



San Diego County
Local Agency Formation Commission
 Regional Service Planning | Subdivision of the State of California

May 2, 2025

Delivered by Electronic Mail:

Honorable Mayor Todd Gloria
 City of San Diego
 202 C Street, 11th Floor
 San Diego, California 92101
 c/o Walt Bishop, Government Affairs
wbishop@sandiego.gov

**SUBJECT: Response to City of San Diego’s Letter of Objection |
 Certificate of Sufficiency for the Proposed Special Reorganization to
 Incorporate the City of La Jolla (File No. SRO24-15)**

Honorable Mayor Gloria:

Thank you for your letter dated April 30th regarding my prior action to issue a Certificate of Sufficiency for the above-referenced proposal on file with the San Diego County Local Agency Formation Commission (LAFCO). I understand your interest in what is, by all measures, an uncommon and complex proposal under LAFCO statute – one involving the detachment of a substantial portion of the City of San Diego. Nonetheless, and as detailed below, I want to assure you that the concerns outlined in your letter are readily addressable within the framework of LAFCO statute.

With this context in mind, the following responses correspond to the comments raised in sequence within your April 30th letter.

- With respect to Background Facts, the summarization states “LAFCO overruled the ROV’s rejection on 239 signatories” (paragraph three, page two). This characterization - which is repeated within the letter - is inaccurate and appears to reflect a misunderstanding of the distinct responsibilities assigned to the ROV and LAFCO in reviewing voter petitions for jurisdictional changes. A proper application of these statutory distinctions makes clear LAFCO did not overrule the ROV; rather, it followed sequenced procedures and exercised

Administration Keene Simonds, Executive Officer 2550 Fifth Avenue, Suite 725 San Diego, California 92103 T 619.321.3380 E lafco@sdcountry.ca.gov www.sdlafco.org	Joel Anderson County of San Diego Jim Desmond County of San Diego Vacant, Alt. County of San Diego	Kristi Becker City of Solana Beach Dane White City of Escondido John McCann Alt. City of Chula Vista	Chair Stephen Whitburn City of San Diego Marni von Wilpert, Alt. City of San Diego	Vice Chair Barry Willis Alpine Fire Protection Jo MacKenzie Vista Irrigation David Drake, Alt. Rincon del Diablo	Vacant General Public Brigette Browning, Alt. General Public
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lawful discretion expressly delegated by the Legislature. Specifically, as outlined in Government Code Section 56707, LAFCO initially requested the ROV to the review of the petition to establish both the number of valid signatures required to meet the 25% threshold of registered voters in the affected territory and the number of qualified signatures submitted. However, Government Code Section 56706 clearly assigns to the LAFCO Executive Officer the sole authority to determine the petition's overall validity – including whether to issue a Certificate of Sufficiency or Insufficiency. In this case, the decision to issue a Certificate of Sufficiency on April 29th followed the proponents lawful exercise of their right to challenge 240 signatories that had been initially disqualified by the ROV for reasons *other* than having a matching signature on file (emphasis).¹ Upon review, and as further detailed, those contested signatories were validated under the Executive Officer's assigned responsibility and based on the criteria established in Government Code Section 56704(b), which states:

"If a petition is signed by registered voters, each person signing the petition shall, in addition to his or her signature, affix the date upon which he or she signs the petition and indicate on the petition his or her place of residence, giving street and number or other designation sufficient to enable the place of residence to be readily ascertained."

- With respect to City Objections, the letter outlines three reasons to dispute the decision to issue the proponents a Certificate of Sufficiency.

The first dispute is outlined at the bottom of page two and asserts the LAFCO Executive Officer lacks authority to conduct a secondary review of signatures once they have been reviewed by the ROV. This assertion is incorrect. As explained in the preceding section, the Executive Officer is explicitly assigned statutory responsibility to review and validate voter petitions for jurisdictional changes. This responsibility necessarily includes the authority to consider proponents' challenges to the ROV's initial review. Notably, this conclusion aligns with the ROV's own guidance, which directed proponents to coordinate with LAFCO to contest any disqualified signatories.²

The second dispute is outlined near the top of page three and asserts that, even if LAFCO has the authority to conduct a secondary review of contested signatories, it cannot deviate from the ROV's determinations regarding incorrect or illegible printed names. This assertion overreaches the statute and raises important concerns regarding voter enfranchisement. As noted in your letter, LAFCO appropriately relies on the criteria established by the Legislature in Government Code Section 56704(b), which focuses on whether a signatory's place of residence can be "readily ascertained." Because the ability to

¹ All 240 petition signatories reviewed and ultimately resurrected as valid by LAFCO staff involve signatures accepted by the ROV.

² Reference to March 13, 2025 email communication between LAFCO and ROV staff.

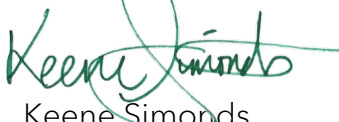
determine a signatory's residence is inherently connected to identifying their name, it is both reasonable and consistent with legislative intent for LAFCO to take an inclusive approach and consider proponents' challenges involving illegible or non-matching printed names – particularly when the accompanying signatures have been validated by the ROV. This approach helps ensure that voters' intentions to support a petition are honored, even when handwriting or spelling may be imperfect but nonetheless reasonably ascertainable.³

The third dispute is outlined at the bottom of page three and asserts that LAFCO exercised excessive – characterized as “arbitrary” and “capricious” – discretion in considering proponents' challenges to the ROV's review. This assertion appears misaligned with the examples cited and, more broadly, raises concerns related to voter enfranchisement. Specifically, the letter references two instances in which LAFCO staff noted a signer's primary language or cultural background may have contributed to misspellings or legibility issues when evaluating proponent challenges. However, these references omit the context in which these comments were made – namely, in response to objections raised by City representatives who argued voters should be able to correctly and legibly spell their full addresses, despite the local dynamic where street names often transition between English and Spanish. Considering longstanding efforts at the local, state, and federal levels to promote voter engagement and prioritize inclusion over exclusion, LAFCO acted well within its discretion in accepting challenges involving minor misspellings of street names. This exercise of discretion is especially important to ensure factors such as age, ability, race, and education do not create undue barriers to civic participation – particularly in processes directly tied to voter expression.

- With respect to Other Irregularities, the letter lists several “unanswered questions” starting at the bottom of page four. These questions are copied with staff responses and provided as Appendix A.

I appreciate this opportunity to respond to your comments and extend my availability to you to discuss the topic in further detail at your convenience. I also continue to appreciate the members of your administration – and specifically Walt Bishop and Dion Akers – for their courteous and responsive assistance on this and all other matters.

With appreciation,



Keene Simonds
Executive Officer

³ All reviews performed by LAFCO included no less than two staff members in considering proponent challenges. Any validations made by LAFCO required all staff members to agree.

San Diego LAFCO

May 2, 2025

Honorable Mayor Todd Gloria of the City of San Diego

Response to April 30th Letter Regarding Certificate of Sufficiency for La Jolla Special Reorganization

Appendices:

A) Responses to City Questions

Attachments:

- 1) Mayor's April 30th Letter to LAFCO
- 2) Email communication between LAFCO and ROV staff; appeal process
- 3) Email communication between LAFCO and ROV staff; petition instructions

cc: Chair Whitburn and Commissioners
Priscilla Mumpower, Assistant Executive Officer
Michaela Peters, Analyst II
Holly Whatley, Commission Counsel
Aleks Giragosian, Deputy Commission Counsel
Walt Bishop, Mayor's Office
Dion Akers, Mayor's Office
Trace Wilson, Proponent
Paula de Sousa, Proponent Counsel

Appendix A Responses to Other Questions

1. "Will the City be allowed to review the additional signatures that LAFCO resurrected-validated prior to its participation in the secondary review?"

The referenced validations involve 42 signatories who were otherwise accepted by the ROV except for omitting the city or ZIP code. LAFCO had previously instructed the ROV to accept signatories without this information, provided the remaining details—namely, the street number and street name—were sufficient to confirm residency within the affected boundary. Accordingly, since all other information was accepted by the ROV, these 42 signatories were promptly validated.

Commission Counsel has advised that only the petition proponents have the legal standing to request access to review petition signatory information

2. "Did LAFCO provide the ROV with any instructions specific to LAFCO's procedures when it delegated review of signatures? If so, what were those instructions?"

Yes, LAFCO provided written instructions to the ROV, including specific guidance on validating petition signatures in accordance with applicable Government Code provisions. These instructions addressed signer requirements, permissible corrections, and the method for calculating the required signature threshold based on voter registration data. Notably, the guidance included direction to apply Government Code Section 56704, which supports an inclusive approach by allowing addresses that include "street and number, or other designation sufficient to enable the place of residence to be readily ascertained." Copies of the instructions are attached for reference.

3. "Was LAFCO's secondary review limited to the Supplemental Petition or did it include the original Petition?"

Both.

4. "Where signers whose signatures were rejected on the original Petition allowed to sign a second time on the Supplemental Petition?"

Yes, however LAFCO provided the following instructions to the ROV to prevent duplications:

- If a signature was previously counted as valid, it should remain valid and not be duplicated (i.e., it would not count as two signatures).

- If a signature was previously counted as invalid but is now valid, it should be updated to reflect the new validation.

5. "Where all valid signatures reviewed to ensure there were no duplicates."

Yes.

6. "Who hired the consultant that prepared the spreadsheet LAFCO relied on?"

The proponents. Staff performed a sample query with the ROV to verify accuracy of the information provided.

7. "What was the source of information contained in the spreadsheet?"

Voter registration records from the County Registrar of Voters.

8. "In its review, did LAFCO compare the information on the petitions to the ROV's actual voter registration information?"

LAFCO relied on voter information collected from the ROV through the proponents' consultant, InField Strategies, with a sample query successfully conducted in coordination with the ROV to ensure accuracy.



THE CITY OF SAN DIEGO

TODD GLORIA
MAYOR

April 30, 2025

Mr. Keene Simonds
Executive Officer
San Diego County Local Agency Formation Commission
2550 Fifth Avenue, Suite 725
San Diego, CA 92103

Dear Mr. Simonds,

Please allow this to serve as the City of San Diego's formal Letter of Objection to the San Diego County Local Agency Formation Commission's Certificate of Sufficiency for Proposed Special Reorganization for Incorporation of the City of La Jolla petition regarding the Incorporation of Community of La Jolla and Concurrent Detachment from the City of San Diego.

BACKGROUND FACTS

The Association for the City of La Jolla (Proponents) submitted a petition regarding the Incorporation of Community of La Jolla and Concurrent Detachment from City of San Diego (Petition) purportedly containing 7,795 signatures of registered voters who reside within the proposed boundary. The San Diego County Local Agency Formation Commission (LAFCO) requested the Registrar of Voters (ROV) verify the submitted signatures. The ROV completed its review and determined that the Petition contained 5,723 valid signatures and was short 1,027 valid signatures to meet the required 25% threshold of 6,750.

On March 14, 2025, LAFCO issued a Notice of Insufficient Number of Valid Petition Signatures and Commencement of the 15-Day Remedy Period.¹ Under the applicable statutes, the Proponents were given an additional 15 days² to submit additional signatures. The Proponents submitted additional signatures in support of their Petition (Supplemental Petition).

The ROV reviewed the Supplemental Petition. On April 16, 2025, the ROV certified that of the 9,309 total signatures submitted, only 6,532 were found to be valid.³ Thus, the Proponents were short 218 valid signatures.

The Proponents requested to review the rejected signatures and contest those they believe the ROV improperly rejected. LAFCO then conducted a secondary review of the contested signatures. LAFCO overruled the ROV's rejection on 239 signatures. Of the 239 "resurrected" signatures, the City was allowed to review 212. The City agreed that of those it reviewed, 33 were valid signatures. The City objected to 179 of the signatures it reviewed.

On April 29, 2025, LAFCO issued a Notice of Sufficiency that the Proponents had met the 25% threshold, finding the number of valid signatures to be 6,722.

CITY'S OBJECTIONS

The City submits the following objections to LAFCO's issuance of the Notice of Sufficiency under Government Code section 56105:

- I. THERE IS NO STATUTORY AUTHORITY FOR LAFCO'S EXECUTIVE OFFICER TO CONDUCT A SECONDARY REVIEW OF PETITION SIGNATURES OR OVERRULE THE ROV'S DETERMINATION ONCE LAFCO DELEGATED THAT DUTY TO THE ROV.**

The City objects to LAFCO's secondary review of the signatures Proponents contested. Once LAFCO delegated the review of the Petition and Supplemental Petition to the ROV, the ROV was charged with determining whether the information and signatures on the Petition and Supplemental Petition matched voter registration records. The ROV oversees voter registration in the County and is the local subject matter expert in reviewing petitions such as this one. Here, the ROV reviewed both the Petition and Supplemental Petition and found them insufficient, with a shortfall of 218 valid signatures.

¹ See Attachment 1.

² Because the 15th day fell on a holiday, the Proponents actually had 16 days to collect and submit additional signatures.

³ See Attachment 2.

There is no authority permitting LAFCO or its Executive Officer to overturn the subject matter expert's determinations in this instance. Thus, LAFCO's Executive Officer should have issued a second Notice of Insufficiency following the ROV's review of the Supplemental Petition.

II. THERE IS NO STATUTORY AUTHORITY FOR LAFCO'S EXECUTIVE OFFICER TO OVERRULE THE ROV'S DETERMINATION REGARDING INCORRECT OR ILLEGIBLE NAMES.

To the extent that LAFCO contends that it had authority to conduct a secondary review of signatures, that review is limited to a review of whether the addresses of the signers was "readily ascertainable" (see Cal. Gov't Code section 56704(b)), and not to remedy errors in the signer's name as written on the Supplemental Petition. LAFCO appears to be relying on California Government Code section 56704(b) to grant it the authority to conduct the secondary review of the signatures rejected by the ROV. As stated above, the City does not agree with that position. However, if LAFCO did have authority to conduct a secondary review, that review was limited to whether, based on the information provided by signer on the petition, the signer's place of residence is "readily ascertainable." Government Code section 56704(b) does not authorize an analysis of whether a signer's name is "readily ascertainable" based on the information contained in the petition.

In its secondary review, in addition to reviewing contested signatures for errors in a signer's address, LAFCO also reviewed contested signatures to determine whether the signer's name was "readily ascertainable." The ROV rejected a number of the submitted signatures because of errors in a signer's name such that the name on the Supplemental Petition did not match the name in the voter registration record. Of the signatures it reviewed, the City objected to at least 27 of the resurrected signatures based on name alone, and at least 37 of the resurrected signatures based on errors contained in both the signer's name and address that did not match the voter registration record.⁴

III. LAFCO EXERCISED SIGNIFICANT DISCRETION IN OVERRULING THE ROV'S DETERMINATION AND WAS ARBITRARY AND CAPRICIOUS.

As the subject matter expert, the ROV follows a clear set of guidelines in determining if a signer's information and signature match the voter registration record. The ROV rejected 2,777 total signatures after examining

⁴ See Attachment 3 and 4. The City also objects to signatures based on errors in the signer's address that did not match the voter registration record.

both the Petition and Supplemental Petition. Of the total number of signatures rejected by the ROV, 2,072 were from the Petition and 705 were from the Supplemental Petition. LAFCO resurrected 239 of the rejections contested by the Proponents. The City only had an opportunity to review 212 of these contested signatures. The City agreed that of those it reviewed, 33 were valid signatures. The City objected to 179 of the signatures it reviewed on the basis of errors in the address, name, date, or other reason.

During the City's observation of the secondary review, LAFCO's representatives appeared to exercise significant discretion in favor of the Proponents, instead of deferring to the ROV's subject matter expertise. Indeed, at one point, LAFCO's representative stated that there was a need to exercise discretion in its review. LAFCO's representatives also speculated about whether a signer's primary language was English such that it might explain the errors on the Supplemental Petition. LAFCO's representatives also speculated about some signer's cultural heritage that could have caused the errors in the Supplemental Petition. LAFCO's representatives also resurrected signatures where the signer had a hyphenated last name, but included only one part of the last name on the Supplemental Petition such that it did not match the voter registration record. LAFCO's representatives also relied on Proponents' statements about what certain street signs said in determining whether an address was acceptable. At times, LAFCO's representatives also stated that they could understand why the ROV rejected the signature but decided to overrule the ROV's determination regardless.

Based on LAFCO's representatives' significant exercise of discretion, speculation as to causes of the errors, and reliance on information outside of the petition and voter registration records, including statements offered by the Proponents, LAFCO's determinations were arbitrary and capricious and the City objects to 179 of the resurrected signatures.

IV. OTHER IRREGULARITIES AND RESERVATION OF RIGHTS TO OBJECT.

The City has a number of unanswered questions related to this secondary review:

- Will the City be allowed to review the additional signatures that LAFCO resurrected prior to the City's participation in the secondary review?
- Did LAFCO provide the ROV with any instructions specific to LAFCO's procedures when it delegated review of signatures? If so, what were those instructions?

- Was LAFCO's secondary review limited to the Supplemental Petition or did it include the original Petition?
- Were signers whose signatures were rejected on the original Petition allowed to sign a second time on the Supplemental Petition?⁵
- Were all valid signatures reviewed to ensure there were no duplicates?⁶
- Who hired the consultant that prepared the spreadsheet LAFCO relied on?
- What was the source of information contained in the spreadsheet?
- In its review, did LAFCO compare the information on the petitions to the ROV's actual voter registration information?

Based on these lingering questions, the City objects to all resurrected signatures, except for 33, and reserves its right to raise additional bases for objections to the signatures it reviewed.

Sincerely,



TODD GLORIA
Mayor
City of San Diego

CC:

LAFCO Commissioners

- Chairman Stephen Whitburn
- Vice Chair Baron Willis
- Commissioner Jim Desmond
- Commissioner Joel Anderson
- Commissioner Kristi Becker
- Commissioner Dane White
- Commissioner Jo MacKenzie
- Commissioner Brigette Browning
- Commissioner David Drake
- Commissioner John McCann
- Commissioner Marni von Wilpert

⁵ During the City's review, Proponents made statements several times that some of the signers signed several times because their signatures had been previously rejected.

⁶ During the City's review, it noticed several duplicate names.

Attachment Two

From: [Simonds,Keene](#)
To: [Deanda, Javier](#)
Cc: [Diaz-Martinez, Connie](#); [Brom, Shawn](#); [Mumpower, Priscilla](#); [Paes, Cynthia L.](#); [Peters, Michaela A](#)
Subject: RE: CERTIFICATION LETTER – LAFCO Incorporation of La Jolla
Date: Friday, March 14, 2025 11:48:00 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

Got it; thank you Javier!

Priscilla will confirm shortly but I anticipate we will go over to ROV today and pick up the petitions and keep them at the LAFCO office.

Concurrently, we will provide the proponents a certificate of insufficiency today advising that they have come up short on the number of petitions needed. We will also provide notice that LAFCO will commence a 15-day window starting Monday, May 17th for the proponents to collect additional signatures for addendum review by the ROV... It appears the collection window and transfer back to LAFCO is the same and means by April 1st we will have another deliver for you and your team.

Thank you so much for all the assistance on this interesting project. More to come, Keene.

From: Deanda, Javier <Javier.Deanda@sdcounty.ca.gov>
Sent: Thursday, March 13, 2025 5:26 PM
To: Simonds,Keene <Keene.Simonds@sdcounty.ca.gov>
Cc: Diaz-Martinez, Connie <Connie.Diaz-Martinez@sdcounty.ca.gov>; Brom, Shawn <Shawn.Brom@sdcounty.ca.gov>; Mumpower, Priscilla <Priscilla.Mumpower@sdcounty.ca.gov>; Paes, Cynthia L. <Cynthia.Paes@sdcounty.ca.gov>
Subject: RE: CERTIFICATION LETTER – LAFCO Incorporation of La Jolla

Keene,

Attached is the breakdown of the signatures (Petition Statistics) and the definitions (Petition Challenge Description Table).

The LAFCO should make the arrangements with the proponents for reviewing the failed signatures. We will help explain our process and can go through some of those signatures with you and the proponents. We can do so here. The Failed Petitions Examination Guidelines for State-Wide petitions are also attached for reference.

I do not believe you can release the petition to proponents. California Code, Government Code 7924.110 (see attached) provides guidance as to ownership and privacy of petitions. As the Public Officer you must preserve the petition.

I hope this helps.

Sincerely,

Javier De Anda
Elections Manager – Registration/Petitions
County of San Diego, Registrar of Voters
858/505-7302
Fax 858/505-7294
www.sdvote.com



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From: Simonds,Keene <Keene.Simonds@sdcounty.ca.gov>
Sent: Thursday, March 13, 2025 5:01 PM
To: Deanda, Javier <Javier.Deanda@sdcounty.ca.gov>
Cc: Hamilton, Marilyn <Marilyn.Hamilton@sdcounty.ca.gov>; Lau, Liliana <Liliana.Lau@sdcounty.ca.gov>; Diaz-Martinez, Connie <Connie.Diaz-Martinez@sdcounty.ca.gov>; Brom, Shawn <Shawn.Brom@sdcounty.ca.gov>; Mumpower, Priscilla <Priscilla.Mumpower@sdcounty.ca.gov>

Subject: RE: CERTIFICATION LETTER – LAFCO Incorporation of La Jolla

Hi Javier –

Thank you.

I have a couple of questions when you get a chance that I anticipate the proponents will ask us...

Does the ROV provide a breakdown on the signatures in terms of which were validated, and which were not validated (and why...)?
What are the procedures if the proponents want to double check the process and/or challenge any of the signatures that have been not validated?
In terms of picking up the petitions, and to expedite the proponents' interest in reviewing them, can they be directly released by ROV to them?

Thank you! Keene.

Keene Simonds
Executive Officer

San Diego County
Local Agency Formation Commission (LAFCO)
Subdivision of the State of California | Regional Service Planning
2550 Fifth Avenue, Suite 725
San Diego, California 92103-6624

T 619-321-3380
E keene.simonds@sdcounty.ca.gov



From: Deanda, Javier <Javier.Deanda@sdcounty.ca.gov>
Sent: Thursday, March 13, 2025 1:08 PM
To: Simonds,Keene <Keene.Simonds@sdcounty.ca.gov>
Cc: Hamilton, Marilyn <Marilyn.Hamilton@sdcounty.ca.gov>; Lau, Liliana <Liliana.Lau@sdcounty.ca.gov>; Diaz-Martinez, Connie <Connie.Diaz-Martinez@sdcounty.ca.gov>; Brom, Shawn <Shawn.Brom@sdcounty.ca.gov>; Mumpower, Priscilla <Priscilla.Mumpower@sdcounty.ca.gov>
Subject: CERTIFICATION LETTER – LAFCO Incorporation of La Jolla

TO: KEENE SIMONDS, EXECUTIVE OFFICER, SAN DIEGO LAFCO
FROM: COUNTY OF SAN DIEGO, REGISTRAR OF VOTERS
SUBJECT: CERTIFICATION LETTER – Incorporation of Community of La Jolla and Concurrent Detachment from City of San Diego
DATE: MARCH 13, 2025

Please find attached a copy of the certification letter for the LAFCO petition regarding the Incorporation of Community of La Jolla and Concurrent Detachment from City of San Diego.

The original certification letter and petition are being held for pickup at our office at 5600 Overland Avenue, Suite 100, San Diego, CA 92123. Our operation hours are Monday – Friday 8:00am – 5:00pm.

For questions or information, please contact Connie Diaz-Martinez at (858) 505-7340 or Javier De Anda at (858) 505-7302.

Thank you.

Sincerely,

Javier De Anda
Elections Manager – Registration/Petitions
County of San Diego, Registrar of Voters
858/505-7302
Fax 858/505-7294
www.sdvote.com



Attachment Three

From: Mumpower, Priscilla <Priscilla.Mumpower@sdcounty.ca.gov>
Sent: Wednesday, April 2, 2025 1:33 PM
To: Peters, Michaela A <Michaela.Peters@sdcounty.ca.gov>; Deanda, Javier <Javier.Deanda@sdcounty.ca.gov>
Cc: Diaz-Martinez, Connie <Connie.Diaz-Martinez@sdcounty.ca.gov>; Velasquez, Aiden <Aiden.Velasquez@sdcounty.ca.gov>; Sellen, Erica A <Erica.Sellen@sdcounty.ca.gov>; Paes, Cynthia L. <Cynthia.Paes@sdcounty.ca.gov>; Brom, Shawn <Shawn.Brom@sdcounty.ca.gov>
Subject: RE: Scheduling Drop-Off for La Jolla Incorporation Petition Validation

Hi Javier,

We kindly request that the ROV validate the signatures in line with the instructions we provided earlier.

Regarding previously submitted signatures:

- If a signature was previously counted as valid, it should remain valid and not be duplicated (i.e., it would not count as two signatures).
- If a signature was previously counted as invalid but is now valid, it should be updated to reflect the new validation.

Please let me know if you have any questions.

Kind regards,

Priscilla

Priscilla Mumpower

Assistant Executive Officer

From: Mumpower, Priscilla <Priscilla.Mumpower@sdcounty.ca.gov>
Sent: Friday, February 7, 2025 10:18 AM
To: Deanda, Javier <Javier.Deanda@sdcounty.ca.gov>; Paes, Cynthia L. <Cynthia.Paes@sdcounty.ca.gov>; Brom, Shawn <Shawn.Brom@sdcounty.ca.gov>
Cc: Peters, Michaela A <Michaela.Peters@sdcounty.ca.gov>; Simonds, Keene <Keene.Simonds@sdcounty.ca.gov>; Diaz-Martinez, Connie <Connie.Diaz-Martinez@sdcounty.ca.gov>; Holly Whatley <hwhatley@chwlaw.us>; Aleks R. Giragosian <agiragosian@chwlaw.us>
Subject: RE: Scheduling Drop-Off for La Jolla Incorporation Petition Validation

Hello ROV team –

After reviewing your guidelines and aligning them with our policies and applicable government codes, we respectfully request your assistance in validating the registered voter petition submitted by the Association for the City of La Jolla. The petition circulated between May 31, 2024, and December 1, 2024, for registered voters on a special reorganization involving the incorporation of La Jolla and concurrent detachment from the City of San Diego. The petition and related application materials were formally submitted on January 29, 2025 and can be reviewed [here](#).

While we defer to the ROV's standard protocols in validating signatures, we would like to highlight the following specific instructions:

1. Petitioner Requirements

- Each person signing the petition shall, in addition to his or her signature, affix the date upon which he or she signs the petition and indicate on the petition his or her place of residence, giving street and number or other designation sufficient to enable the place of residence to be readily ascertained. (GCS 56704).
 - **NOTE:** If the YEAR is missing, it is acceptable, but the date must fall within the petition circulation window, which is from 5/31/2024 to 12/1/2024.

- **NOTE:** It is acceptable for the incorporation petition form to uniformly pre-print "La Jolla, CA 92037", as this is a fixed element. The variables—specifically the a) printed name, b) residence address (house number/street name), and c) signature—must be completed by the signatory. Any petition signatures where these variables are not completed by the signatory will be considered invalid, **except** in cases where Sharon Wampler (initials “SLW”) has used a red pen to add "La Jolla, CA 92037" and her initials for those who missed including this specific information. This latter instruction is limited to adding “La Jolla, CA 92037.” Any other corrections made by Sharon Wampler will invalidate the signature.

2. Threshold of Signatures

- The Executive Officer requests the Registrar of Voters to ascertain the following: (a) The number of registered voters in the affected territory. (b) The number of qualified signers appearing upon the petition. (GCS 56707).
- With respect to calculating the number of registered voters, and consistent with GCS 56375(f), the number of registered voters shall be calculated as of the time of the last report of voter registration by the county elections official to the Secretary of State prior to the date the first signature was affixed to the petition.
 - **NOTE:** The threshold for the incorporation of a city is signatures from at least 25% of the registered voters residing in the area to be incorporated (affected territory).
 - *We will provide a boundary map prior to drop-off for your use. Please let us know if you need a shapefile.*

If you need any clarification or have questions regarding these instructions, please feel free to contact me.

A few questions from LAFCO staff:

- We would appreciate your guidance in scheduling a suitable date and time to drop off the petition forms for validation.
- Could you let us know how many signatures are needed to meet the threshold?
- Additionally, could you provide an estimate of how long it may take to complete and deliver your findings?

Thank you for your continued assistance.

Best,

Priscilla

Priscilla Mumpower

Assistant Executive Officer

San Diego Local Agency Formation Commission (LAFCO)