

In the Supreme Court of the State of California

**Application of Wright for Executive
Clemency.**

Case No. S251879

First Amendment Coalition,

Petitioner,

v.

Governor Edmund G. Brown Jr.

Respondent.

**DECLARATION OF DANIEL J. CALABRETTA IN SUPPORT
OF RESPONDENT'S OPPOSITION TO MOTION TO UNSEAL
CLEMENCY-RELATED COURT RECORDS**

PETER A. KRAUSE
Legal Affairs Secretary
*DANIEL J. CALABRETTA
Deputy Legal Affairs Secretary
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*Attorneys for Respondent Governor
Edmund G. Brown Jr.*

I, Daniel J. Calabretta declare:

1. I make this declaration in support of Respondent Governor Edmund G. Brown Jr.'s Opposition to Unseal Clemency Materials. Except where a fact is specifically stated to be on the basis of information and belief, I have personal knowledge of the facts set forth in this declaration, and were I called to testify to those facts under I oath, I could and would do so.

2. I am an attorney licensed to practice law in the State of California. I am a Deputy Legal Affairs Secretary for Governor Edmund G. Brown Jr., a position I have held for over five years. Prior to joining the Brown Administration, I was a Deputy Attorney General in the California Department of Justice.

3. I am the lead attorney for pardons in the Governor's Office. In that capacity, I oversee all aspects of the pardon process, including how cases are investigated by the Board of Parole Hearings, how those cases are presented to the Governor for his decision, and which cases involving individuals with more than one felony conviction are sent to the California Supreme Court for their recommendation pursuant to Article V, section 8.

4. For approximately three and a half years, I also handled all issues involving Public Record Act requests made to this Office, as well as Public Records Act issues generally. Since approximately February 2017, I

have provided guidance and supervision to the Deputy Legal Affairs Secretary who currently oversees Public Records Act requests to this office, particularly when they involve requests related to Clemency.

5. I have reviewed over a thousand pardon files and am familiar with the kind of information that is typically contained in a pardon file. Those files always include summary criminal history information (also known as a RAP sheet), as well as information from the Department of Motor Vehicles. The file typically contains probation reports, reports of the District Attorney in which the applicant has obtained a Certificate of Rehabilitation, or other available records of the trial court regarding the conviction for which the individual wishes to obtain a pardon. In addition, the assigned Investigator from the Board of Parole Hearings will routinely speak or correspond with the applicant to get additional information, and will often speak to the applicant's references. The Investigator will include any information they believe is relevant in a confidential report addressed to the Governor's Legal Affairs Secretary.

6. When I am reviewing a pardon application, I will often direct the Board of Parole Hearings to obtain information regarding specific issues or questions I have about the file. The information I receive from the Board of Parole Hearings often informs how a particular application is handled. In my judgment, this back and forth would reveal my deliberative process, as it reflects the information I believe is important to the

consideration of an individual case. If I knew my queries to the Board of Parole Hearings and their response would be made public, it would have a chilling effect on what information I requested and how I requested it.

7. Typically, the Governor acts on a group of pardon applications at once. The pardon certificates are included in a press release that is issued by our Office once those pardons are granted. As a matter of practice, in response to a Public Records Act request, our Office will also provide a copy of an individual's application once the application is granted. That application will be redacted to protect an applicant's confidential information, such as their address or date of birth in the same manner as the report to the Legislature required by Penal Code section 4807 is redacted.

8. Our office treats clemency files as broadly exempt from disclosure under the Public Records Act. I am aware of only one instance in which our office has released any records in a clemency file, other than the application of an individual who has received a pardon or commutation of sentence and the clemency certificate. In one case, involving an application for clemency by Kevin Cooper, our office released the formal written request to attorneys for Mr. Cooper and the District Attorney regarding Mr. Cooper's request for additional forensic testing, as well as the responses to that request that were filed in the form of briefs. No other portions of Mr. Cooper's file have been released to the public. On

information and belief, in all other cases our office has denied any Public Record Act request for clemency materials other than the application or certificate. The response our office issued to the First Amendment Coalition's Public Records Act request and included in Exhibit F to the Declaration of David Snyder in Support of Petitioner's Motion to Unseal Clemency-Related Court Records is typical of responses our office has made to Public Records Act requests regarding other clemency-related materials.

9. Attached hereto as Exhibit A is a true and correct copy of the current version of the Pardon Applicant Questionnaire prepared by our Office that is sent to all pardon applicants by the Board of Parole Hearings during their investigation.

10. Attached hereto as Exhibit B is a true and correct copy of the pardon certificate issued to former Senator Roderick Wright on November 21, 2018.

11. Attached hereto as Exhibit C is a true and correct copy of former Senator Roderick Wright's application for a pardon filed with our office.

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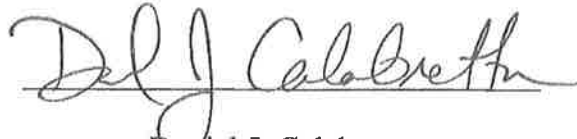
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed the 26th of November, 2018, in Sacramento, California.

A handwritten signature in cursive script, reading "Daniel J. Calabretta", written over a horizontal line.

Daniel J. Calabretta

EXHIBIT A

State of California
PARDON APPLICANT QUESTIONNAIRE

Fully answer all applicable questions

A. PERSONAL

1. Full Name: _____
First Middle Last
2. Address: _____
Street
City State Zip Code
County of Residence: _____
Mailing Address (if different from above): _____
Street
City State Zip Code
3. Telephone No.: _____
Home Cell Work
4. Date of Birth: _____ Social Security Number: _____
Month Day Year
5. Place of Birth: _____ U.S. Citizen: Yes ☐ No ☐
City State
6. If naturalized, when and where: _____
7. Driver's License Number : _____

B. CONVICTION SUMMARY

Describe your involvement in the circumstances of the crime(s) for which you are requesting a pardon (attach additional pages if necessary). _____

C. PARDON REQUEST

1. Explain why you **want** a pardon (attach additional pages if necessary). _____

2. Explain why you think you should be **granted** a pardon (attach additional pages if necessary). _____

D. MARITAL

1. Single: ☐ Married: ☐ Divorced: ☐ Separated: ☐ Widowed: ☐ Common Law: ☐

D. MARITAL – continued

2. List dates of all marriages and divorces, if any, giving name of spouse.

Name of Spouse	Date of Marriage	Date of Divorce

3. Are you making alimony or child support payments? Yes ☐ No ☐

Were the payments ordered by the court? Yes ☐ No ☐

* If yes, indicate the name and address of the court and include original/updated payment information:

If yes, indicate the name and address of person/agency where payments are made: _____

E. CHILDREN

List all children and their year of birth.

Name	Month/Day/Year	Relationship (natural, step child, adopted)

F. FINANCIAL**1. EMPLOYMENT**

Begin with your present or most recent job. Please list all employment for past 5 years. If there have been any periods of unemployment, indicate the dates, sources of income and monthly amounts. If you are updating an earlier pardon applicant questionnaire, indicate any changes in your work, such as a new employer, new duties or an increase in salary. Attach additional pages if necessary.

Employment Period: From _____ To _____

Name and address of employer: _____

Job title: _____

Full-time ☐ Part-time ☐ Salary: \$ _____

Reason for leaving: _____

Employment Period: From _____ To _____

Name and address of employer: _____

Job title: _____

Full-time ☐ Part-time ☐ Salary: \$ _____

Reason for leaving: _____

F. FINANCIAL – continued

Employment Period: From _____ To _____

Name and address of employer: _____

Job title: _____

Full-time ☐ Part-time ☐ Salary: \$ _____

Reason for leaving: _____

Employment Period: From _____ To _____

Name and address of employer: _____

Job title: _____

Full-time ☐ Part-time ☐ Salary: \$ _____

Reason for leaving: _____

2. Name of spouse's employer: _____

Spouse's Occupation: _____

3. If you are retired, disabled, or receiving public assistance, show amount of income for each:

4. Have you filed for bankruptcy in the last 10 years? Yes ☐ No ☐

* If yes, complete the following **and** provide any Court Order to show dismissal of debt:

Date, city and court where settled: _____

Bankruptcy number (if known): _____

Amount of bankruptcy: \$ _____

Reason for filing bankruptcy: _____

Did you receive a discharge? _____

G. RESIDENCE

Begin with your current residence. List the dates of residence, address and if purchased or rented. Please list all residences for the past 5 years. Attach additional pages if necessary.

Date: From _____ To _____

Address: _____

Purchased ☐ Rented ☐

Date: From _____ To _____

Address: _____

Purchased ☐ Rented ☐

G. RESIDENCE – continued

Date: From _____ To _____
Address: _____

Purchased ☐ Rented ☐

Date: From _____ To _____
Address: _____

Purchased ☐ Rented ☐

Date: From _____ To _____
Address: _____

Purchased ☐ Rented ☐

H. EDUCATION

1. What is the highest grade you completed?

8 ☐ 9 ☐ 10 ☐ 11 ☐ 12 ☐ Some college ☐ AA ☐ BA/BS ☐ Graduate program ☐

Are you a high school graduate? Yes ☐ No ☐ Equivalency test ☐

2. Advanced Education

Name and location of school	Course of study	Degree	Date completed

3. Vocational Education

Name and location of business/trade school	Course of study	Degree	Date completed

If you are currently enrolled or attending a training program, please explain: _____

I. MILITARY SERVICE

1. Veteran: Yes ☐ No ☐ Branch of Service: _____ Serial number: _____
Date entered: _____ Date discharged: _____ Type of discharge: _____

J. COMPENSATION

1. Have you compensated or agreed to compensate any individual for assisting you with your pardon application? Yes ☐ No ☐

If yes, complete the following:

Name of individual who assisted you: _____

Address: _____

Street

City

State

Zip Code

Amount Paid: \$ _____

Is the individual an attorney? Yes ☐ No ☐

K. ADDITIONAL INFORMATION

1. Restitution

If your crime victim(s) suffered a financial loss and restitution was ordered, has the restitution order been satisfied? Yes ☐ No ☐

*If yes, please provide the appropriate Court Documents.

2. Have any civil actions been filed against you since your release from prison, jail or placement on felony probation? Yes ☐ No ☐

If yes, please explain: _____

3. Are your immediate family members aware of your application for pardon? Yes ☐ No ☐

4. May your current employer be contacted? Yes ☐ No ☐

If no, please explain: _____

5. Are you active in any community, group or social activities? Yes ☐ No ☐

If yes, please explain: _____

6. Please list your hobbies, if any: _____

L. LICENSES

Please list any license that you applied for **and** received.

* For each license please identify the type of license, license number, and license expiration date.

License Type	License Number	Expiration Date

M. REFERENCES

Provide the names and contact information of three people who are willing to serve as references for your application.

Name	Address	Phone Number

PHOTOGRAPHS: Submit two color photographs of yourself taken within the past two months.

NOTE: Please submit additional information or copies of documents you believe would be of value to the Governor in making a determination on your case including community or charitable activities (for example, character reference letters, certificates of achievement or any other information not sufficiently covered in the questionnaire). Do not send original documents as all materials are retained in the case file and are not returned.

All answers to the forgoing are true and complete to the best of my knowledge. I understand that any omission or misstatement of facts in the questionnaire may cause cancellation of my application for a pardon.

SIGNATURE: _____
DATE: _____

EXHIBIT B

Executive Department

State of California

PARDON

Roderick D. Wright

Roderick D. Wright, a resident of California, has submitted to this office an application for executive clemency.

He was sentenced on or about March 8, 1972, in the Superior Court of the State of California in and for the County of Los Angeles, for the crime of taking a vehicle without the owner's consent. He served one year, six months probation. He was discharged on September 19, 1973, having completed his sentence. He was sentenced on or about January 28, 2014, in the Superior Court of the State of California in and for the County of Los Angeles, for the crimes of perjury, false declaration of candidacy and fraudulent voting or attempting to fraudulently vote. Specifically, Mr. Wright listed a room in an apartment building he owned as his legal domicile on his voter registration and declaration of candidacy. The trial court dismissed the prosecutor's case, but the Court of Appeal reversed, concluding that the address Mr. Wright listed did not meet the legal test to establish domicile. Mr. Wright served three years, six months probation and completed 1,500 hours of community service. He was discharged on August 15, 2017 having completed his sentence.

Roderick D. Wright has submitted to this office a formal application for executive clemency in the form of a gubernatorial pardon. He has shown that since his release from custody, he has lived an honest and upright life, exhibited good moral character, and conducted himself as a law abiding citizen. Indeed, Mr. Wright has devoted much of his life to public service, including serving six years in the California State Senate and six years in the California Assembly. Following his conviction, in a bipartisan vote the Legislature enacted Senate Bill 1250 (2017-2018 Leg. Sess.), which clarifies the law regarding the domicile of an elected official. The Legislative history of that bill specifically cited Mr. Wright's conviction as the reason why clarity in this area of the law was necessary.

The Board of Parole Hearings received and reviewed Mr. Wright's pardon application and related materials pursuant to California Penal Code section 4802, and recommended him for a pardon on September 18, 2018. Mr. Wright also received a recommendation for a pardon by a majority of the justices of the Supreme Court of California, received on November 20, 2018, as required by article V, section 8 subdivision (a) of the California Constitution.

By the laws of this state it is proper that I, as Governor of the State of California, give testimony that, by completion of his sentence and good conduct in the community of his residence since his release, Roderick D. Wright, has paid his debt to society and earned a full and unconditional pardon.

THEREFORE, I, EDMUND G. BROWN JR., Governor of the State of California, by virtue of the power and authority vested in me by the Constitution and statutes of the State of California, do hereby grant to Roderick D. Wright a full and unconditional pardon for the above offense, including the right to own, possess, and keep a firearm to the extent permitted by California Penal Code Section 4854.



IN WITNESS WHEREOF I have
hereunto set my hand and caused the
Great Seal of the State of California to be
affixed this 21st Day of November, 2018.


EDMUND G. BROWN JR.
Governor of California

ATTEST:


ALEX PADILLA
Secretary of State

EXHIBIT C



Governor Edmund G. Brown Jr. · State Capitol · Sacramento, California 95814

P-2712-18

RECEIVED

FEB 20 2018

GOVERNOR'S OFFICE
LEGAL AFFAIRS

APPLICATION FOR GUBERNATORIAL PARDON

Complete this application to request a pardon from the Governor. A pardon is the forgiveness of a crime. If you are eligible for a Certificate of Rehabilitation, do not complete this application; instead obtain a Certificate of Rehabilitation from the superior court in your county of residence. (See Penal Code, § 4852.01.) If a pardon is granted, this application will become a public record, however specific personal information will be redacted (hidden) before it is made available to the public.

APPLICANT INFORMATION

Name: Roderick D. Wright Date of Birth: [REDACTED] Email Address: [REDACTED]@[REDACTED]
Address: [REDACTED] Phone Number: [REDACTED]

1. Conviction Summary:

List all prior convictions, including any in other states or countries. Attach additional pages if necessary.

Offense(s):	Date of offense(s):	County of conviction(s):	Sentence(s):
See Additional Page			

2. Briefly describe the circumstances of the crime(s) for which you are requesting a pardon (attach additional pages as necessary):

See Additional Page

3. Explain why you are requesting a pardon (attach additional pages as necessary):

See Additional Page

4. Provide a brief statement explaining why you should be granted a pardon (attach additional pages if necessary):

See Additional Page

5. If you have paid any money or given any gift to anyone to assist in the preparation of this application, list their name, address, and amount paid or given (required by Penal Code section 4807.2):

See Additional Page

1) Conviction Summary / List all prior convictions

9/13/71 - LAPD – 10852 VC (Tamper with Vehicle) Misdemeanor, One year summary probation or fine. Imposition of sentence suspended. Case 396037

11/14/71 LAPD – 10851 VC (Take Vehicle without Owner's Consent) On 9/19/73 conviction set aside and dismissed pursuant to 1203.4 PC

1/31/86 – L.A. County District Attorney – Convicted as 182 PC on 1/14/87 misdemeanor, 36 months summary probation, imposition of sentence suspended.

2) Briefly describe the circumstances of the crime(s) for which you are requesting a pardon.

I was convicted of perjury and voter fraud on January 28, 2014 in the Los Angeles Superior Court, case number BA361187-01. The case was based on my listing my property in the City of Inglewood as the domicile address on my voter registration affidavit filed in 2007. This resulted in eight charges: two counts of filing a false document (when I filed my declaration of candidacy for the State Senate in 2008 it was signed twice); and, five counts of voter fraud for each election in which I simply voted between 2007 and 2009, in addition to the registration affidavit. To the best of my knowledge, I am the only sitting legislator ever charged or convicted of these offenses.

Much of this case centered on how the law, specifically Election Code section 349¹, is interpreted. I am the sole owner and taxpayer of the property listed as my domicile on the voter registration affidavit. I have continuously owned this property since 1977. I shared a three bedroom detached house on this property with my stepmother pursuant to a written rental agreement. I also own and reside in another residence in Baldwin Hills. I have been in the residential apartment business for over 40 years, so I did not think it would be a problem for me to establish domicile in my own house. The entire case was based on circumstantial evidence as there was no direct evidence of a crime. At no point during the trial was any evidence presented that there was a legal or physical reason I could not have been domiciled at my Inglewood property. To complicate this matter even further, I also had a condo in

¹ 349.

(a) "Residence" for voting purposes means a person's domicile.

(b) The domicile of a person is that place in which his or her habitation is fixed, wherein the person has the intention of remaining, and to which, whenever he or she is absent, the person has the intention of returning. At a given time, a person may have only one domicile.

(c) The residence of a person is that place in which the person's habitation is fixed for some period of time, but wherein he or she does not have the intention of remaining. At a given time, a person may have more than one residence.

Sacramento where I also “lived” much of the time. To my detriment I did not spend much time in Inglewood or Baldwin Hills. I am not aware of any standard as to how much time a person must spend at a residence for it to be considered a domicile. If there were such a standard, I would have complied with it.

Election Code §349 allows a person to have more than one residence and only one domicile, which I had. Including my condo in Sacramento, I actually “lived” in three residences. While I had multiple residences, I only had one domicile. Incidentally, while I lived in Baldwin Hills, I never declared domicile there. I never used the Baldwin Hills residence for a homeowner’s tax exemption, California driver’s license, voter registration, or a passport—with the exception of the homeowner’s exemption, which is on a third property I own, all these items all declared on my property in Inglewood. Nothing in the law specifies that the more expensive residence or even the one where the most time is spent is by, default, the domicile. In fact relevant case law in this area says;

“The major issue involved in this appeal is whether or not the trial court erred when it ruled that respondent was “residing” within the district under Government Code section 61200. The trial court found that although respondent had been physically residing outside of the district, she was in fact “domiciled” within the district at Big Oak Flat and therefore “residing” within the district under Government Code section 61200.” Fenton v. Board of Directors (1984) 156 Cal.App.3d 1107.

Another important element in this case was the reinterpretation of Election Code section 2026², which granted a “conclusive presumption” of domicile to a state or federal legislator. The trial judge, the Office of Legislative Counsel, and former Assembly Speaker Willie L. Brown, the author of the legislation that became EC §2026, all agreed that a correct interpretation of the law would have provided me with an affirmative defense against some of these charges. The Legislative Counsel submitted an Amicus Curiae letter to the appellate court citing their understanding of the intent of the statute. Unfortunately, the Second District Court of Appeals interpreted EC §2026 differently and reversed the trial judge on a writ filed by the prosecution. Our subsequent Petition for Review was declined by the Supreme Court, so the clear meaning of the statute was changed in this case. This appellate decision effectively nullified the law, and I was retroactively charged and convicted under the new interpretation.

² 2026.

The domicile of a Member of the Legislature or a Representative in the Congress of the United States shall be conclusively presumed to be at the residence address indicated on that person’s currently filed affidavit of registration.

It is my understanding that perjury is a crime that usually requires specific intent. There was never an attempt to demonstrate any criminal intent on my part. I own all properties in question, and they were all listed on my publicly available FPPC Form 700. Additionally, I am the owner and taxpayer listed at the Los Angeles County Assessor's Office for these properties.

In this case, the term "live" was often conflated with "domicile." This sleight of hand was allowed because the actual voter registration affidavit I signed said "live." Although the statute says "residence" and "domicile," the affidavit said "live." Election Code §2157³ makes it clear that the voter registration affidavit is an editorial document and allows the Secretary of State complete discretion to use whatever language he or she chooses, provided it assists the voter in completing the form. Election Code §2157 makes clear the language on the affidavit does not substitute for the statute; however, this is precisely what was allowed to happen in this case.

The prosecution split hairs in their quest to substitute the words "domicile" and "residence" for "live." Having to explain to a jury the difference between "live" and "domicile" proved to be a burden my defense team and I could not overcome. Most people believe that legislators must live in a district in order to seek an elected office; however, that is not what the law says. People usually use the colloquial definition of "live," so trying to explain "domicile" and "residence" in this case proved to be an insurmountable challenge. This was compounded by

³ **2157, in part, states:**

(a) Subject to this chapter, the paper affidavit of registration shall be in a form prescribed by regulations adopted by the Secretary of State. The affidavit shall comply with all of the following:

(1) Contain the information prescribed in Section 2150.

(2) Allow for the inclusion of informational language to meet the specific needs of that county, including, but not limited to, the return address of the elections official in that county, and a telephone number at which a voter can obtain elections information in that county.

(3) Be included on one portion of a multipart card, to be known as a voter registration card, the other portions of which shall include information sufficient to facilitate completion and mailing of the affidavit. The affidavit portion of the multipart card shall be numbered according to regulations adopted by the Secretary of State. For purposes of facilitating the distribution of voter registration cards as provided in Section 2158, there shall be attached to the affidavit portion a receipt. The receipt shall be separated from the body of the affidavit by a perforated line.

(4) Contain, in a type size and color of ink that is clearly distinguishable from surrounding text, a statement identical or substantially similar to the following:

"Certain voters facing life-threatening situations may qualify for confidential voter status. For more information, please contact the Secretary of State's Safe At Home program or visit the Secretary of State's Web site."

(5) Contain, in a type size and color of ink that is clearly distinguishable from surrounding text, a statement that the use of voter registration information for commercial purposes is a misdemeanor pursuant to subdivision (a) of Section 2194 and Section 18109, and any suspected misuse shall be reported to the Secretary of State.

(6) Contain a toll-free fraud hotline telephone number maintained by the Secretary of State that the public may use to report suspected fraudulent activity concerning misuse of voter registration information.

(7) Be returnable to the county elections official as a self-enclosed mailer with postage prepaid by the Secretary of State.

the way the trial court was allowing various definitions of "live" and "domicile" to be introduced by the prosecution during the trial.

Because of the complexities involved in this case it took five-plus years to prosecute. This included the writs filed in the appellate court, the trial, post-conviction motions and subsequent appeal. There were also numerous pre-trial motions, including arguments over the witness list and admissible evidence.

3) Explain why you are requesting a pardon?

I experience continuing punishments because of this felony conviction. On occasion, I have had difficulty with travel because the felony appears on airline background checks. Two banks closed accounts due to the investigation and subsequent conviction. One bank actually closed an IRA account which cost me several thousand dollars in tax exposure.

I have had difficulty securing employment, as many employers simply won't consider a candidate with a felony conviction. I never realized the number of restrictions placed on individuals with felony convictions after their sentence is completed. I did not take the sentence of the Court lightly; I served the sentence the Court imposed. I resigned from the Legislature, reported to Los Angeles County Jail to serve the 90 day sentence, completed 1500 hours of community service, completed 30 months of 36 months of probation, and paid over \$5,000 in fines and fees. I am not seeking to have any portion of the sentence commuted but only to have some rights of citizenship restored. I understand that a pardon does not erase the conviction.

While I am no longer serving in elective office, I am still making significant contributions to the community. My experiences in public affairs have proven to be a valuable resource. However, the felony on my record limits my ability to be of even greater service. I am over 65 years of age and only plan to work a few more years before retirement. I believe a pardon would greatly enhance my employment options.

4) Provide a brief statement explaining why you should be granted a pardon.

I have given over 30 years of public service to the people of California. I served 13 years in elected office and over 15 years as a legislative staff member in the City of Los Angeles, State of California, and the United States Congress. I personally authored numerous bills that were signed by four different governors. I provided legislative leadership to the State during the energy crisis of 2000. I continue to volunteer countless hours to community programs. My

professional contributions in both government and the private sector span over 45 years. Despite the complexity of this case, it should be noted I was never accused of abusing my office for personal gain.

After leaving the State Senate, I taught a summer session at the University of California, Davis. I served the County of Los Angeles as a member of an advisory committee focused on how to proceed with Proposition 47 compliance. I provided technical support to the City of Los Angeles in the drafting of the "Ban the Box" ordinance. Working with public and non-profit legal services providers, I participated in organizing justice fairs where we were able to secure reductions from felonies to misdemeanors for hundreds of former felons pursuant to Proposition 47.

In the worst-case scenario, I misinterpreted the law. Clearly, there was no intent to conceal or obfuscate my residences. In hindsight, could I have done more to protect myself? Yes. However, I believe a mistake deserves a second chance. In view of my many years of public service, and the political nature of these charges, I feel a Governor's Pardon would be a fair resolution of this matter.

5) If you have paid any money or given any gift to anyone to assist in the preparation of this application, list their name, address, and amount paid or given. (Required by Penal Code section 4807.2):

This document was prepared by Roderick D. Wright. No money or gifts were given to anyone to assist in its preparation.