

April 10, 2020

**VIA E-MAIL & U.S. MAIL**

Melinda Dubroff  
Registrar of Voters  
San Joaquin County  
44 North San Joaquin Street  
Third Floor, Suite 350  
Stockton, CA 95202  
E-mail:  
mdubroff@sjgov.org; registrar@sjgov.org

**Re: Request for Recount – California State Assembly District 13  
Primary Election**

Dear Ms. Dubroff:

As a registered voter in San Joaquin County and candidate for State Assembly, I am writing to request a recount pursuant to my rights under Elections Code section 15620 of all votes cast for candidates for the office of California State Assemblymember District 13 in the March 3, 2020 Primary Election. I am requesting the recount on behalf of myself, a candidate in that election.

First, pursuant to Elections Code section 15630, I am asking to review all voted ballots that were not counted in the official canvass, including unopened and rejected vote-by-mail (“VBM”) ballot envelopes and provisional ballot envelopes, and any relevant information related to those ballots, including, but not limited to, all precinct rosters and any other materials related to the uncounted or rejected ballots. I am also asking to review all partially counted provisional ballots that were cast countywide, and all duplicated ballots in the 13th Assembly District, along with the originally voted ballots from which the duplicated ballots were remade.

Second, subsequent to the above review, I am requesting a hand recount of all precinct, provisional, and vote by mail ballots in this race pursuant to Elections Code section 15622, beginning with the order of precincts that is attached to this letter. I am requesting that the manual recount proceed by utilizing 1 recount board per day.

To the extent that any uncounted ballots subject to challenge/examination during the recount are ultimately validated, such ballots should be added to the count in accordance with 2 C.C.R. § 20823(a)(2). During the course of the recount and in accordance with 2 C.C.R. § 20813, I reserve the right to examine any other “relevant material,” as that term is defined in 2 C.C.R. § 20811(f), related to ballots cast in the election for this office.

I will await further word from you regarding the date of the commencement of the recount and the deposit that will be required to commence the recount. I understand that payment for the costs of the recount may be made by cash, cashier check, money order, or credit/debit card.

Please direct any communications to my attorneys Gary S. Winuk at (916) 452-6568 or E-mail [gwinuk@kaufmanlegalgroup.com](mailto:gwinuk@kaufmanlegalgroup.com); and George M. Yin at (213) 452-6565 or [gyin@kaufmanlegalgroup.com](mailto:gyin@kaufmanlegalgroup.com).

Thank you for your immediate attention to this matter.

Very truly yours,

A large black rectangular redaction box covers the signature area. There are faint blue scribbles or marks above and below the box.

Christina Fugazi

cc: Erin H. Sakata, Deputy County Counsel, [esakata@sjgov.org](mailto:esakata@sjgov.org)

ORDER OF INITIAL PRECINCTS TO BE COUNTED

11114
11151
11115
11108
91111
91113
11309
11117
11118
11101
33509
33520
33514
11306
33501
33546
33530
11217
11303
33503

