March 25, 2025

Honorable Chief Justice Patricia Guerrero
and Honorable Associate Justices
California Supreme Court
350 McAllister Street
San Francisco, CA 94102

Re: *Carlos "Lina" Santiago v. Orange County Superior Court*, No. S289675, Amici Curiae Letter in Support of Petition for Review, or in Alternative, Grant and Transfer

Dear Chief Justice Guerrero and Associate Justices:

The American Civil Liberties Union of Southern California, the American Civil Liberties Union of Northern California, the American Civil Liberties Union of San Diego and Imperial Counties, and the First Amendment Coalition urge this Court to grant review in *Carlos "Lina" Santiago v. Orange County Superior Court*, No. S289675, or in the alternative, issue an order granting and transferring the matter to the Court of Appeal for a written opinion after full briefing and argument.

This case presents issues of statewide concern that should be addressed by a reasoned decision that provides clear guidance to trial courts and prevents the chilling effect on protected speech caused by arrest and prosecution under an unconstitutional statute that has evaded appellate review for decades.

A decision from the Court of Appeal, if not this Court, is necessary to provide guidance to lower courts and litigants about two novel and critically important questions: 1) Whether the ban on "disturb[ing] or disquiet[ing] any assemblage of people met for religious worship by profane discourse" in Penal Code section 302(a) is a content- or viewpoint-based restriction on speech that is facially unconstitutional under the First Amendment and the Liberty of Speech Clause of the California Constitution; and 2) Whether the two other substantive restrictions in the same statute barring disturbance by "rude or indecent behavior" or by "any unnecessary noise" must be

subject to narrowing judicial construction to ensure they comport with the First Amendment. The answer to these questions is important to ensure the right to protest is protected while still ensuring the government's interest in protecting peoples' ability to attend houses of worship.

The need for review at this moment is especially clear for three reasons.

First, there is only one published appellate decision interpreting and applying Penal Code section 302, a 1972 decision of the superior court, appellate division in *People v. Cruz* (*Cruz*) (1972) 25 Cal.App.3d Supp.1. The *Cruz* opinion predates seminal United States Supreme Court First Amendment decisions explaining how to differentiate content-based restrictions on speech from content-neutral ones and setting forth the legal framework for determining the validity of content-based and content-neutral restrictions. (See *Reed v. Town of Gilbert (Reed)* (2015) 576 U.S. 155, 163-71 [clarifying how to distinguish content-based restrictions on speech from content-neutral ones]; *Ward v. Rock Against Racism* (*Ward*) (1989) 491 U.S. 781, 791 [discussing First Amendment test to evaluate content-neutral restrictions on speech in a public forum]; see also *Perry Educ. Ass'n v. Perry Local Educators' Ass'n* (1983) 460 U.S. 37, 45 [holding that content-based restrictions on speech in a public forum are subject to strict scrutiny]; *Center for Bio-Ethical Reform, Inc. v. Irvine Company LLC* (*Bio-Ethical Reform*) (2019) 37 Cal.App.5th 97, 105 [under the Liberty of Speech Clause, content-based restrictions are subject to strict scrutiny].)

Cruz was also decided before this Court's decision in *In Re Brown* (1973) 9 Cal.3d. 612, which held that the phrase "unusual noise" in Penal Code section 415(2) had to be interpreted narrowly to comport with the First Amendment. (9 Cal.3d at pp. 619-20). This Court's opinion in *Brown* is highly relevant to whether "unnecessary noise" in Penal Code section 302(a) must also be subject to a narrowing construction to protect First Amendment rights.

Second, there has been increased protest activity at houses of worship and increased governmental interest in regulating such

protests.[1] Nor is there any evidence that the statute has fallen into desuetude. Data compiled by Professor William A. Sundstrom of Santa Clara University in support of the Racial Justice Act of 2020, Assembly Bill No. 2542, Penal Code section 745, shows there were 100 arrests for alleged violations of Penal Code section 302 between 2010 and 2021.[2] Thus, there is a need for judicial guidance about how law enforcement agents and prosecutors can apply Penal Code section 302(a) consistent with the United States and California Constitutions – guidance that will also help legislative bodies regulate without infringing on constitutional rights.

Third, courts have long recognized that any realistic threat of criminal prosecution for activity that may be protected by the First Amendment can cause a chill on speech that infringes constitutional rights. (See, e.g., *Babbitt v. United Farm Workers Nat'l Union* (1979) 442 U.S. 289, 298-300). *A fortiori*, allowing a criminal prosecution *to continue* without addressing significant First Amendment issues with the statute under which Petitioner Santiago is being prosecuted creates a severe chilling effect. Thus, the Court should grant review or grant and transfer to ensure that Ms. Santiago does not continue to be prosecuted for allegedly violating either a provision that is facially unconstitutional under the First Amendment or provisions that must be narrowly construed to ensure that they comport with the First Amendment.

---

[1] See, e.g., Rebecca Ellis and David Zahniser, *'Bubble Zones' Proposed to Keep Back Protesters at Abortion Clinics and Synagogues in L.A.*, LA Times (Aug. 7, 2024) available at https://www.latimes.com/california/story/2024-08-07/bubble-zone-abortion-clinics-synagogues; Megan Kitt, *Protesters Flock Awaken Church's First Coronado Service*, The Coronado Times (Jan. 30, 2024) available at https://coronadotimes.com/news/2024/01/30/protesters-flock-awaken-church/; Jessica Flores, *S.F. Church, Threatened After Drag Events, Hit with Anti-LGBTQ Protest*, S.F. Chron (July 17, 2023) available at https://www.sfchronicle.com/bayarea/article/anti-lgbtq-protest-church-18203301.php.

[2] *Racial Justice Act Tool* available at https://rja.paperprisons.org/. Amici are aware of no data showing how often law enforcement officers successfully discouraged protestors from continuing to exercise their freedom of speech by threatening to arrest protestors under Penal Code section 302.

At a minimum, because the Court of Appeal summarily denied Ms. Santiago's[3] writ petition, this Court should grant the petition and transfer this case to the Court of Appeal for a written opinion, thereby ensuring that there is appellate authority interpreting Penal Code section 302(a) that takes into account the enormous evolution of First Amendment law since *Cruz* was decided.

I. Interests of Amici Curiae

The American Civil Liberties Union ("ACLU") is a nationwide, non-partisan, non-profit organization with approximately 1.1 million members and supporters dedicated to the principles of liberty and equality embodied in the federal and state constitutions. Since its founding in 1920, the ACLU has focused on protecting the free expression that is at the core of our constitutional democracy. (See, e.g., *United States v. Hansen* (2023) 599 U.S. 762; *Mahanoy Area School District v. B.L. ex rel. Levy* (2021) 594 U.S. 180; *Reno v. American Civil Liberties Union* (1997) 521 U.S. 844; *Brandenburg v. Ohio* (1969) 395 U.S. 444.)

The ACLU of Southern California, the ACLU of Northern California and the ACLU of San Diego and Imperial Counties (together, the "ACLU California Affiliates") are regional affiliates of the national ACLU. Each affiliate has frequently appeared in federal and state court on cases involving the constitutional guarantees of free expression protected by the First Amendment of the United States Constitution and the Liberty of Speech Clause of the California Constitution. (See, e.g., *Garnier v. O'Connor-Ratcliff* (9th Cir. 2022) 41 F.4th 1158 cert. granted Apr. 24, 2023, Case No. 22-324 [amicus in Supreme Court]; *Los Angeles Police Protective League v. City of Los Angeles*, Case No. S275272, review granted Aug. 17, 2022 [amicus in support of petition for review and in this Court]; *Fashion Valley Mall LLC v. NLRB* (2007) 42 Cal.4th 850 [amicus]; *Los Angeles Alliance for Survival v. Los Angeles* (2000) 22 Cal.4th 352 [plaintiff's counsel]; *People v. Peterson* (2023) 95 Cal.App.5th 1061 [amicus]. See also

---

[3] Although the complaint names "Carlos Santiago," the defendant has adopted by usage the name Lina Santiago. Thus, we use the name Lina Santiago or Ms. Santiago throughout this letter. (83 Ops. Cal. Atty Gen. 136 at *2 (2000) ["[A] common law change of name is valid in California."])

Phillips v. U.S. Customs & Border Protection (9th Cir. 2023) 74 F.4th 986 [plaintiffs' counsel]; *Koala v. Khosla* (9th Cir. 2019) 931 F.3d 887 [plaintiff's counsel]; *Black Lives Matter-Los Angeles v. Garcetti* (C.D. Cal., Case No. 20-cv-04940) [plaintiffs' counsel]).

The First Amendment Coalition ("FAC") is a nonprofit, nonpartisan organization dedicated to defending freedom of speech, freedom of the press, and the people's right to know. As direct counsel or amicus curiae, FAC has often appeared in this Court, California Courts of Appeal, the United States Supreme Court, or federal Courts of Appeal in defense of the constitutional right to freedom of expression. (See, e.g., *Porter v. Martinez* (9th Cir. 2023) 68 F.4th 429 [plaintiff's counsel]; *Golden Gate Land Holdings LLC v. Direct Action Everywhere* (2022) 81 Cal.App.5th 82 [amicus].)

This case has significant ramifications for free expression that reach far beyond the denial below of the motion brought pursuant to *People v. Noroff* (1967) 67 Cal.2d 791Given the ACLU California Affiliates' and FAC's long-standing commitment to the protection of free speech, the proper resolution of this case is of substantial interest to the ACLU, to FAC, and to their respective members. The ACLU California Affiliates and FAC also respectfully believe that their participation as amici curiae will assist the Court in resolving the present matter. Amici therefore request leave to file the accompanying proposed brief.

II. This Case Concerns Two Closely Related Important and Novel Questions Left Unanswered by the Court of Appeal's Summary Denial.

The Court of Appeal's summary denial did not address two closely related and important questions about which there are no published appellate decisions: is the ban on disrupting a religious assembly by "profane discourse" an impermissible content-based or viewpoint-based restriction that violates the First Amendment? The issues are novel, because there is only one appellate opinion addressing Penal Code section 302(a), *Cruz, supra*, and it did not address whether the profane discourse provision was content- or viewpoint-based. (*Id.* at p. 10 [declining to address constitutional

challenge to "profane discourse" because the criminal complaint did not allege a violation of that provision of the statute].) .[4]

Addressing these issues is important because there appears to be an uptick of protests near houses of worship including recent examples in the San Diego area, Los Angeles, and San Francisco (See footnote 1, *supra*). It is also important because, as discussed in section IV, *infra*, criminal prosecutions for activities that may well be protected by the First Amendment can have a significant chilling effect on speech thereby undermining First Amendment values.

The complaint against Ms. Santiago alleges that she violated Penal Code section 302(a) which provides:

> Every person who intentionally disturbs or disquiets any assemblage of people met for religious worship at a tax-exempt place of worship, by profane discourse, rude or indecent behavior, or by any unnecessary noise, either within the place where the meeting is held, or so near it as to disturb the order and solemnity of the meeting, is guilty of a misdemeanor . . . .

The complaint does not delineate which portion of the statute Ms. Santiago is alleged to have violated – rather it alleges that she violated all the portions of the statute. The complaint states that Ms. Santiago "did intentionally and unlawfully disturb and disquiet an assemblage of people met for religious worship at Oak House Church, a tax-exempt place of worship, by profane discourse, rude and indecent behavior, and by unnecessary noise." (Pet. for Writ of Mandate, Court of Appeal Case No. G065115, Exh. A).

The Court should, at a minimum, grant the petition to make clear that the prohibition on "profane discourse" is a content- or viewpoint-based restriction on speech that is facially unconstitutional under the First Amendment. "A speech regulation is content-based if the law applies to particular speech because of the topic discussed or the idea or message expressed." (*Reed*, *supra*, 576 U.S. at p. 171.) The

---

[4] Moreover, as stated above, the *Cruz* decision predates fundamental United States Supreme Court authority delineating whether a speech restriction is content- or viewpoint-based and the level of scrutiny applied to such restrictions.

same is true under the Liberty of Speech Clause. (*Bio-Ethical Reform*, *supra*, 37 Cal.App.5th at pp. 105-06.). Speech restrictions that are content-based *on their face* are "subject to strict scrutiny regardless of the government's benign motive, content-neutral justification, or lack of 'animus toward the ideas contained' in the regulated speech." (*Reed,* 576 US at p. 165 [citing *Cincinnati v. Discovery Network, Inc.* (1993) 507 U.S. 410, 429].)

The word profane is defined as "relating or devoted to that which is not sacred or biblical" and "not respectful of orthodox religious practice."[5] Prohibiting profane discourse near a church is a content-based restriction on its face because whether that portion of the statute prohibits particular speech turns on the content of that speech. (*Reed, supra*, 576 U.S. at p. 171). In other words, the profane discourse prohibition in Penal Code section 302(a) is content-based because it would not apply to a person standing near a church chanting "Jesus Saves" but would apply to a person standing in the same spot chanting "Jesus was a Con Man." (*Ibid.*; *Bio-Ethical Reform*, *supra*, 37 Cal.App.5th at p.106 [holding that restrictions against "grisly and gruesome" imagery are content-based under the Liberty of Speech Clause because "they draw the line between what is, and what is not allowed based on the content of what is depicted."].)

The fact that the statute prohibits profane discourse only in a specific location does not make it content-neutral and thus subject to a lower level of scrutiny. While the United States Supreme Court has held laws that restrict speech only in certain locations may be subject to intermediate scrutiny, that is the case only if they are content-neutral. (See, e.g., *Ward, supra,* 491 U.S. at p. 791); see also *Berger v. City of Seattle* (9th Cir. 2009) 569 F.3d 1039, 1051 [explaining that fact that ordinance restricts speech only in specific location does not make it content-neutral if restriction applies only to some speech based on its content]). Under the test set forth in *Reed*, the restriction on profane discourse is content-based on its face and thus subject to strict scrutiny even though it applies only in a particular location.

The profane discourse restriction is particularly pernicious because it is not only content-based, but also viewpoint-based. The provision does not bar any discussion of the subject of religious

---

[5] *Profane*, Google Online Dictionary from Oxford Languages available at bit.ly/4iEzS9N (last visited Mar. 19, 2025).

practices, only discussion that is not respectful of orthodox religious practice. Thus, it favors a particular viewpoint about a subject. Government discrimination among viewpoints is an even "more blatant and more egregious form of content discrimination." (See *Reed*, *supra*, 576 U.S. at p. 168.) As such, viewpoint-based speech restrictions are per se unconstitutional. (*Matal v. Tam* (2017) 582 U.S. 218, 243.) Indeed, courts see viewpoint-based restrictions on speech as so antithetical to the First Amendment that they are likely unconstitutional even within categories of speech that are considered unprotected by the First Amendment. (See *R.A.V. v. City of St. Paul* (1992) 505 U.S., 377, 384 ["Thus, the government may proscribe libel; but it may not make the further content discrimination of proscribing only libel critical of the government."]). Viewpoint-based speech restrictions are "poison to a free society." (*Iancu v. Brunetti* (2019) 588 U.S. 388, 399 [conc. opn. of Alito, J.].) They are therefore impermissible even in non-public fora, where speech restrictions are subject to relatively relaxed judicial scrutiny. (See, e.g., *Cornelius v. NAACP Legal Defense and Educ. Fund, Inc.* (1985) 473 U.S. 788, 800.)

But even if the Court concludes the restriction is content-based but not viewpoint-based, it is still subject to strict scrutiny. Strict scrutiny requires that the government "prove that the restriction furthers a compelling interest and is narrowly tailored to achieve that interest." (*Reed, supra,* 576 U.S. at p. 171.) To survive strict scrutiny, the government must "specifically identify an 'actual problem' in need of solving, and the curtailment of free speech must be actually necessary to the solution. That is a demanding standard." (*Brown v. Entm't Merchs. Ass'n* (2011) 564 U.S. 786, 799 [internal citations omitted]; *accord Bio-Ethical Reform*, *supra*, 37 Cal.App.5th at p. 399 [interpreting Liberty of Speech Clause and stating "[i]t is rare that a regulation restricting speech because of its content will ever be permissible."] [quoting *Brown*].)

It is self-evident that the only government interest this portion of the statute aims at is preventing people going to houses of worship from hearing speech they do not like or find offensive. That is the case because there are other obvious ways to protect against noise that is so loud that it makes holding a religious service difficult or impossible, blocking an entrance or exit to a house of worship, or physical assaults and harassment, which do not involve singling out speech of a particular content and viewpoint. Protecting people from speech they do not like is not a compelling interest; indeed it is inimical to the very

purposes of the First Amendment. (See, e.g., *Street v. New York*, (1969) 394 U.S. 576, 592 ["It is firmly settled that under our Constitution the public expression of ideas may not be prohibited merely because the ideas are themselves offensive to some of their hearers."]; *City of Fresno v. Press Communications, Inc.* (1994) 31 Cal.App.4th 32, 42 ["The possibility that speech may be 'undesirable' or 'unpopular' is not an acceptable basis for the government to curtail speech which is otherwise protected by the First Amendment."].)

While Ms. Santiago did not clearly raise the facial constitutionality of the profane discourse provision based on its being content-based in her Petition for Review, the Superior Court did address the issue below. (Pet. for Writ of Mandate, Court of Appeal Case No. G065115 Exh. D at p. 48 [Judge: "[B]ut the statute does not attempt to criminalize any particular kind of speech. Um, it rather, it attempts to criminalize the manner and intention with which any speech is made, any type of speech, *the statute is content neutral*."], italics added). Accordingly, this Court can address the issue of facial unconstitutionality on review. (See *Citizens United v. FEC* (2010) 558 U.S. 310, 330-31 ["[E]ven if a party could somehow waive a facial challenge while preserving an as-applied challenge, that would not prevent the Court from . . . addressing the facial validity of [the statute] in this case" because it has "been passed upon" in the trial court.].) However, if the Court believes the question of the facial validity of the "profane discourse" provision should be briefed and addressed in the Court of Appeal, it can grant the petition, transfer it to the Court of Appeal with direction to the Court to address both the facial and as applied challenges to Penal Code section 302(a) under both the First Amendment and the Liberty of Speech Clause, require briefing on those issues, and issue a written opinion. (See Cal. Rules of Court, rule 8.516(a)(1).)

III. Review Should be Granted to Provide Narrowing Constructions of Portions of the Statute to Ensure They are Consistent with the First Amendment

The video from the arresting officer's body-worn camera in this case makes clear that Ms. Santiago was arrested for the content of her speech, not for any conduct that could permissibly be restricted or even the manner of her communication independent of her conduct. (Pet. for Writ of Mandate, Court of Appeal Case No. G 065115,, Exh. E.) She did

not block ingress or egress into the church. The camera footage shows that she was standing away from the entrance and not directly in the path people were taking to enter the church. She prevented no one from entering. She did not use amplified sound. While she was not whispering, the footage clearly shows that she was not yelling at the top of her lungs or otherwise communicating in a way that was designed to disturb rather than to be heard. (*Ibid.*) Yet Ms. Santiago was nonetheless charged with engaging in "rude and indecent behavior" and for creating "unnecessary noise."

The fact that the prosecuting attorney charged her on these facts for violating those statutory provisions and the fact that the lower courts refused to dismiss the charges demonstrate the need for this Court to grant review to provide appropriate limitations on the terms "rude and indecent behavior" and "unnecessary noise" so they comport with the First Amendment.

Specifically, the Court should make clear that rude and indecent behavior must be confined to conduct, not expression protected by the First Amendment. (See *Cohen v. California* (1971) 403 U.S. 15, 18 [holding conviction of man under Penal Code section 415 for disturbing the peace by "offensive conduct" for wearing jacket with "Fuck the Draft" on it violates the First Amendment because it applied to the message he was conveying]. See generally *Roberts v. United States Jaycees* (1984) 468 U.S. 609, 628 ["[V]iolence or other types of potentially expressive activities that produce special harms distinct from their communicative impact ... are entitled to no constitutional protection."].)

With respect to the "unnecessary noise" provision in Penal Code section 302(a), this Court should narrow the term just as it narrowed the phrase "loud and unreasonable noise" in Penal Code section 415(2), which prohibits "willfully disturb[ing] another person by loud and unreasonable noise." (*In Re Brown* (1973) 9 Cal.3d. 612.) In that case, this Court recognized the First Amendment required it to construe the phrase "loud or unreasonable noise" to be prohibited disruption of the peace under Penal Code section 415(2) "only when there is a clear and present danger of violence or when the communication is not intended as such by is merely a guise to disturb persons." (*Id.* at 619. See also *Braxton v. Municipal Court* (1973) 10 Cal.3d 138, 143-44 [narrowly construing Penal Code § 626.4's threshold for punishment— "willful disruption of orderly operation" — because literal application of the

statute "would succumb to constitutional attack both because of First Amendment overbreadth and vagueness"].)

The Court may conclude that the First Amendment interests are different in Penal Code section 302(a) from those addressed in Penal Code section 415(2) because the former applies only in a specific location. (See *Brown*, *supra*, 9 Cal.3d at p. 620.) It nonetheless should make clear to law enforcement officials, prosecuting attorneys, and lower courts that the statute cannot be applied to speech like Ms. Santiago's, *i.e.*, when the speaker is clearly intending to communicate a message and is not using amplified sound at high volume or otherwise communicating in a way that unreasonably disturbs a meeting by volume loud enough to drown out speakers inside a house of worship. Most important, it should explain that—consistent with the First Amendment and Liberty of Speech Clause—noise cannot be deemed "unnecessary" based on the content of what is being communicated, or the negative reaction that listeners may have to the speech. (See, e.g., *Boos v. Barry* (1988) 485 U.S. 312, 320-21 [holding listener objection to speech is not a content-neutral basis for regulation of speech under the First Amendment.]; *Bio-Ethical Reform, supra,* 37 Cal.App. 5th at p. 107 [holding "[l]isteners reaction to speech is not a content-neutral basis for regulation."][internal citation and quotation omitted].) If not, the statute will remain a dangerous tool that law enforcement officers and prosecutors can use to interfere with speech that is protected by the First Amendment and the Liberty of Speech Clause—as they have in this case.

IV. Addressing the First Amendment and Liberty of Speech Clause Issues Posed by Penal Code Section 302(a) Should be Done Now Rather than After the Prosecution is Complete.

The United States Supreme Court and other courts have long recognized that a likelihood of arrest and criminal prosecution under laws that may violate the First Amendment present a risk of injury that can chill the valid exercise of First Amendment rights. (See, e.g., *Babbitt, supra*, 442 U.S. at pp. 298-300; *LSO v. Stroh* (9th Cir. 2000) 205 F.3d 1146, 1155-56; *Navegar, Inc. v. United States* (D.C.Cir.1997) 103 F.3d 994, 999 ["Federal courts most frequently find preenforcement challenges justiciable when the challenged statutes allegedly 'chill' conduct protected by the First Amendment."].) If the threat of criminal prosecution can chill First Amendment rights, then

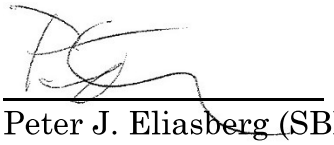
allowing a criminal prosecution *to continue* necessarily has the same or greater potential chilling effect. Thus, it is important that this Court grant review, or review and transfer the matter to the Court of Appeal, to ensure that Ms. Santiago and others who may want to protest near a house of worship are not impermissibly chilled from exercising their First Amendment Liberty of Speech Clause rights because of criminal law provisions that are facially unconstitutional or otherwise in need of narrowing constructions.

V. Conclusion

For the foregoing reasons, *amici curiae* respectfully request this Court either grant the petition for review or issue an order transferring the matter to the Court of Appeal for further review.

Dated: March 25, 2025

Sincerely,



Peter J. Eliasberg (SBN 189110)
ACLU FOUNDATION OF SOUTHERN CALIFORNIA
Email: PEliasberg@aclusocal.org

Attorneys for Amici Curiae

Chessie Thacher (SBN 296767)
ACLU FOUNDATION OF NORTHERN CALIFORNIA
Email: cthacher@aclunc.org

Julia A. Gomez (SBN 316270)
ACLU FOUNDATION OF SAN DIEGO & IMPERIAL COUNTIES
Jgomez@aclusocal.org

David Loy (SBN 229235)
FIRST AMENDMENT COALITION
dloy@firstamendmentcoalition.org

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1313 West Eighth Street, Los Angeles, California 90017. I am employed in the office of a member of the bar of this court at whose direction the service was made.

On March 25, 2025, I served the attached document by electronically transmitting a true copy via this Court's TrueFiling system to the recipients listed on the below service list.

SERVICE LIST

Lina Santiago 5 Paloma Drive Mission Viejo, CA 92692	Through TrueFiling concurrent with the filing to: Orange County District Attorney: appellate@ocdapa.com
In advance by e-mail to: Orange County District Attorney: appellate@ocdapa.com	Through TrueFiling concurrent with the filing to: Attorney General: sdag.docketing@doj.ca.gov
In advance by e-mail to: Attorney General: sdag.docketing@doj.ca.gov	All parties previously served on this matter through TrueFiling

Also on this date, I mailed a copy of the attached document by causing it to be deposited in a sealed envelope with the U.S. Postal Service, with the postage fully prepaid, to the recipients listed below:

Clerk of the Court of Appeal
500 N. Ross St.
Santa Ana, CA 92701

Harbor Justice Center
Department H9
Attn: Hon. Anthony C. Ufland
4601 Jamboree Rd.
Newport Beach, CA 92660

Appellate Division
Department C1
Attn: Adriana Salazar, Clerk
700 Civic Center Drive West
Santa Ana, CA 92701

I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct.

Executed on March 25, 2025, at Buena Park, California.

Michelle Ochoa Castañeda