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Attorneys for Petitioners
LEANNA LOUIE and LEANNA LOUIE
FOR D4 SUPERVISOR 2022

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

LEANNA LOUIE AND LEANNA LOUIE FOR
D4 SUPERVISOR 2022,

Petitioners,

vs.

JOHN ARNTZ, Director of the San Francisco
Department of Elections; CITY AND COUNTY
OF SAN FRANCISCO; and DOES 1-10,

Respondents.

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

08/29/2022
Clerk of the Court
BY: KAREN VALDES
Deputy Clerk

CPF-22-517855

Case No.
[Unlimited Jurisdiction]

**VERIFIED PETITION FOR
WRIT OF MANDATE
REINSTATING LEANNA
LOUIE ON THE NOVEMBER
2022 BALLOT**

**(California Elections Code section
13314; California Code of Civil
Procedure sections 1085 et seq.)**

**CALENDAR PREFERENCE
REQUIRED BY STATUTE
(ELEC. CODE § 13314(a)(3))**

INTRODUCTION

1. Petitioners/Plaintiffs LEANNA LOUIE and LEANNA LOUIE FOR D4 SUPERVISOR (collectively, "Petitioners") bring this action to challenge Director of Department of Elections John Arntz's unlawful action of removing LEANNA LOUIE from the November 8, 2022 consolidated General Election Ballot, despite the fact that LEANNA LOUIE had been certified by the Department of Elections as a proper candidate on June 3, 2022 by the Department of Elections ("DOE") for the City and County of San Francisco (the "City" or "San Francisco").

2. Petitioners assert the actions of the Director were invalid and that he has a ministerial duty to place Leanna Louie's name on the November 2022 Ballot. The removal of Leanna Louie from the Ballot was illegal.

3. The City skipped indispensable procedures for removing Leanna Louie from the ballot and failed to timely remove her by the mandatory removal date of June 27, 2022. Director John Arntz's action of removing Leanna Louie from the ballot has no force and effect.

4. Additionally, the absence of Leanna Louie from the ballot denies thousands of voters and supporters the opportunity to vote for her in the November 2022 elections and her rights have been violated as she has been alienated from the ballot.

5. It is especially important to avoid voter confusion and Leanna Louie has been raising money, engaging in campaigning activities in detrimental reliance on the June 3, 2022 certification by the DOE.

6. Petitioners have no plain, speedy and adequate remedy at law to challenge the legality of Director Arntz's Action, and therefore bring this Verified Petition for Writ of Mandate and Complaint for Injunctive and Declaratory Relief ("Petition").

PARTIES

7. Petitioner/Plaintiff LEANNA LOUIE is a resident, duly registered voter, and taxpayer in the City and County of San Francisco.

8. Petitioner/Plaintiff LEANNA LUIE FOR D4 SUPERVISOR ("LLFORD4") is a registered FPPC approved campaign.

9. Respondent/Defendant JOHN ARNTZ ("Arntz") is San Francisco's Director of Elections. As such, he is the official responsible for printing the voter information pamphlets and ballots that will be distributed to the voters and which will contain an invalid ballot measure unless this Court intervenes to protect the voters. Petitioners are required to name Arntz as a Respondent, and Arntz is sued herein in his official capacity only.

10. Respondent/Defendant CITY AND COUNTY OF SAN FRANCISCO is a municipal government governed by the laws of the State of California, and the City and County of San Francisco Charter ("San Francisco Charter") and laws of the San Francisco.

11. The true identities and capacities of Respondent Does 1 through 10 are unknown to Petitioners at this time. Petitioners are informed and believe, and based upon such information and belief allege, that each of the fictitiously named respondents is in some manner responsible for the actions described in this Petition. When the true identities and capacities of these respondents have been determined, Petitioners will seek leave to amend this Petition to insert such identities and capacities.

VENUE

12. Venue for this action lies within the City and County of San Francisco pursuant to Code of Civil Procedure sections 393(b) and 394.

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1 removal of Leanna Louie's name from the ballot as necessary and appropriate to determine the
2 respective rights and duties of the parties;

3 5. For costs of this proceeding; and

4 6. For such other and further relief as this Court may deem just and proper.
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7 Dated: August 29, 2022

Respectfully submitted,

STANLEY SHEN

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10 By _____

11 CHRISTINE A. LINNENBACH
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13 By /s/ Christine A. Linnenbach
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Executed on 8/29/2022 in San Francisco, California.

Leanna Louie
Leanna Louie for D4 Supervisor 2022