control Rescue Our Waterfront PAC. The violations alleged in the sworn complaint regarding the failure of Rescue Our Waterfront PAC to file as a primarily formed committee or as a candidate-controlled committee have been disproven. With respect to the allegations that Rescue Our Waterfront PAC failed to include correct disclosures on advertisements, to the extent that this complaint was related to the allegation of mis-designation of the committee, the allegations have been disproven. The Enforcement Division has found insufficient evidence of additional advertisement violations.

In addition, the Enforcement Division received an anonymous complaint against the Rescue Our Waterfront PAC alleging that the committee misused ballot measure funds for legal fees. These legal fees were reported on campaign funds. Legal fees are a permissible use of campaign funds in certain circumstances, as described in Section 89514. The Enforcement Division has found insufficient evidence to establish that the expenditures were unlawful. As such, the Enforcement

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of Title 2 of the California Code of Regulations.

Division is closing the matter with this letter. Thank you for your time and attention to this matter. Please do not hesitate to call if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Theresa Gilbertson", with a stylized flourish at the end.

Theresa Gilbertson
Senior Commission Counsel
Enforcement Division

CC: Michael Cahalan, complainant

EXHIBIT 2

(Government Code Sections 84200-84216.5)

Statement covers period	
from	02/14/2021
through	06/30/2021

03/02/2021

For Official Use Only

CALIFORNIA 460
FORM

E-Filed
08/01/2021
15:22:25
Filing ID:
200968738

☒ **Officerholder, Candidate Controlled Committee**
☐ **State Candidate Election Committee**
☐ **Recall**
(Also Complete Part 5)

☐ **General Purpose Committee**
☐ **Sponsored**
☐ **Small Contributor Committee**
☐ **Political Party/Central Committee**

☐ **Primarily Formed Candidate/Officerholder Committee**
(Also Complete Part 7)

☐ **Primarily Formed Ballot Measure Committee**

☐ Preelection Statement
 ☒ Special Odd-Year Report
 ☐ Quarterly Statement

☐ Semi-annual Statement
 ☐ Supplemental Preelection Statement - Attach Form 495

☐ Termination Statement
 ☐ Statement - Attach Form 495

☐ Amendment (Explain below)

I.D. NUMBER
1435304

Voisey for Mayor 2021

NAME OF TREASURER

Gary Crummitt

MAILING ADDRESS

STREET ADDRESS (NO P.O. BOX)

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Long Beach	CA	90802	(562) 983-0815

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Long Beach	CA	90802	(562) 983-081

NAME OF ASSISTANT TREASURER IF ANY

MAILING ADDRESS (IF DIFFERENT) NO. AND STREET OR P.O. BOX

CITY	STATE	ZIP CODE	AREA CODE/PHONE
Redondo Beach	CA	90277	

CITY _____ STATE _____ ZIP CODE _____ AREA CODE/PHONE _____

OPTIONAL: FAX / E-MAIL ADDRESS
chris@voisey4rbmayor.org

OPTIONAL: FAX / E-MAIL ADDRESS

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge and belief, the foregoing is true and correct.

Signature of Treasurer or Assistant Treasurer

Signature of Controlling Officerholder: Candidate: State Measure Proponent or Responsible Officer of Sponsor

Signature of Controlling Officeholder, Candidate, State Measure Proponent

Signature of Controlling Officerholder, Candidate, State Measure Proponent

FPPC Advice: advice@fppc.ca gov (866/275-3772)

www.netfile.com

Recipient Committee
Campaign Statement
Cover Page — Part 2

COVER PAGE - PART 2

CALIFORNIA
FORM 460

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5. Officeholder or Candidate Controlled Committee

NAME OF OFFICEHOLDER OR CANDIDATE			
Christopher Voisey			
OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)			
Mayor: Redondo Beach			
RESIDENTIAL/BUSINESS ADDRESS (NO. AND STREET)		CITY	STATE ZIP
Redondo Beach		CA	90277

Related Committees Not Included in this Statement: List any committees not included in this statement that are controlled by you or are primarily formed to receive contributions or make expenditures on behalf of your candidacy.

COMMITTEE NAME	I.D. NUMBER		
NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO		
COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)		
CITY	STATE	ZIP CODE	AREA CODE/PHONE
COMMITTEE NAME	I.D. NUMBER		
NAME OF TREASURER	CONTROLLED COMMITTEE? <input type="checkbox"/> YES <input type="checkbox"/> NO		
COMMITTEE ADDRESS	STREET ADDRESS (NO P.O. BOX)		
CITY	STATE	ZIP CODE	AREA CODE/PHONE

6. Primarily Formed Ballot Measure Committee

NAME OF BALLOT MEASURE	
BALLOT NO. OR LETTER	JURISDICTION
	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
Identify the controlling officeholder, candidate, or state measure proponent, if any.	
NAME OF OFFICEHOLDER, CANDIDATE, OR PROONENT	
OFFICE SOUGHT OR HELD	DISTRICT NO. IF ANY

7. Primarily Formed Candidate/Officeholder Committee List names of officeholder(s) or candidate(s) for which this committee is primarily formed.

NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE
NAME OF OFFICEHOLDER OR CANDIDATE	OFFICE SOUGHT OR HELD	<input type="checkbox"/> SUPPORT <input type="checkbox"/> OPPOSE

Attach continuation sheets if necessary

Campaign Disclosure Statement Summary Page

Amounts may be rounded
to whole dollars.

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Voisey for Mayor 2021

Statement covers period

from 02/14/2021

through 06/30/2021

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I.D. NUMBER

1435304

Contributions Received

Column A
TOTAL THIS PERIOD
(FROM ATTACHED SCHEDULES)

Column B
CALENDAR YEAR
TOTAL TO DATE

Calendar Year Summary for Candidates Running in Both the State Primary and General Elections

1. Monetary Contributions	Schedule A, Line 3	\$ 3,647.18	\$ 8,926.18
2. Loans Received	Schedule B, Line 3	0.00	0.00
3. SUBTOTAL CASH CONTRIBUTIONS	Add Lines 1 + 2	3,647.18	8,926.18
4. Nonmonetary Contributions	Schedule C, Line 3	5,856.75	5,856.75
5. TOTAL CONTRIBUTIONS RECEIVED	Add Lines 3 + 4	9,503.93	14,782.93

1/1 through 6/30 7/1 to Date

20. Contributions Received \$

21. Expenditures Made \$

Expenditures Made

Expenditure Limit Summary for State Candidates

6. Payments Made	Schedule E, Line 4	\$ 7,984.63	\$ 8,097.89
7. Loans Made	Schedule H, Line 3	0.00	0.00
8. SUBTOTAL CASH PAYMENTS	Add Lines 6 + 7	7,984.63	8,097.89
9. Accrued Expenses (Unpaid Bills)	Schedule F, Line 3	-9,675.20	920.00
10. Nonmonetary Adjustment	Schedule C, Line 3	5,856.75	5,856.75
11. TOTAL EXPENDITURES MADE	Add Lines 8 + 9 + 10	4,166.18	14,874.64

22. Cumulative Expenditures Made* (If Subject to Voluntary Expenditure Limit)

Date of Election (mm/dd/yy)

Total to Date

/ / \$

Current Cash Statement

12. Beginning Cash Balance	Previous Summary Page, Line 16	\$ 5,264.74
13. Cash Receipts	Column A, Line 3 above	3,647.18
14. Miscellaneous Increases to Cash	Schedule I, Line 4	0.00
15. Cash Payments	Column A, Line 8 above	7,984.63
16. ENDING CASH BALANCE	Add Lines 12 + 13 + 14, then subtract Line 15	\$ 927.29

If this is a termination statement, Line 16 must be zero.

17. LOAN GUARANTEES RECEIVED

Schedule B, Part 2

0.00

Cash Equivalents and Outstanding Debts

18. Cash Equivalents	See instructions on reverse	\$ 0.00
19. Outstanding Debts	Add Line 2 + Line 9 in Column B above	\$ 920.00

*Amounts in this section may be different from amounts reported in Column B.

Schedule A Monetary Contributions Received

Amounts may be rounded
to whole dollars.

SCHEDULE A

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Voisey for Mayor 2021

Statement covers period
from 02/14/2021
through 06/30/2021

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I.D. NUMBER

1435304

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
02/17/2021	Fred Bruning Rancho Palos Verdes, CA 90275	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Property Manager/Developer CenterCal Properties LLC	950.00	950.00	
02/20/2021	John Cullen Redondo Beach, CA 90277	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired Retired	150.00	150.00	
03/11/2021	Erika Snow Robinson for City Council 2021 (ID# 1436225) Redondo Beach, CA 90277	<input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		270.00	270.00	
03/01/2021	Hennesseys Tavern, Inc. Redondo Beach, CA 90277	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		500.00	500.00	
03/11/2021	Moses for City Council 2021 (ID# 1435633) Redondo Beach, CA 90277	<input type="checkbox"/> IND <input checked="" type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		260.00	260.00	

SUBTOTAL \$	2,130.00
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Schedule A Summary

1. Amount received this period – itemized monetary contributions.
(Include all Schedule A subtotals.) \$ 3,480.00

2. Amount received this period – unitemized monetary contributions of less than \$100 \$ 167.18

3. Total monetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Line 1.) **TOTAL \$** 3,647.18

*Contributor Codes
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other (e.g., business entity)
PTY – Political Party
SCC – Small Contributor Committee

Schedule A (Continuation Sheet) Monetary Contributions Received

SCHEDULE A (CONT.)

Amounts may be rounded
to whole dollars.

Statement covers period from 02/14/2021 through 06/30/2021		CALIFORNIA FORM 460
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NAME OF FILER			I.D. NUMBER			
Voisey for Mayor 2021			1435304			
DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL, ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN. 1 - DEC. 31)	PER ELECTION TO DATE (IF REQUIRED)
03/01/2021	Redondo Auto Spa LLC Redondo Beach, CA 90277	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		250.00	250.00	
03/11/2021	Firoozeh Shakeri Hawthorne, CA 90250	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Real Estate Firoozeh Shakeri	500.00	500.00	
02/16/2021	Waller for City Council 2021 ID #1434383 Redondo Beach, CA 90277	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		600.00	600.00	
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC				
SUBTOTAL \$				1,350.00		

*Contributor Codes
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other (e.g., business entity)
PTY – Political Party
SCC – Small Contributor Committee

Schedule C Nonmonetary Contributions Received

Amounts may be rounded
to whole dollars.

SCHEDULE C

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Statement covers period
from 02/14/2021
through 06/30/2021

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

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I.D. NUMBER

Voisey for Mayor 2021

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	AMOUNT/ FAIR MARKET VALUE	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
03/11/2021	Chris Voisey Redondo Beach, CA 90277	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		Bill Paid By Third Party	5,856.75	5,856.75	
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					
		<input type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC					

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$ 5,856.75

Schedule C Summary

- Amount received this period – itemized nonmonetary contributions.
(Include all Schedule C subtotals.) \$ 5,856.75
- Amount received this period – unitemized nonmonetary contributions of less than \$100 \$ 0.00
- Total nonmonetary contributions received this period.
(Add Lines 1 and 2. Enter here and on the Summary Page, Column A, Lines 4 and 10.) TOTAL \$ 5,856.75

*Contributor Codes
IND – Individual
COM – Recipient Committee
(other than PTY or SCC)
OTH – Other (e.g., business entity)
PTY – Political Party
SCC – Small Contributor Committee

Schedule E
Payments Made

Amounts may be rounded
to whole dollars.

Statement covers period
from 02/14/2021
through 06/30/2021

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SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Voisey for Mayor 2021

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I.D. NUMBER

1435304

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

OMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production costs
ONS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	FET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	PHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
ND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Crummitt & Associates Long Beach, CA 90802	PRO			520.00
Crummitt & Associates Long Beach, CA 90802	PRO			770.00
Crummitt & Associates Long Beach, CA 90802	PRO			520.00

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUBTOTAL \$ 1,810.00

Schedule E Summary

- Itemized payments made this period. (Include all Schedule E subtotals.) \$ 7,924.99
- Unitemized payments made this period of under \$100 \$ 59.64
- Total interest paid this period on loans. (Enter amount from Schedule B, Part 1, Column (e).) \$ 0.00
- Total payments made this period. (Add Lines 1, 2, and 3. Enter here and on the Summary Page, Column A, Line 6.) TOTAL \$ 7,984.63

Schedule E (Continuation Sheet) Payments Made

Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from 02/14/2021 through 06/30/2021		C.A. FORM 460	
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SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

Voisey for Mayor 2021

I.D. NUMBER
1435304

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

OMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production costs
CNS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	PET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	PHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
ND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Crummitt & Associates Long Beach, CA 90802	PRO			520.00
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	4.96
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	1.63
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	37.88
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	43.25

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUB TOTAL \$ 607.72

Schedule E (Continuation Sheet) Payments Made

Amounts may be rounded
to whole dollars.

SCHEDULE E (CONT.)

Statement covers period from 02/14/2021 through 06/30/2021		C.A. FORM 460	
		Page 9 of 12	

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Voisey for Mayor 2021

I.D. NUMBER

1435304

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

OMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production costs
CNS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	PET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	PHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
ND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	27.50
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	8.57
E- Fundraising Connections Sacramento, CA 95814			Credit Card Processing Fees	2.75
Klein Creative Media Redondo Beach, CA 90277			Social Media	500.00
Shanahan Printing & Graphics, Inc. Torrance, CA 90505	LIT			1,153.93

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

SUB TOTAL \$ 1,692.75

Schedule E
(Continuation Sheet)
Payments Made

SCHEDULE E (CONT.)

Amounts may be rounded
to whole dollars.

Statement covers period
from 02/14/2021
through 06/30/2021

CALIFORNIA
FORM
460

Page 10 of 12

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Voisey for Mayor 2021

I.D. NUMBER
1435304

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

OMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production costs
CNS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	PET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	RHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
ND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

NAME AND ADDRESS OF PAYEE (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Marc Sussman Los Angeles, CA 90022	CNS			1,000.00
Chris Voisey Redondo Beach, CA 90277	FIL			1,300.00
Chris Voisey Redondo Beach, CA 90277	POS			1,514.52

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.	SUB TOTAL \$	3,814.52
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Schedule F Accrued Expenses (Unpaid Bills)

Amounts may be rounded
to whole dollars.

Statement covers period
from 02/14/2021
through 06/30/2021

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

Voisey for Mayor 2021

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I.D. NUMBER

1435304

CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

OMP	campaign paraphernalia/misc.	MBR	member communications	RAD	radio airtime and production costs
CNS	campaign consultants	MTG	meetings and appearances	RFD	returned contributions
CTB	contribution (explain nonmonetary)*	OFC	office expenses	SAL	campaign workers' salaries
CVC	civic donations	PET	petition circulating	TEL	t.v. or cable airtime and production costs
FIL	candidate filing/ballot fees	PHO	phone banks	TRC	candidate travel, lodging, and meals
FND	fundraising events	POL	polling and survey research	TRS	staff/spouse travel, lodging, and meals
IND	independent expenditure supporting/opposing others (explain)*	POS	postage, delivery and messenger services	TSF	transfer between committees of the same candidate/sponsor
LEG	legal defense	PRO	professional services (legal, accounting)	VOT	voter registration
LIT	campaign literature and mailings	PRT	print ads	WEB	information technology costs (internet, e-mail)

	NAME AND ADDRESS OF CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR DESCRIPTION OF PAYMENT	(a) OUTSTANDING BALANCE BEGINNING OF THIS PERIOD	(b) AMOUNT INCURRED THIS PERIOD	(c) AMOUNT PAID THIS PERIOD (ALSO REPORT ON E)	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
Crummitt & Associates Long Beach, CA 90802	PRO		770.00	0.00	770.00	0.00
Klein Creative Media Redondo Beach, CA 90277	Campaign Video		0.00	920.00	0.00	920.00
Shanahan Printing & Graphics, Inc. Torrance, CA 90505	LIT		1,153.93	0.00	1,153.93	0.00
SUBTOTALS \$			1,923.93\$	920.00\$	1,923.93\$	920.00

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

Schedule F Summary

1. Total accrued expenses incurred this period. (Include all Schedule F, Column (b) subtotals for accrued expenses of \$100 or more, plus total unitemized accrued expenses under \$100.) **INCURRED TOTALS \$** -4,936.75
2. Total accrued expenses paid this period. (Include all Schedule F, Column (c) subtotals for payments on accrued expenses of \$100 or more, plus total unitemized payments on accrued expenses under \$100.) **PAID TOTALS \$** 4,738.45
3. Net change this period. (**Subtract** Line 2 from Line 1. Enter the difference here and on the Summary Page, Column A, Line 9.) **NET \$** -9,675.20
May be a negative number

Schedule F (Continuation Sheet) Accrued Expenses (Unpaid Bills)

SCHEDULE F (CONT.)

Amounts may be rounded
to whole dollars.

Statement covers period from 02/14/2021 through 06/30/2021		CALIFORNIA FORM 460
		Page 12 of 12

NAME OF FILER Voisey for Mayor 2021	ID. NUMBER 1435304
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CODES: If one of the following codes accurately describes the payment, you may enter the code. Otherwise, describe the payment.

- | | | |
|---|---|---|
| OMP campaign paraphernalia/misc. | MBR member communications | RAD radio airtime and production costs |
| CNS campaign consultants | MITG meetings and appearances | RFD returned contributions |
| CTB contribution (explain nonmonetary)* | OFC office expenses | SAL campaign workers' salaries |
| CVC civic donations | PET petition circulating | TEL t.v. or cable airtime and production costs |
| FIL candidate filing/ballot fees | PHO phone banks | TRC candidate travel, lodging, and meals |
| FND fundraising events | POL polling and survey research | TRS staff/spouse travel, lodging, and meals |
| IND independent expenditure supporting/opposing others (explain)* | POS postage, delivery and messenger services | TSF transfer between committees of the same candidate/sponsor |
| LEG legal defense | PRO professional services (legal, accounting) | VOT voter registration |
| LIT campaign literature and mailings | PRT print ads | WEB information technology costs (internet, e-mail) |

* Payments that are contributions or independent expenditures must also be summarized on Schedule D.

NAME AND ADDRESS OF CREDITOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CODE OR DESCRIPTION OF PAYMENT	(a) OUTSTANDING BALANCE BEGINNING OF THIS PERIOD	(b) AMOUNT INCURRED THIS PERIOD	(c) AMOUNT PAID THIS PERIOD (ALSO REPORT ONE)	(d) OUTSTANDING BALANCE AT CLOSE OF THIS PERIOD
Chris Voisey Redondo Beach, CA 90277	FIL	1,300.00	0.00	1,300.00	0.00
Chris Voisey Redondo Beach, CA 90277	POS	1,514.52	0.00	1,514.52	0.00
Wells Fargo Bank San Francisco, CA 94163	Voter Files/printing/mailchi mp	5,856.75	-5,856.75	0.00	0.00
SUBTOTALS \$		8,671.27 \$	-5,856.75 \$	2,814.52 \$	0.00

IN THE CALIFORNIA SUPREME COURT

No. S268480

**ARNETTE TRAVIS ET AL.,
PETITIONERS,**

V.

**BILL BRAND ET AL.,
RESPONDENTS,**

[PROPOSED] ORDER

Pursuant to Rule 8.54 of the California Rules of Court and California Evidence Code Sections 452 and 459, the Motion Requesting Judicial Notice filed by Respondents in support of their Answer Brief on the Merits is GRANTED.

The Court therefore takes judicial notice of the following documents:

Exhibit 1 – FPPC “NO ACTION CLOSURE LETTER” dated April 8, 2021 directed to Stevan Colin and Bobak Nayebdadash.

Exhibit 2 – Recipient Committee Campaign Statement (California Form 460) Of Voisey For Mayor 2021, e-filed with the City of Redondo Beach Clerk’s Office and the Secretary of State’s Office on August 1, 2021 (committee ID number 1435304) for the period February 14, 2021 through June 30, 2021.

IT IS SO ORDERED.

Dated: _____

Justice of the Supreme Court

PROOF OF SERVICE

I am employed in the City of Los Angeles, in the 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 August 23, 2021, I served the following document(s):

**RESPONDENTS' MOTION REQUESTING JUDICIAL NOTICE;
DECLARATION OF STEVAN COLIN; [PROPOSED] ORDER**


on the interested parties:

SEE ATTACHED SERVICE LIST

[X] **(VIA E-SERVICE)** As follows: I served the above-referenced document(s) to by electronic service to its intended recipient(s) indicated below VIA TRUEFILING.

[X] **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 23, 2021, at Los Angeles, CA.

_____

Raul Arreola

SERVICE LIST

Arnette Travis, et al. v. Bill Brand, et al.
California Supreme Court; Case No.: S268480

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Los Angeles Superior Court
Court Clerk, Department 55
111 N. Hill Street
Los Angeles, Calif. 90012

Clerk of the Court of Appeal
2nd Appellate District
300 S. Spring Street, Floor 2, North Tower
Los Angeles, Calif. 90013-1213

Supreme Court of California
350 McAllister Street
San Francisco, Calif. 94102-4797

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**

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **zimmerj@cmtlaw.com**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
BRIEF	Respondents Answer Brief on Merits
REQUEST FOR JUDICIAL NOTICE	Resp. Mtn Req Judicial Notice-Decl of Colin-Proposed Order

Service Recipients:

Person Served	Email Address	Type	Date / Time
Stevan Colin Gabriel & Associates 110360	stevan.colin@gabriel-law.com	e-Serve	8/23/2021 4:46:27 PM
Bobak Nayebdadash Protection Law Group, LLP 257976	bobak@protectionlawgroup.com	e-Serve	8/23/2021 4:46:27 PM
Jeanne Zimmer Carlson & Messer LLP 123321	zimmerj@cmtlaw.com	e-Serve	8/23/2021 4:46:27 PM
John Spurling Shumener Odson & Oh, LLP 252324	jspurling@soollp.com	e-Serve	8/23/2021 4:46:27 PM
Bradley Hertz The Sutton Law Firm 138564	bhertz@campaignlawyers.com	e-Serve	8/23/2021 4:46:27 PM
Bobak Nayebdadash Law Office of Bobak Nayebdadash 257976	bobakdadash@gmail.com	e-Serve	8/23/2021 4:46:27 PM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

8/23/2021

Date

/s/Jeanne Zimmer

Signature

Zimmer, Jeanne (123321)

Last Name, First Name (PNum)

Carlson & Messer LLP

Law Firm