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16 Unincorporated association

17 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF VENTURA**

19 Coalition for Historical Integrity an
20 unincorporated association,
21
22 **Petitioners and Plaintiffs,**
23
24 v.
25
26 CITY OF SAN BUENAVENTURA, a
27 chartered municipal corporation, acting by and
28 through its CITY COUNCIL, its governing
legislative body; and DOES 1 through 100,
inclusive,
Respondents and
Defendants.

CASE NO.
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF EX
PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE REGARDING
PRELIMINARY INJUNCTION
[“CEQA Case” filed under the California
Environmental Quality Act, Cal. Pub.
Resources Code, § 21000 et seq.]

I. INTRODUCTION

Since 1936 a statue of Father Junipero Serra has stood prominently in front of the San Buenaventura City Hall (formerly the County Courthouse). At the termination of California Street, it sits atop a rise and is the central feature in front of Ventura's City Hall. In 1973, the City

VENTURA
SUPERIOR COURT
FILED

JUL 21 2020

MICHAEL D. PLANET
Executive Officer and Clerk
BY: _____, Deputy

Amber Coronado

1 Council of Ventura designated the Father Serra site as a local historic landmark, Landmark No. 3.
2 In 1989 the statue was restored by making an exact bronze copy of the existing decaying concrete
3 statue. Since that time the historic nature of the existing statue and its importance to Ventura has
4 been well documented in film and literature alike. The statue is situated in a historic district, is
5 part of the city's Downtown Specific Plan and is noted in the National Register of Historic Places
6 for Ventura's City Hall. The landmark is also featured on the official seal of the County of Ventura
7 and is in the foreground of most photographs and depictions of City Hall.
8

9 Last month, a group began agitating to tear down the statue. Almost immediately – and
10 without any public or even preliminary environmental review process - Ventura Mayor Matt
11 LaVere agreed on behalf of the City to remove what he described as a “designated landmark.”
12 Having made its decision, the City then began a four-week process of manufacturing a post hoc
13 rationale for its decision. Since the City committed to immediately tear down the landmark, it
14 could not comply with its obligations under the California Environmental Quality Act (CEQA).
15 Despite the extensive evidence documenting the historic nature of the statue as well as thousands
16 of pages of public comment, the City remarkably claimed that the statue did not qualify as a
17 historic resource, and that the project to remove the landmark was exempt under the common
18 sense exemption found at Section 15061(b)(3) of the State CEQA Guidelines, which only applies
19 "where it can be seen with certainty that the activity in question may have a significant effect on
20 the environment."
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23 As explained below, the City's reliance on the common sense exemption found at Section
24 15061(b)(3) is improper and violates CEQA and is in conflict with the Specific Plan. The City
25 must undertake an initial study to perform a complete evaluation of the significant impacts of the
26 project, including its aesthetic impacts, impacts on a historic resource, and consistency with the
27 City's various land use plans. At this time, since the City has already instructed staff to
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1 immediately remove the statue, a TRO should issue to maintain the status quo that has existed
2 since 1936. Given the nature of the installation, the removal will damage the historic statue and
3 immediately impact the aesthetics of the City's downtown area.
4

5 **II. FACTS**

6 **ORIGINS OF A LANDMARK**

7 In 1936 a statue of Father Serra was installed in front of what was then the County
8 Courthouse. (Exhibit 1, LA Times Article November 28, 1936). Thirty-seven years later, in
9 November 1973 the City passed a resolution deeming various "sites" as historic landmarks
10 including the "Father Serra Statue." (Exhibit 2, Resolution NO. 73-2). The resolution designating
11 the Father Serra statue a landmark included a parcel map showing the site of the "Father Serra
12 Monument." (Page 4 of Exhibit 2). In the application to be placed on the National Register of
13 Historic Places the statue is prominently featured and the text notes "approach to the Courthouse
14 from the south, with Father Serra statue in the foreground. . ." (Exhibit 3, Application for National
15 Register of Historic Places, [https://npgallery.nps.gov/GetAsset/0fcdb178-c006-4def-b181-
16 2bad1bafed1d/](https://npgallery.nps.gov/GetAsset/0fcdb178-c006-4def-b181-2bad1bafed1d/)).

17 **"LANDMARK RENEWED"**

18 The Father Serra Statue was made of concrete and by the 1970s it was showing wear. In
19 the 1980s vandals doused the statue with paint. The City removed the paint by sandblasting which
20 only accelerated its deterioration (Exhibit 4, 2020 Report of consultant to the city, Historic
21 Resources Group, p. 8, herein referred to the "2020 HRG Report"). In about 1985 the City began
22 reaching out to experts about options to repair the statue. In a letter seeking an expert opinion the
23 Assistant City Manager noted that, "we have been told that the statute is not a great work of art,
24 but it stands prominently in front of City Hall and is on our County Seal and thus is very important
25 to the community." (Exhibit 5, April 17, 1985 Letter). The city then hired experts, including
26 historic restoration experts, to determine the best way to preserve the statue. They determined that
27 given the extent of the deterioration the concrete statute could not be salvaged. Rather than
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1 remove the landmark the City decided to continue it with a more resilient substance, a bronze
2 alloy. (Exhibit 6, Declaration of James Monahan; Exhibit 4, 2020 HRG Report p.X).

3 To help pay for the project the City formed “Father Serra Statute Restoration Committee”
4 of private citizens who engaged in various fundraising activities. Fundraising for the project was a
5 significant community project. Funds were raised by bake sales, the sales of commemorative
6 shirts, pins and stickers. (Exhibit 7, December 22, 1986 Letter from City to service
7 organizations). The funds raised were deposited into a trust fund that was managed by the City.
8 There remains approximately \$10,000 in the fund. (Exhibit 8, page 11, Staff Report to July 16
9 City Council Meeting; <https://www.cityofventura.ca.gov/DocumentCenter/View/22258/12A>).

10 Duplicating the large concrete statue was complicated since it could not be moved. In
11 order to create the replica, over 1782 points of reference were measured. With the measurements
12 Councilman Burns made drawings and cross sections to create an intaglio, or imprint, of the
13 statue.” (HRG 10). Using the drawings, a community of carvers including Wilbur Rubottom, was
14 engaged as master carver. Carving was undertaken at the Livery on Palm Street, and the public
15 was invited to view the work as it happened. After 10,000 hours of carving it was completed in
16 April 1988. (HRG 10). A complex process was used to make a mold of the wooden carving into
17 which molten bronze was poured. The various bronze sections were welded together to make the
18 completed statue. (HRG 10). The completed statute was an “exact replica” of the original. (2016
19 City Landmark Inventory description). As was noted at the dedication ceremony it was a
20 duplication process that had never been done before.

21 The bronze Father Serra statue was unveiled at October 20, 1989 dedication. The handouts
22 distributed at the unveiling stated in bold letters: “From Concrete To Bronze.” (Exhibit 9). The
23 unveiling ceremony was done with a great deal of pomp and circumstance and was attended by the
24 council, county supervisor Tracy, Congressman Lagomarsino and a Chumash representative.
25 (Exhibit 10, Declaration of James Monahan). The ceremony was broadcast as a special report
26 from the city council. Throughout the ceremony it was noted that the audience had witnessed a
27 “landmark renewed.” (Exhibit 10; Declaration of James Monahan).

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1 **CONCRETE STATUE DUMPED**

2 With the landmark restored with a bronze version, the City essentially dumped the concrete
3 version to rot away. Until this process began the City didn't even know where the concrete statue
4 was since it turned out it was left in the open storage yard of the crane operator who removed in
5 1989. It is even unclear who owns the concrete version as the box containing it is labeled
6 "Property of Ventura Co. Historical Museum" and it is such an advanced state of decay it is
7 unrecognizable as a statue. (See photograph attached as Exhibit 11).

8
9 **DOWNTOWN SPECIFIC PLAN – STATUES HISTORICAL & AESTHETIC**

10 **VALUE**

11 The City's Downtown Specific Plan identifies the existing Father Serra statue as a historic
12 resource and even includes a map confirming the statue site at California and Poli Streets. (Exhibit
13 12; [https://www.cityofventura.ca.gov/DocumentCenter/View/9833/Downtown-Specific-Plan-](https://www.cityofventura.ca.gov/DocumentCenter/View/9833/Downtown-Specific-Plan-PDF)
14 [PDF](https://www.cityofventura.ca.gov/DocumentCenter/View/9833/Downtown-Specific-Plan-PDF), p.16). Under the "recommended improvements" portion of the Specific Plan it not only
15 acknowledges the historic resource (Exhibit 12, PDF p.15 "Historic Resources Legend") but
16 acknowledges the aesthetic value and importance of its physical location when it discusses the
17 southern termination of California street i.e., the opposite end of California street (plaza between
18 hotel and parking structure) it suggests that a project should, "Introduce sculptural elements to
19 complement the Father Serra statue at northern terminus of California Street." (Exhibit 12, PDF
20 page 229). Removing the statue's historic designation, or pretending that it never existed to begin
21 with, is inconsistent with the Specific Plan, which governs the statue site directly and as a part of
22 the City's Local Coastal Program.

23 **ENFORCEMENT ACTIONS**

24 The City also required developers to incorporate Historic Landmark No. 3 into their
25 projects. In 2018 the City required a developer who proposed a condominium complex to make
26 their projects a "unified artistic expression that integrates into the context of the Father Serra
27 Statue (Landmark No. 3)" . . . provide simulated photos showing the building with City Hall and
28 Father Serra Statue in context." (Exhibit 13, HPC meeting minutes of August 1, 2018.)

1 **CITY INVENTORY**

2 On May 3, 2016, the City published its own “official” Inventory of Historic Landmarks &
3 Districts and referenced the Father Serra Statue as landmark No. 3 and indicated the location was
4 “501 Poli Street” and noted that the original statue was “replaced by the present bronze one.”
5 (Exhibit 14, Historic Landmarks & Districts
6 [https://www.cityofventura.ca.gov/DocumentCenter/View/7730/CITY-HISTORIC-](https://www.cityofventura.ca.gov/DocumentCenter/View/7730/CITY-HISTORIC-LANDMARKS?bidId=)
7 [LANDMARKS?bidId=](https://www.cityofventura.ca.gov/DocumentCenter/View/7730/CITY-HISTORIC-LANDMARKS?bidId=)).

8 **HRG 2007 HISTORIC RESOURCES SURVEY UPDATE**

9 In 2007 HRG was hired to conduct a historic resources survey for the City of Ventura.
10 The report is a comprehensive document spanning 172 pages that was discusses the survey that
11 occurred between October 2006 and April 2007. (Exhibit 15, (“2007 HRG Report”;
12 [https://www.cityofventura.ca.gov/DocumentCenter/View/1313/Downtown-Historic-Resources-](https://www.cityofventura.ca.gov/DocumentCenter/View/1313/Downtown-Historic-Resources-Survey-PDF?bidId=)
13 [Survey-PDF?bidId=](https://www.cityofventura.ca.gov/DocumentCenter/View/1313/Downtown-Historic-Resources-Survey-PDF?bidId=).) The survey noted that it identified over 1,100 properties and concluded that
14 221 of the properties are “recommended for local Landmark designation, including 64 currently
15 designated.” (Exhibit 15, p. 1). A principal purpose of the survey was to answer the following
16 question: “What is the current status of existing Landmarks and Points of Interest? Do these
17 properties retain sufficient historic integrity to remain eligible for designation?” (Exhibit 15, p. 8).
18 This 2007 report discusses the relevant factors in detail and concludes that the bronze Father Serra
19 Statue on Poli Street is a designated landmark and that it is eligible for Land mark as it is
20 consistent with the laws identifying, designating and preserving historic landmarks. (See, Exhibit
21 15, pages 14, 76 and importantly footnote 82).

22 **CITY AGREES TO TAKE THE STATUE DOWN**

23 From 1989 until June 2020 there is no record that any person questioned whether the
24 Father Serra statute was in fact Landmark No. 3. In fact, it was not until well after the City made
25 its decision on the removal of the statue that it made such a claim.

26 In about the middle of June, 2020 a group of individuals began gathering at the Landmark
27 No. 3 statue and began agitating for its destruction as had occurred at other Father Serra statues in,
28

1 e.g., Los Angeles, and San Francisco. At some point individuals claiming to be Chumash
2 leadership joined the group. However, unlike at other similar events there were also groups
3 defending the statue.

4 Soon thereafter, on June 18, 2020 the City held a special meeting wherein they held a
5 closed session meeting where it discussed, “THREAT TO PUBLIC SERVICES OR
6 FACILITIES”. No minutes of that meeting or the reporting out of that meeting have been
7 produced. It was on that same date that the City issued a press release and letter stating that the
8 Mayor had met with a representative of the Chumash who is a resident of Ojai and Father Tom
9 Elewaut of the Mission San Buenaventura and at that meeting “everyone recognized that the time
10 for action is now.” Notably absent from the meeting were the actual citizens of Ventura. The
11 letter discussed the need to further engage the “community” but noted that “we all believe that the
12 removal of the statute should be accomplished without force” and further noted that they claimed
13 to wish to avoid vandalism to a “designated landmark.” (Exhibit 16).

14 **HPC MEETING – “OFFICIAL” ACTION REQUIREMENT**

15 On July 1, 2020 the City’s Historic Preservation Committee had a special meeting to make
16 a “recommendation” regarding whether the Father Serra statue was a historic landmark. The
17 meeting was highly unusual as the applicant was the City itself and the city staff made the
18 recommendation and presentation. It was at this meeting that the City presented a report by HRG
19 (same entity as) dated June 25, 2020 Report (Exhibit 17). This unsigned report, was researched
20 written (although no authors are listed) and produced in under a week after the City made its
21 announcement that the time had come to remove the statue. The HRG 2020 report notes the
22 various CEQA issues implicated if the statue is deemed historic. The report notes the only
23 exception is if the City were to find that the landmark designation on the statute was actually not
24 on the bronze statue but that it was actually still attached to the concrete statue that was sitting in a
25 storage yard for three decades. The HRG 2020 Report fails to explain the blatant contradiction
26 between the conclusion it reached in this report and its much more detailed 2007 Historic
27 Resources Survey Update where it concluded the bronze statue was a historic landmark. The City
28 was careful to note that the Historic Preservation Committee was not actually making a decision

1 but only a recommendation. Two former long standing members of the Historic Preservation
2 Committee members, and several additional experts, made detailed comments explaining how the
3 existing Serra statue is obviously Landmark No.3 and that pursuant to accepted standards,
4 including, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with*
5 *Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings (Exhibit*
6 *18)*, the bronze statue was the only viable manner to preserve the landmark. Mr. Stephen Schafer,
7 the former chair of the HPC noted that other sites such as the Ventura Pier have been entirely
8 replaced but remain landmarks.

9 It was at this meeting that the City stated the position that it was essential that there be a
10 "formal action" by the city in 1989 whereby it delisted the landmark designation for the concrete
11 statue and formally designate the bronze statue as the landmark. Staff told the HPC that such
12 "formal action" was required. When staff was asked what "formal action" would have been
13 required in 1989, it responded that it did not know. Declaration of James McDermott.

14 **SHAM "DIALOGUE" NO. 1**

15 The City held a meeting on July 7, 2020, where the staff recommendation was to: "Find
16 that the Bronze Statue does not meet the requirements for historic designation, based on the
17 recommendation of the Historic Preservation Committee and the report prepared by the Historic
18 Resources Group." (Exhibit 17). The city was notified of the manifold defects in the process, i.e.,
19 CEQA action was not properly identified, the Mayor and others had already prejudged the matter
20 and were required to recuse themselves, and the difficulty of the public participation.

21 The meeting was held "virtually" pursuant to the Governor's Emergency Order that
22 allowed public meetings to be held via video conference. The public response to the meeting was
23 overwhelming with over one thousand pages of comments and well over 100 speakers making
24 public comments. At one point the meeting "crashed" for technical reasons and speakers were
25 limited to one minute with several people later noting that they could not participate.

26 At the beginning of the meeting the City acknowledged that they had improperly noticed
27 the meeting and that the Mayor was recusing himself from the process as he could not be
28 impartial. Given the defects in the notice, no action was taken.

1 practically will likely be damaged as is not designed to be removed. The City will suffer no harm
2 as they are simply avoiding an expensive public works project that would have to be reversed.
3 This is particularly true given the likely short duration of a Temporary Restraining Order.

4 Accordingly, a temporary restraining order is necessary to preserve the status quo while
5 Petitioner's application for a preliminary injunction is pending.

6 **CITY'S ENTIRE PROCESS WAS A POST HOC RATIONALIZATION FOR A**
7 **DECISION MADE IN WRITING BEFORE THE PROCESS BEGAN**

8 Given that the City announced on June 18, 2020 that, "the time for action is now" and that
9 "we believe that the removal of the statute should be accomplished without force . . ." there is
10 little question that any determination about an exemption from CEQA is simply a post hoc
11 rationalization. (Exhibit 16). At the outset the City was told the proper way to proceed to remove a
12 landmark was to conduct an EIR and was provided a template of a process carried out by the City
13 of Arcata. (<https://www.cityofarcata.org/787/McKinley-Statue>).

14
15 **IT IS COMMON SENSE THAT AN EXEMPTION DOES NOT APPLY TO A**
16 **REGISTERED LANDMARK**

17 Also, in making its determination on July 15, 2020, to remove the Bronze Statue, the City
18 Council made two very important and unsupported findings. First, the City Council found that
19 "the Bronze Statue is not Landmark #3 nor does it qualify as a historic resource on its own."
20 Second, the City Council found, without providing any date or explanation whatsoever, that "the
21 common sense exemption from the California Environmental Quality Act (CEQA) found in
22 Section 15061 of the State CEQA Guidelines applies ... based on the fact the determination to
23 remove or relocate a non-historic statue will not have a significant impact on the environment."
24 (Exhibit 8, p 7, Draft Resolution at p. 267 (a final has not been published); Declaration of James
25 McDermott ¶ XX).

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1 Neither of the above findings is supported by the record before the City Council. The
2 above discussion of the extensive factual history behind the Bronze Statue demonstrates the
3 existence of solid and ample evidence documenting the historic nature of the Bronze Statue.
4 Further, the City and its consultant Historic Resources Group both failed to address the issue of
5 whether the Bronze Statue was a reconstruction of the original concrete statue, and therefore
6 assumed the landmark designation of the original. Since the City did not fully address this critical
7 issue, the City's findings are therefore suspect, and its determinations that (1) the statue is not a
8 historic resource and (2) removal of the statue is exempt from CEQA based on the common sense
9 exemption both fail for being based on unsupported findings. Further, the fact that there is
10 presently a significant dispute about the statue and its historic nature means that the common sense
11 exemption logically cannot apply.
12

13
14 The common sense exemption codified at CEQA Guideline Section 15061(b)((3) states as
15 follows:

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17 "The activity is covered by the common sense exemption that CEQA applies only
18 to projects which have the potential for causing a significant effect on the
19 environment. Where it can be seen with **certainty** that there is no possibility that
the activity in question may have a significant effect on the environment, the
activity is not subject to CEQA."

20
21 In *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal.4th 372, the
22 California Supreme Court explained that "whether a particular activity qualifies for the
23 commonsense exemption presents an issue of fact, and that the agency invoking the exemption has
24 the burden of demonstrating it applies. An agency's duty to provide such factual support 'is all
25 the more important where the record shows, as it does here, that opponents of the project have
26 raised arguments regarding possible significant environmental impact.'" *Id.* at 386 (citations
27
28

1 omitted). The Supreme Court relied in part on the decision in *Davidon Homes v. City of San Jose*
2 (1997) 54 Cal.App.4th 106 for elaborating on the application of the common sense exemption.

3
4 In *Davidon Homes*, the City of San Jose adopted an ordinance providing for a geological
5 study which required invasive techniques, including deep borings. The City of San Jose found
6 that the project was exempt from environmental review, relying on the commonsense exemption
7 found at CEQA Guidelines Section 15061(b)(3). The City was sued on the basis that there was
8 no evidence in the record to support the CEQA exemption. The Court ruled against the City,
9 finding that it abused its discretion.

10
11 The Court discussed the commonsense exemption at length. The Court expressed the
12 standard that “the showing required of a party challenging an exemption under Guidelines section
13 15061, subdivision (b)(3) is slight, since that exemption requires the agency to be certain that there
14 is no possibility that the project may cause significant environmental impacts. If legitimate
15 questions can be raised about whether the project might have a significant impact and there is any
16 dispute about the possibility of such an impact, the agency cannot find with certainty that a project
17 is exempt. As the court in *Myers v. Board of Supervisors* (1976) 58 Cal.App. 3d 413 [129 Cal.
18 Rptr. 902] observed, the exemption under subdivision (b)(3) should be reserved for those
19 ‘obviously exempt’ projects, ‘where its absolute and precise language clearly applies.’” (*Id.* at
20 117, emphasis added). The Court thus held “that if a reasonable argument is made to suggest a
21 possibility that a project will cause a significant environmental impact, the agency must refute that
22 claim to a certainty before finding that the exemption applies.”
23
24

25 **PETITIONER WILL LIKELY PREVAIL**

26 Petitioner only needs to show a “reasonable probability” that it will prevail at trial. In this
27 case, that requirement is easily met.
28

1 In reviewing an action under CEQA, the reviewing court must set as de the respondent
2 agency's action if the agency either failed to proceed in a manner required by law or its
3 determinations were not supported by substantial evidence. Pub. Res. Code §§ 21168,21168.5;
4 Laurel Heights Improvement Ass'n v. Regents of Univ. of Calif. ("Laurel Heigh I") (1988) 47
5 Cal.3d 376, 392, n.5. Failure to proceed in a manner required by CEQA constitutes an abuse of
6 discretion, and requires that the agency action be set aside. Ibid. The reviewing court "must...
7 scrupulously enforce all legislatively mandated CEQA requirements. Citizens of Goleta Valley v.
8 Board of Supervisors (1990) 52 Cal.3d 553, 564.

9 In this case, the City proceeded in a manner not in accordance with law by approving a
10 project before conducting any environmental review. CEQA requires that, before a public agency
11 approves a project, it must conduct an environmental review of the project, consisting of an initial
12 study followed by preparation of either an environmental impact report ("EIR") or a negative
13 declaration. See Guideline §15002(f), (k).

14
15 **PETITIONER SHOULD NOT BE REQUIRED TO POST AN UNDERTAKING TO**
16 **OBTAIN THE TEMPORARY RESTRAINING ORDER**

17 There is no requirement that an applicant for a temporary restraining order post an
18 undertaking. Weil & Brown, *Cal. Prac. Guide: Civ. Pro. Before Trial* ¶ 9:603 (The Rutter Group
19 2003). Although the Court has discretion to require an undertaking, Petitioner respectfully submits
20 it would be inappropriate in the instant case.

21 It will only be a short period of time between the granting of the TRO and the hearing on
22 Petitioner's preliminary injunction. Accordingly, it will not be a substantial financial hardship to
23 Real Parties in Interest to forego construction work during this time.

24 Accordingly, Petitioner respectfully requests that the Court not require it to post an
25 undertaking as a condition of granting the TRO.

26 **VI. CONCLUSION**

27 For the foregoing reasons, Petitioner respectfully requests that the Court issue a temporary
28 restraining order prohibiting the City from removing the Father Serra Statue situated in front of

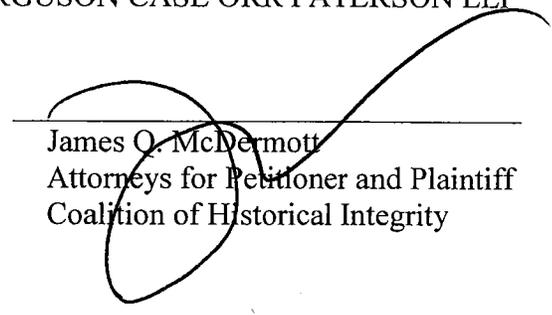
1 City Hall at 501 Poli Street and an order to show cause why a preliminary injunction should not be
2 issued precluding the same conduct while this action is pending.

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Dated: July 20, 2020

Respectfully Submitted,

FERGUSON CASE ORR PATERSON LLP

By: 
James O. McDermott
Attorneys for Petitioner and Plaintiff
Coalition of Historical Integrity

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