MAYAL, HURLEY PC
Vladimir F. Kozina [redacted]
A Professional Corporation
[redacted]

Attorney for Plaintiff
AMERICAN CENTER FOR LAW AND JUSTICE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

AMERICAN CENTER FOR LAW AND JUSTIC **PLAINTIFF** **VS** **DEPARTMENT OF JUSTICE, STATE OF CALIFORNIA** **DEFENDANT**	**CASE NO.:** **COMPLAINT FOR INJUNCTIVE RELIEF** **GOVERNMENT CODE §7923.000**

Introduction

1. This is a lawsuit seeking to enforce the right to inspect and copy public records pursuant to the California Public Records Act ("CPRA"), Cal. Gov't Code § 7920.00 *et seq*. Plaintiff, American Center for Law Justice ("ACLJ"), a non-profit organization, requested public records from Defendant California Department of Justice ("Defendant DOJ"), relevant to the State's voter registration programs and activities. Disclosure of the requested records is of vital importance and of great interest to the public, as there have been examples of voter fraud through the State of California regarding non-citizens voting.

2. Through its reporting, the ACLJ seeks to apprise the public about whether California is facilitating illegal voting. Unfortunately, Defendant DOJ has met the ACLJ's records request with delay and lack of responsiveness. Defendant DOJ has not supported its delays or failure to produce with legal justification under CPRA. It continues to delay even after

Mayall Hurley P C
112 S. Church Street
Lodi, Ca 95207
(209) 477-3833

the ACLJ attempts to follow up on the request. This Court's intervention, and the sanction of an award of attorney fees and costs, are consequently required.

JURISDICTION AND VENUE

3. This Court has jurisdiction over this matter pursuant to Cal. Gov't Code § 7923.100 because the public records are located within the county.

PARTIES

4. Plaintiff American Center for Law and Justice is a non-profit organization dedicated to the defense of constitutional liberties secured by law.

5. Defendant DOJ is a public agency for the purposes of CPRA, under Cal. Gov't Code § 7920.525(a).

6. Defendant DOJ is located at 1300 "I" Street, Sacramento, CA 95814-2919 which is located in Sacramento County, California, and is subject to service of process in Sacramento County.

STANDING

7. Pursuant to Cal. Gov't Code § 7920.520 "every person" has a right to inspect any public record unless there is some basis under the CPRA for those records to be private. Moreover § 7923.000 allows for anyone to institute a proceeding for injunctive or declaratory relief in any court of competent jurisdiction in order to inspect or receive public records.

FACTUAL ALLEGATIONS

8. Defendant DOJ is an agency as defined by the CPRA, and as such is governed by the disclosure requirements of the CPRA, Cal. Gov't Code § 7920 *et seq*.

9. On July 15, 2026 Plaintiff ACLJ submitted a written CPRA request to Defendant DOJ seeking disclosure of public records. *See* Pl.'s CPRA Request to California (July, 15, 2026) Ex. A (Hereinafter CPRA Request).

Mayall Hurley P C
112 S. Church Street
Lodi, Ca 95207
(209) 477-3833

10. On July 27, 2026, Defendant DOJ responded to the request, *see* Def's Response Letter DOJ No. 26-1715, extending the deadline until August 10, 2026 pursuant to Cal. Gov't Code §7922.535. *See* Def's Response Letter, Ex. B.

11. On August 10, 2026, Defendant DOJ failed to produce to Plaintiff ACLJ the promised and requested records.

12. As of the date of filing, Defendant DOJ has still failed to produce to Plaintiff ACLJ the requested records.

13. Defendant DOJ did not meet the showing required under Cal. Gov't Code § 7922.000. Which requires that any withheld record be supported under express provisions of the CPRA, or that the public interest in disclosing the records is clearly outweighed by the public interest in not disclosing the records. Cal. Gov't Code § 7922.000

FIRST CAUSE OF ACTION

(Injunctive Relief)

14. The Cal Public Records Act states that "[p]ublic records are open to inspection at all times… and every person has a right to inspect any public record . . . ." Cal. Gov't Code § 7922.525. Additionally, "[a]ny person may institute a proceeding for injunctive or declarative relief. . . in any court of competent jurisdiction, to enforce that person's right. . . to inspect or receive a copy of any public record or class of public records." Cal. Gov't Code § 7923.100.

15. Whenever it appears that records are being improperly withheld from a member of the public, the court shall order the person charged with withholding records to disclose those records, or show cause why that person should not do so. Cal. Gov't Code § 7923.100.

16. In order to justify withholding any record, an agency must demonstrate that the record in question is exempted from disclosure by an express provision or the CPRA or that the public interest would be better served by not disclosing the records than by disclosing them. Cal. Gov't Code § 7922.000.

Mayall Hurley P C
112 S. Church Street
Lodi, Ca 95207
(209) 477-3833

17. Defendant has not provided any legitimate reasons for withholding the records under CPRA. Defendant DOJ has failed in its affirmative duty to provide practical assistance in overcoming a basis for denying records or information sought. *See* Cal. Gov't Code § 7922.600(a)(3); *Garcia v. Bellflower Unified Sch. Dist. Governing Bd.*, 220 Cal. App. 4th 1058, 1064-65 (Cal. App. 2 Dist., 2013).

18. Defendant DOJ has insufficiently responded to Plaintiff ACLJ's request for records under CPRA. Cal. Gov't Code 7922 *et seq*.

19. Consequently, Defendant DOJ has failed to promptly respond to Plaintiff ACLJ's request for records under CPRA. Cal. Gov't Code 7922 et seq.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for this Court to:

1. Assume jurisdiction over this action;

2. Enter an injunction directing Defendant DOJ to furnish, Plaintiff with all requested records;

3. Enter an injunction directing that, Defendant DOJ must waive all fees associated with Plaintiff's requests;

4. Award Plaintiff reasonable attorney's fees and costs, as authorized by Cal. Gov't Code § 7923.115.

5. Grant Plaintiff all further relief to which Plaintiff may be entitled.

Dated: November 2, 2026

Mayall Hurley P.C.

By _____
Vladimir F. Kozina
Attorneys for
American Center for Law and Justice

Mayall Hurley P C
112 S. Church Street
Lodi, Ca 95207
(209) 477-3833

Exhibit A

AMERICAN CENTER
for LAW & JUSTICE

July 15, 2026

California Dept. of Justice
Public Records Coordinator
P.O. Box 944255
Sacramento, CA 94244-2500
PublicRecords@doj.ca.gov

RE: CPRA Request to examine California Department of Justice records regarding voter registration

Dear Public Records Coordinator:

Under the California Public Records Act**,** pursuant to Code Section 7920, *et seq.* ("CPRA"), the American Center for Law and Justice (ACLJ)[1] requests certain records regarding voter registration.

For purposes of this Request, and unless otherwise indicated, the timeframe of records requested herein is November 4, 2024, through the date of receipt of this Request. All terms used herein have the definitions given by the CPRA.

The ACLJ requests copies of the following records be provided via email:

1. All records containing or addressing programs and activities conducted to ensure the accuracy and currency of official lists of eligible voters.

2. All records containing or addressing policies for handling investigative referrals for illegal voting.

3. All records containing the outcomes of or determinations regarding referrals for illegal voting, excluding the personal identifiers of private individuals investigated.

Conclusion

[1] The ACLJ is a not-for-profit 501(c)(3) organization dedicated to the defense of constitutional liberties secured by law. The ACLJ regularly monitors governmental activity concerning abortion and works to inform the public of such affairs. The ACLJ and its global affiliated organizations are committed to ensuring governmental accountability and the ongoing viability of freedom and liberty in the United States and around the world.

If this Request is denied in whole or in part, ACLJ requests that, within the time requirements imposed by CPRA, the custodian agency support all denials by reference to specific CPRA exemptions and provide any statutorily or judicially required explanatory information.

If there are any fees for searching or copying these records, please inform the ACLJ if the cost will exceed $500. However, the ACLJ respectfully requests a waiver of all fees because the disclosure of the requested information is in the public interest. The ACLJ will disseminate the records requested to the public via multiple media platforms and, as such, the records are requested for news gathering purposes. This information is not being sought for commercial purposes.

Thank you for your prompt consideration of this Request. Please furnish all applicable records and direct any responses to:

Jordan Sekulow, Executive Director
Benjamin P. Sisney
John A. Monaghan
American Center for Law and Justice
[redacted]

I affirm that the foregoing request and attached documentation are true and correct to the best of my knowledge and belief.

Respectfully submitted,

AMERICAN CENTER FOR LAW AND JUSTICE

Jordan Sekulow
Executive Director

Benjamin P. Sisney
Senior Litigation Counsel

John A. Monaghan
Senior Litigation Counsel

Exhibit B

CALIFORNIA
DEPARTMENT OF JUSTICE

Rob Bonta
Attorney General

600 WEST BROADWAY, SUITE 1800
SAN DIEGO, CA 92101
Public: (916) 210-6183
Email: Liberty.Sacker@doj.ca.gov

July 27, 2026

Sent via Email

John A. Monaghan
jmonaghan@aclj.org

RE: Public Records Act Request; DOJ No. 26-1715

Dear John Monaghan:

On July 16, 2026, the California Department of Justice (DOJ) received your request for records under the California Public Records Act (PRA) as set forth in Government Code section 7920.000 et seq. You requested the following:

> *[T]he American Center for Law and Justice (ACLJ) requests certain records regarding voter registration.*
>
> *For purposes of this Request, and unless otherwise indicated, the timeframe of records requested herein is November 4, 2024, through the date of receipt of this Request. All terms used herein have the definitions given by the CPRA.*
> *The ACLJ requests copies of the following records be provided via email:*
>
> 1. *All records containing or addressing programs and activities conducted to ensure the accuracy and currency of official lists of eligible voters.*
>
> 2. *All records containing or addressing policies for handling investigative referrals for illegal voting.*
>
> 3. *All records containing the outcomes of or determinations regarding referrals for illegal voting, excluding the personal identifiers of private individuals investigated.*

/ / /

For the reasons set forth below, DOJ is extending the date for responding to your records request to August 10, 2026. Agencies are permitted to extend the date for responding to a public records request for 14 days beyond the original 10-day deadline under specified circumstances. (Gov. Code, § 7922.535.) Your request was received by this office on July 16, 2026, and the initial deadline of our response therefore is July 27, 2026 as the 10th day falls on a Sunday. Fourteen days beyond this date is August 10, 2026. Agencies may take an extension for several reasons, which may be summarized as follows:

- The need to search for and collect records from field offices or other facilities that are separate from the office processing the request.

- The need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records which are demanded in a single request.

- The need for consultation, which shall be conducted with all practicable speed, with another agency having a substantial interest in the determination of the request or among two or more components of the agency having substantial subject matter interest therein.

(Gov. Code, § 7922.535, subds. (b) and (c).)

In this instance, an extension is needed to consult among multiple components of the agency to determine whether DOJ has records that are responsive to your request. We will provide a further response on or before August 10, 2026.

Sincerely,

/s/ Liberty M. Sacker

LIBERTY M. SACKER
Deputy Attorney General

For ROB BONTA
Attorney General