



June 5, 2017

BY FIRST CLASS MAIL & EMAIL

California Democratic Party
1830 9th Street
Sacramento, CA 95811
Attn: Compliance Review Commission

RE: Request for Extension of Time and Production of Documents

To whom it may concern:

I am writing to request an extension of time to submit the factual basis for the challenge as outlined in the email dated June 1, 2017 from California Democratic Party (“CDP”) Executive Director Chris Myers. The extension is needed in order for my team to complete its review of election materials/documents, prepare a report in connection with my challenge, and address the various issues outlined below.

In order to complete my team’s review, we request that the CDP produce and/or make available for inspection the following the documents¹:

- 1) Documents constituting or relating to the transmission to the State Party of the appointment/election of Democratic State Central Committee member delegates;
- 2) Documents constituting or relating to the transmission to the State Party of the appointment/election of Democratic State Central Committee member proxy holders;
- 3) Documents constituting or related to the payment of member dues to the Democratic State Central Committee;
- 4) Documents constituting or related to the payment of any registration fees for the 2017 California Democratic Party Convention;
- 5) Documents constituting or related to the waiver of member dues to the Democratic State Central Committee;
- 6) Documents constituting or related to the waiver of any registration fees for the 2017 California Democratic Party Convention;

¹ These documents were also requested in a letter to Stephen Kaufman dated May 30, 2017. However, no response to the letter has been provided and/or production of documents requested therein.

- 7) Documents constituting or related to registration of attendees for the 2017 California Democratic Party Convention;
- 8) Documents defining registration requirements for the 2017 California Democratic Party Convention;
- 9) Documents related to credentialing and credential retrieval at the 2017 California Democratic Party Convention;
- 10) Documents related to the policies and practices in connection with the issuance and collection of ballots at the 2017 California Democratic Party Convention;
- 11) Ballots collected at the 2017 California Democratic Party Convention;
- 12) The final report issued by the Credentials Committee at the 2017 California Democratic Party Convention;
- 13) Notices of intent-to-run for California Democratic Party Chair in the 2017 election filed with the Secretary of the Party;
- 14) Documents constituting or relating to nominations for California Democratic Party Chair in the 2017 election;
- 15) Documents constituting or relating to acceptances of nominations for California Democratic Party Chair in the 2017 election;
- 16) Documents constituting or relating to ballot counting;
- 17) Party registrations of all proxy holders appearing at the 2017 California Democratic Party Convention;
- 18) Documents identifying any County Central Committee members represented by proxy holders at the 2017 California Democratic Party Convention;
- 19) Documents identifying any Assembly District Election Meeting members represented by proxy holders at the 2017 California Democratic Party Convention;
- 20) Documents identifying the residential districts of any County Central Committee members represented by proxy holders at the 2017 California Democratic Party Convention;
- 21) Signed proxies used for admittance to the 2017 California Democratic Party Convention;
- 22) Documents indicating the filing times of all proxies used for admittance to the 2017 California Democratic Party Convention;
- 23) Documents related to any revocation or change of proxies used for admittance to the 2017 California Democratic Party Convention;
- 24) All sign in sheets for participants to the 2017 California Democratic Party Convention;
- 25) The Credential Committee Final Report;
- 26) The official voting list of delegates;
- 27) The on-site sign in sheets; and
- 28) The agendaized Credential Report.

We were told via email on June 2, 2017 that “there is no review scheduled for Monday, June 5 – or any other time for that matter.” Therefore, we request immediately that: (1) the above-referenced materials be produced in order to complete our review; and (2) we be allowed to continue our review.

In addition to the above referenced issues, we ask that your committee address the following issues. First, the Kaufman Legal Group is representing the CDP and simultaneously representing Eric Bauman in his individual capacity. This represents a clear conflict of interest. *See* California Rules of Professional Conduct Rule 3-310 (Rule entitled “Avoiding the Representation of Adverse Interests”). If the CDP has signed a conflict waiver we ask that such waiver be produced and the individuals who approved such waiver be identified. Second, various members of the Compliance Review Commission (“CRC”) have endorsed Eric Bauman and/or are involved in the issues related to my challenge due to their participation in the election process for the 2017 California Democratic Party Convention. Therefore, we reiterate our request that a neutral third party perform an audit of the election results.

We request an opportunity to meet and confer with the CRC in connection with this letter as soon as possible. If you have any questions, comments, and/or concerns regarding this notice please contact my campaign representative (Joe Macaluso) at (415) 608-8448. Thank you for your time and consideration in this matter.

Sincerely,

/s/ Kimberly Ellis

Kimberly Ellis

Cc:

Eric Bauman

Alex Gallardo-Rooker

Daraka Larimore Hall

Jenny Bach

Dan Weitzman

Chris Myers

Garry Shay

Steve Kaufman

Coby King

Michael Wagaman