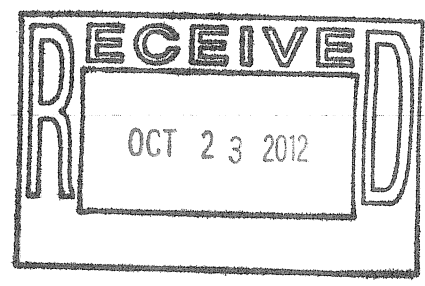


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6 Attorneys for Defendant Christine Cohen,
 Ventura County Auditor Controller

(EXEMPT FROM FILING
 FEES [Gov. Code, § 6103].)

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SACRAMENTO

9
 10 CITY OF BELLFLOWER;) No. 34-2012-80001269
 SUCCESSOR AGENCY OF THE)
 11 DISSOLVED REDEVELOPMENT) GENERAL DENIAL BY DEFENDANT
 AGENCY OF THE CITY OF) AND RESPONDENT CHRISTINE L.
 12 BELLFLOWER; CITY OF CERRITOS;) COHEN, IN HER OFFICIAL
 CERRITOS REDEVELOPMENT) CAPACITY AS VENTURA COUNTY
 13 AGENCY SUCCESSOR AGENCY;) AUDITOR-CONTROLLER, TO
 CITY OF CHULA VISTA; CHULA) COMPLAINT FOR DECLARATORY
 14 VISTA REDEVELOPMENT AGENCY) AND INJUNCTIVE RELIEF AND
 SUCCESSOR AGENCY; CITY OF EL) PETITION FOR WRIT OF MANDATE
 15 CENTRO; EL CENTRO)
 REDEVELOPMENT AGENCY)
 16 SUCCESSOR AGENCY; CITY OF)
 FOLSOM; FOLSOM)
 17 REDEVELOPMENT AGENCY)
 SUCCESSOR AGENCY; CITY OF)
 18 GRASS VALLEY; GRASS VALLEY)
 REDEVELOPMENT AGENCY)
 19 SUCCESSOR AGENCY; CITY OF)
 HUGHSON; HUGHSON)
 20 REDEVELOPMENT AGENCY)
 SUCCESSOR AGENCY; CITY OF)
 21 LOMPOC; SUCCESSOR AGENCY TO)
 THE DISSOLVED LOMPOC)
 22 REDEVELOPMENT AGENCY; CITY)
 OF OXNARD; OXNARD)
 23 COMMUNITY DEVELOPMENT)
 COMMISSION SUCCESSOR)
 24 AGENCY; CITY OF SAN GABRIEL;)
 SAN GABRIEL REDEVELOPMENT)
 25 AGENCY SUCCESSOR AGENCY;)
 CITY OF SIGNAL HILL; SIGNAL)
 26 HILL REDEVELOPMENT AGENCY)
 SUCCESSOR AGENCY; CITY OF)
 27 TRUCKEE; TRUCKEE)
 REDEVELOPMENT AGENCY)
 28 SUCCESSOR AGENCY; CITY OF)
 TULARE; TULARE)

Complaint filed: September 19, 2012
 Assigned to Judge Frawley, Dept. 29

1 REDEVELOPMENT AGENCY)
2 SUCCESSOR AGENCY,)

3 Petitioners/Plaintiffs,)

4 v.)

5 ANA MATOSANTOS, in her official)
6 capacity as California State Director of)
7 Finance; CALIFORNIA STATE)
8 BOARD OF EQUALIZATION;)
9 WENDY WATANABE, in her official)
10 capacity as Los Angeles County Auditor-)
11 Controller; RITA WOODARD, in her)
12 official capacity as Tulare County)
13 Auditor-Controller; MARCIA SALTER,)
14 in her official capacity as Nevada County)
15 Auditor-Controller; JULIE VALVERDE)
16 in her official capacity as Sacramento)
17 County Auditor-Controller; DOUGLAS)
18 NEWLAND in his official capacity as)
19 Imperial County Auditor-Controller;)
20 LAUREN KLEIN in her official capacity)
21 as Stanislaus County Auditor-Controller;)
22 TRACY SANDOVAL in her official)
23 capacity as San Diego County Auditor-)
24 Controller; CHRISTINE L. COHEN in)
25 her official capacity as Ventura County)
26 Auditor-Controller; ROBERT W. GEIS,)
27 in his official capacity as Santa Barbara)
28 County Auditor-Controller; and DOES 1-)
10, inclusive,)

Respondents/Defendants.)

19 COMES NOW respondent and defendant, Christine L. Cohen in her official
20 capacity as Ventura County Auditor-Controller (“Cohen”), and in answer to the
21 unverified complaint and petition for writ of mandate generally denies each and every
22 allegation contained therein pursuant to section 431.30, subdivision (d), of the California
23 Code of Civil Procedure.

24 WHEREFORE, respondent and defendant Cohen prays for relief as follows:

- 25 1. That the petition and complaint as against respondent and defendant Cohen
26 be denied;
- 27 2. That petitioners and plaintiffs’ claims against respondent and defendant
28 Cohen be dismissed;

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- 3. That judgment be entered in favor of respondent and defendant Cohen;
- 4. For attorney fees;
- 5. For costs of suit;
- 6. For such other and further relief as the court deems proper.

LEROY SMITH
County Counsel, County of Ventura

Dated: October 18, 2012

By Roberto R. Orellana
ROBERTO R. ORELLANA
Assistant County Counsel

Attorneys for Defendant Christine L. Cohen,
Ventura County Auditor-Controller