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KINGS COUNTY ELECTIONS

December 13, 2022

VIA ELECTRONIC MAIL

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RE: Senate District 16 – Recount Request

Dear Registrars of Voters:

This letter is submitted on behalf of David Shepard, candidate for Senate District 16. In accordance with California Elections Code section 15620 and the Secretary of State's Recount Regulations, 2 CCR § 20810 *et seq.*, the undersigned, a voter, requests a recount of certain ballots and precincts contained in Senate District 16 as specified herein.

I request the inspection and recount proceed in the order identified below (Elec. Code § 15622):

- 1 TULARE COUNTY
- 2 KINGS COUNTY
- 3 KERN COUNTY
- 4 FRESNO COUNTY

A list is attached of the order of precincts within each county.

For each such county in the order specified, the following relevant materials:

- a. Uncounted (challenged or uncured) vote-by-mail ballots and ballot envelopes for the specified contest;
- b. Uncounted (challenged or uncured) provisional ballots and ballot envelopes for the specified contest;
- c. Uncounted (rejected) conditional ballots and ballot envelopes for the specified contest;
- d. Signature verification statements and unsigned ballot statements for uncounted (challenged or uncured) vote-by-mail, provisional, and conditional ballot envelopes;
- e. Over-voted ballots for the specified contest;
- f. Under-voted ballots for the specified contest;
- g. Rejected ballots that were received and voted at the precincts/vote centers within the jurisdiction;
- h. Counted (accepted) vote-by-mail ballots and ballot envelopes for the specified contest;
- i. Counted (accepted) provisional ballots and ballot envelopes for the specified contest; and
- j. Ballots received and voted (accepted) at the precincts/vote centers within the jurisdiction.

I further request the following method of recount (Elec. Code § 15627):

Manual inspection and counting of the following:

- a. Over-voted ballots for the specified contest;
- b. Under-voted ballots for the specified contest;
- c. Uncounted (challenged or uncured) vote-by-mail envelopes/ballots for the specified contest;
- d. Uncounted (challenged or uncured) provisional envelopes/ballots for the specified contest;
- e. Signature verification statements and unsigned ballot statements for uncounted (challenged or uncured) vote-by-mail, provisional, and conditional ballot envelopes; and
- f. Rejected ballots that were received and voted at the precincts/vote centers within the jurisdiction;

and

Machine inspection and counting of the following:

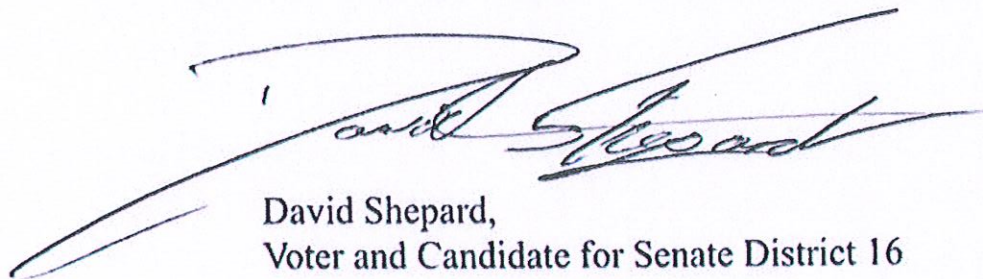
- a. Ballots received and voted (accepted) at the precincts/vote centers within the jurisdiction;
- b. Counted (accepted) vote-by-mail ballots for the specified contest;
- c. Counted (accepted) provisional ballots for the specified contest; and
- d. Counted (accepted) conditional ballots for the specified contest.

To the extent that the following material is not reviewed in the above request, I also request to review and inspect "relevant material," 2 CCR 20813, as follows:

- a. Under-voted ballots and over-voted ballots;
- b. Vote by mail, provisional, and conditional ballot envelopes;
- c. Voter registration files of vote-by-mail voters and provisional voters for voter authentication purposes (including registration card signatures);
- d. Rejected ballots that were received and voted at the precincts/vote centers within the jurisdiction;
- e. Audit logs;
- f. Polling place event logs;
- g. Precinct tally results;
- h. 1% manual tally results; and
- i. Central count tally results and consolidated results in a structured, non-proprietary format.

To discuss any issues related to this recount request, please contact my attorney, Brian Hildreth at (916) 442-7757 or bhildreth@bmhlaw.com. In particular, I request that you please notify Mr. Hildreth as soon as possible of the date and place for the recount. (Elec. Code § 15628.) And also that you please notify Mr. Hildreth as soon as possible of the daily cost of conducting the recount, and the manner of transmitting the deposit. (Elec. Code § 15624; 2 CCR §20815.) Thank you.

Respectfully submitted,



David Shepard,
Voter and Candidate for Senate District 16

ORDER OF PRECINCTS

1. TULARE		2. KINGS		3. KERN		4. FRESNO	
VotingPrecinct	Rank	VotingPrecinct	Rank	VotingPrecinct	Rank	VotingPrecinct	Rank
2990237	1	1202	1	7011938	1	0000059	1
4990023	2	1303	2	7012723	2	0000061	2
5990091	3	1506	3	7011703	3	0000057	3
4998006	4	1305	4	7012277	4	0000058	4
2990121	5	1309	5	7051732	5	0000093	5
4998001	6	1307	6	7010090	6	0000062	6
1990435	7	1501	7	7042389	7	0000091	7
2998004	8	1404	8	7032236	8	0000056	8
5990197	9	1105	9	7022013	9	0000092	9
5990012	10	1306	10	7021634	10	0000055	10
4990203	11	1102	11	7052633	11	0000090	11
1998017	12	1507	12	7032172	12	0000086	12
1990413	13	1405	13	7050551	13	0000054	13
1990172	14	1302	14	7021235	14	0000137	14
1990280	15	1502	15	7022792	15	0000111	15
1998012	16	1508	16	7011984	16		
4998012	17	1511	17	7021717	17		
1998021	18	1304	18	7041242	18		
1998013	19	1207	19	7022803	19		
1998004	20	1301	20	7052143	20		
1998014	21	1503	21	7052500	21		
1998005	22	1310	22	7022600	22		
1998016	23	1308	23	7030303	23		
1998020	24	1103	24	7011200	24		
2998001	25	1101	25	7012167	25		
1998002	26	1206	26	7032386	26		
5998001	27	1401	27	7011153	27		
1998015	28	1402	28	7022282	28		
1998003	29	1504	29	0013121	29		
5043009	30	1106	30	7043561	30		
5045001	31	1104	31	0030338	31		
5043001	32	1513	32	7040140	32		
5044001	33	1509	33	0043540	33		
5044008	34	1203	34	0020250	34		
5041024	35	1403	35	7051715	35		
5041006	36	1204	36	7011170	36		
5048003	37	1205	37	7013106	37		

1. TULARE		2. KINGS		3. KERN		4. FRESNO	
5048002	38	1201	38	0051227	38		
5048001	39			7051739	39		
2055001	40			0030322	40		
2052001	41			7051704	41		
2051005	42			0020243	42		
2053002	43			7051233	43		
2053008	44			7033226	44		
2058001	45			7013095	45		
2058003	46			7033232	46		
4014001	47			0051727	47		
4011001	48			7012414	48		
4012001	49			0030317	49		
4070001	50			7011171	50		
1065001	51			0030367	51		
1064001	52			0032170	52		
1065011	53			7051298	53		
4068001	54			0050751	54		
1080001	55			0030312	55		
1030001	56			0032380	56		
				0040448	57		
				0020249	58		
				0013110	59		
				7020285	60		
				0025299	61		
				0033150	62		
				0022035	63		
				0040411	64		
				7031211	65		
				0030339	66		
				0033161	67		
				0020265	68		
				0023239	69		
				0013100	70		