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IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

KYLE KJOLLER, Petitioner, v. SUPERIOR COURT OF NEVADA COUNTY, Respondent; PEOPLE OF THE STATE OF CALIFORNIA; Real Party in Interest.	No. _____ Third District Court of Appeal No. C104445 Nevada County Sup. Court No. CR0005981

PETITION FOR REVIEW

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QUESTION PRESENTED

1. Should this case be remanded to the Court of Appeal with directions that it issue an Order to Show Cause why it should not impose sanctions against the Nevada County District Attorney where the District Attorney:

   i. Filed a brief in the Court of Appeal responding to a pretrial habeas petition, seemingly drafted by generative artificial intelligence and signed under penalty of perjury, that misrepresented the record, cited fabricated authority, and materially misstated the holdings of genuine cases;

   ii. Refused to withdraw or correct the misrepresentations, instead filing another brief denying any fabrication and threatening Petitioner's counsel with retaliatory disciplinary action for requesting investigation into their submission of fabricated authority; and

   iii. Has recently filed other briefs citing fabricated authority, and, just one week before filing the brief in this case, the trial court warned the Office to be careful when using generative artificial intelligence to draft briefing.

INTRODUCTION

TO THE HONORABLE CHIEF JUSTICE GUERRERO, AND THE HONORABLE ASSOCIATE JUSTICES OF THE SUPREME COURT OF THE STATE OF CALIFORNIA:

The Nevada County District Attorney's Office has, in at least three criminal cases in recent weeks, filed briefing citing to fabricated authority. So far, it has not admitted to doing so. In this case, the District Attorney instead responded by offering questionable, inconsistent, and incoherent justifications for the fabricated citations to Petitioner's counsel; declining to correct the errors in court; minimizing or misrepresenting the conduct to the Court of Appeal; and privately suggesting the risk of ethical consequences for Petitioner's counsel if they did not withdraw, or if they renewed, their Motion asking the Court of Appeal to investigate the District Attorney's submission of fabricated authority. The Court of Appeal twice, without any explanation, denied Petitioner's request to investigate the nature of what happened in this case—i.e., that it issue an Order to Show Cause why it should not impose sanctions against the District Attorney. After the Court of Appeal's denials, further evidence has emerged of two other briefs with fabricated citations and quotes filed in other criminal cases by the District Attorney. One is signed by the same Deputy District Attorney as in this case. The other garnered an admonition from the superior court that the District Attorney's Office take care in using artificial intelligence to draft briefing. The District Attorney filed his brief containing fabricated citations in this case one week later.

"[L]awyers are essential to the primary governmental function of administering justice, and have historically been 'officers of the courts.'" *Goldfarb v. Virginia State Bar*, 421 U.S. 773, 792 (1975). At the core of that function is a duty of candor: "It is critical to both the bench and the bar that we be able to rely on the honesty of counsel. The term 'officer of the court,' with all the assumptions of honor and integrity that append to it, must not be allowed to lose its significance." *Kleveland v. Siegel & Wolensky, LLP*, 215 Cal. App. 4th 534, 559 (2013) (citation omitted). Prosecutors, who possess enormous power over the lives of ordinary people, are held to an even higher standard: "the highest standards of honesty, fidelity, and rectitude." *Matter of Murray*, No. 14-O-00412, 2016 WL 6651388, at *9 (Cal. Bar Ct. Nov. 10, 2016) (suspending Kern County prosecutor's license); *see also Matter of Nassar*, No. 14-O-00027, 2018 WL 4490909, at *10 (Cal. Bar Ct. Sept. 18, 2018) ("[P]rosecutors have an elevated standard of candor and impartiality as compared to other attorneys."); Cal. R. Prof. Conduct 3.8, com. [1] ("A prosecutor has the responsibility of a minister of justice and not simply that of an advocate. This responsibility carries with it specific obligations to see that the defendant is accorded procedural justice."). As such, "[t]o state the obvious, it is a fundamental duty of attorneys to read the legal authorities they cite in appellate briefs or any other court filings to determine that the authorities stand for the propositions for which they are cited." *Noland v. Land of the Free*, 336 Cal. Rptr. 3d 897, 912 (2025) (emphasis omitted).

The District Attorney's conduct is shocking, and as courts across the country have struggled to respond to the increase of citations to fabricated authority due to the widespread use of generative artificial intelligence ("AI"), it stands alone. To Petitioner's knowledge, this is the first instance of a court responding to a case in which a prosecutor has cited to fabricated authority—much less repeatedly—in an attempt to deprive criminal defendants of their constitutional rights. Though some attorneys accused of submitting fabricated citations have responded by denying or minimizing their conduct, to Petitioner's knowledge, none have before threatened retaliatory action against opposing counsel for asking the court to investigate. The District Attorney's conduct must be investigated because the repeated citation to fabricated authority—and subsequent efforts to intimidate opposing counsel from investigating what happened—poses serious threats to the integrity and legitimacy of the criminal system in this state.

Petitioner asks this Court to grant review of the Court of Appeal's interlocutory order denying Petitioner's Motion to Issue an Order to Show Cause Why it Should Not Impose Sanctions against the District Attorney. Cal. R. Ct. 8.500(a)(1). He asks that this Court "transfer[] the matter to the Court of Appeal," Cal. R. Ct. 8.500(b)(4), with directions that it issue an Order to Show Cause, investigate the District Attorney's submission of fabricated authority, and, after appropriate discovery or other proceedings, impose any sanctions necessary to ensure this conduct is not repeated.

STATEMENT OF FACTS

I. The District Attorney Filed a Brief in a Pretrial Habeas Case Citing to Fabricated Authority, Misrepresenting the Record, and Mischaracterizing the Holdings of Real Cases.

The underlying case in which these issues arise is about Kyle Kjoller, a man who the Court of Appeal ultimately agreed was unlawfully incarcerated pretrial in Nevada County in violation of *In re Humphrey*, 11 Cal. 5th 135 (2021). *See* Emergency Petition for Writ of Habeas Corpus ("Pet."); Palma Notice. On September 4, 2025, the District Attorney filed an Informal Response, which he titled "Answer," to Mr. Kjoller's habeas petition in which he asked the Court of Appeal to affirm a pretrial detention order—depriving Mr. Kjoller of "a fundamental interest second only to life itself in terms of constitutional importance." *Van Atta v. Scott*, 27 Cal. 3d 424, 435 (1980). *See* Answer. In it, the District Attorney cited to fabricated authority, misrepresented the record, and mischaracterized the few actual authorities that were accurately referenced, including a provision of the California Constitution.

Of the eight cases cited by the District Attorney in his Answer, three do not exist. Another three do exist but do not stand for the principle the District Attorney claims. There is an additional fabricated case listed in the Answer's Table of Authorities. The six case citations are laid out below.

	Case Cited	**Answer page number**	**Analysis**
1	"*In re Brown*, 6 Cal. 5th 528 (2019)"	9, 10	Case does not exist. Reporter citation does not exist. Does not accurately describe

			existing case *In re Brown*, 76 Cal. App. 5th 296 (2022).
2	"*In Re Brown* [,] 76 Cal. App. 5th 296 (2022)"	4	Case exists, is described inaccurately.
3	"*In re Kowalczyk*, 50 Cal. App. 5th 1017 (2020)"	9, 10	Case does not exist. Reporter citation belongs to *Olabi v. Neutron Holdings Inc.*, a case about arbitration clauses, not criminal law. Does not accurately describe existing case *In re Kowalczyk*, 85 Cal. App. 5th 667 (2022), *review granted* (Mar. 15, 2023).
4	"*Gray v. Superior Court*, 125 Cal. App. 4th 611 (2005)"[1]	9	Case does not exist. Reporter citation does not exist. The case at page 611 of that reporter is *Daun v. USAA Cas. Ins. Co.*, 125 Cal. App. 4th 599, 611 (2005), a case about California's Uninsured Motorist Statute, not criminal law. Principle cited is inapposite to existing case "*Gray v. Superior Court*, 125 Cal. App. 4th 629 (2005)."
5	"*In re Avignone*, 26 Cal. App. 5th 195 (2018)"	9	Case exists. Proposition is inapposite.
6	"*In Re White* 9[,] Cal. 5th 455 (2020)"	4, 9	Case exists, is described inaccurately.

Nor were these fabricated citations limited to cases. The District Attorney repeatedly cited California Constitution article I, section 28(b)(13), first as an authority under which the lower court "evaluated Petitioner's custodial status" (Answer at 9) then as a constitutional provision which "requires courts to weigh

[1] The District Attorney's Table of Authorities lists this citation as "*Gray v. Superior Court*, 125 Cal. App. 4th 622 (2005)." Answer at 3. That reporter citation also does not exist. The case at page 622 of that reporter is *People v. Sorenson*, 125 Cal. App. 4th 612, 622 (2005), which is a direct appeal from a misdemeanor conviction and does not support the principle either.

the protection of victims and the community while preserving the presumption of release" (Answer at 10). Article I, section 28(b)(13) is a real constitutional provision—about restitution. It has nothing to do with pretrial detention or release. *See* Cal. Const. art. I, § 28(b)(13).

II. Petitioner Filed a Motion Asking the Court to Investigate the District Attorney's Citations to Fabricated Authority and Consider Whether to Issue Sanctions.

On September 17, Petitioner filed an Informal Reply ("Reply") raising concerns about the authorities and misrepresentations in the District Attorney's Answer. Petitioner also filed a Motion ("Sanctions Motion") highlighting additional fabricated authorities and misrepresentations in the Answer, including that Deputy District Attorney ("DDA") Madison Maxwell, the named author of the brief, had verified "*under penalty of perjury*" that she had "read this response and kn[e]w its contents" which "were true." Answer at 12 (emphasis added). The number and nature of the errors strongly suggested that the document had been prepared by generative AI and called for an investigation about how they could have occurred in such a significant proceeding.

The Sanctions Motion asked the Court of Appeal to issue an Order to Show Cause and investigate whether it should impose sanctions against the District Attorney, including, if misconduct was found, striking the District Attorney's filing, awarding attorneys' fees to Petitioner's counsel—for their time sifting through fabrications, trying to decipher the mischaracterizations and drafting the Reply and the Motion—and "taking any other action which this Court finds 'the

circumstances of the case and the discouragement of like conduct in the future may require.'" Sanctions Motion at 4-5 (citing *Jones v. Superior Court*, 26 Cal. App. 4th 92, 96 (1994) (citing Cal. R. Ct. 26(a))).

III. The District Attorney's Office Called Petitioner's Trial Counsel, Claimed the Fabricated Authorities Were Real Lower Court Opinions, and Threatened To Take Disciplinary Action if He Did Not Withdraw the Motion.

On September 18, DDA Maxwell and her supervisor, Assistant District Attorney ("ADA") Lydia Stuart, called Petitioner's trial counsel, Assistant Public Defender ("APD") Thomas Angell, and asked him to withdraw the Motion for Sanctions. Second Motion Attach. A ¶ 6. ADA Stuart initially claimed that the fabricated authorities in the District Attorney's response were real lower court decisions. *Id.* When APD Angell pointed out that many of the case names and reporter citations did not match and several of the reporter citations were to irrelevant civil cases, ADA Stuart claimed those cases were mistakenly cited because DDA Maxwell was going too fast in her research. *Id.* At the conclusion of the call, ADA Stuart suggested that Petitioner's counsel may be vulnerable to disciplinary action for filing a sanctions motion without a good faith basis for doing so. *Id.*

IV. The Court of Appeal Denied the Motion Without Explanation.

On September 19, the Court of Appeal denied the Sanctions Motion without explanation. Sept. 19 Order.

V. The District Attorney Filed an Extra Brief Denying That He Had Cited to Fabricated Authority.

On September 23, without invitation or seeking permission from the Court of Appeal, the District Attorney filed an additional brief responding to Petitioner's Informal Reply. *See* Respondents [sic] Response to Petitioner's Informal Reply ("Sept. 23 Filing"). The filing did not express regret for or otherwise acknowledge that his Answer contained fabricated authority. Instead, the District Attorney doubled down on semantics: "Petitioner raises claims in their Informal Reply that Respondent cited to multiple fake cases. This is untrue. There are errored citations; however, the errored citations belong to real cases." *Id.* at 4. The District Attorney characterized the fabricated citations as scrivener's errors, and offered puzzling explanations for "[e]ach case" of misrepresented authority "that Petitioner addresses in their Informal Reply." *Id.* The filing did not address multiple improper citations that Petitioner raised in his Sanctions Motion.

VI. DDA Maxwell Told Undersigned Counsel That the Citations to Fabricated Authority Were Scrivener's Error and Not Generated By Artificial Intelligence, and That By Citing to Cases She Had Not Represented That Their Holdings Supported the Legal Proposition in the Preceding Sentence.

In an attempt to clarify the District Attorney's position, undersigned counsel spoke with DDA Maxwell on the phone the morning of September 24.

DDA Maxwell claimed that, in the Answer, she had cited only real cases that she had been reading for other matters, and, because she had them open in different browser tabs on her computer, she had mixed up the names and reporter citations. Second Motion Attach. A ¶ 10. As Petitioner explained in his

Reply and Sanctions Motion, the mismatched reporter citations include civil cases about arbitration clauses and California's Uninsured Motorist Statute. Reply at 8; Sanctions Motion at 6-7, 9.

Undersigned counsel also asked if DDA Maxwell could explain the additional citations Petitioner's counsel raised in the Sanctions Motion which were not addressed in the District Attorney's September 23 filing, namely a string cite: "*Gray v. Superior Court*, 125 Cal. App. 4th 611 (2005)"; "*Bennett v. Superior Court*, 39 Cal. App. 5th 862 (2019)"; and "*In re Avignone*, 26 Cal. App. 5th 195 (2018)." Second Motion Attach. A ¶ 11. As Petitioner explained in his Sanctions Motion, the first case—*Gray*—is not an existing citation, and the actual case *Gray v. Superior Court*, 125 Cal. App. 4th 629 (2005) says exactly the opposite of what the District Attorney claimed in his Answer. Sanctions Motion at 9. *Avignone* exists, but is also inapposite. *Id*. at 10.

DDA Maxwell responded that she had not included the string cite as legal authority for the preceding sentence. Second Motion Attach. A ¶ 11. Instead, she said, she was merely providing case law unconnected to the sentence before it because she did not know what the court should do, and wanted the court to figure it out. *Id*.

Finally, DDA Maxwell clarified that she understood the comment that her supervisor, ADA Stuart, had made during the September 18 call—that Petitioner's counsel had violated an ethical rule by filing the Sanctions Motion without a good faith basis for doing so—to be a reference to Petitioner's counsels' allegation that

the Answer had include fake cases because it was generated by AI, which she denied. Second Motion Attach. A ¶ 12. Petitioner's Sanctions Motion discussed cases involving AI-generated fabricated authority and said that, because the circumstances "suggest[ed]" that portions of the brief, including citations to fabricated authority were "written by generative AI" (Sanctions Motion at 7), "[p]resumably . . . the District Attorney used" generative AI "to draft the brief, then did not review it before filing" (*id.* at 4), and asked the court to investigate by issuing an Order to Show Cause. The Sanctions Motion did not claim definitively this is what happened. How the citations came to be included in the District Attorney's brief is precisely what Petitioner asked the Court of Appeal to investigate.

Undersigned counsel sent an email to both ADA Stuart and DDA Maxwell memorializing the conversation and asking them to correct any inaccuracies or omissions. Second Motion Attach. B.

VII. ADA Lydia Stuart Affirmed DDA Maxwell's Explanation for the Fabricated Citations and Again Threatened Petitioner's Counsel with Disciplinary Action if They Continued to Ask the Court of Appeal to Investigate.

On September 30, ADA Stuart responded to Petitioner's counsel's emails memorializing both phone conversations and confirming they accurately "reflect the spirit of [the District Attorney's] position." Second Motion Attach. B. She again characterized the fabricated authorities in the District Attorney's Answer as "inadvertent errors" and suggested that Petitioner's counsel had committed misconduct under the Code of Civil Procedure, Rules of Professional Conduct,

and Business and Professions Code by filing the Motion. *Id.* ADA Stuart stated that Petitioner's claim in his Sanctions Motion that the District Attorney's "filing contained 'hallucinated holdings' and was 'so obliquely [sic] and misleading as to suggest the entire argument was written by generative AI [sic]' itself strikes as a misleading characterization to the court." *Id.* "Although the Court has already resolved this matter," ADA Stuart "caution[ed]," any future similar motions brought by Petitioner's counsel "may warrant closer scrutiny." *Id.*

VIII. The Nevada County District Attorney's Office Had Previously Filed Briefs Citing to Fabricated Authority in at Least Two Other Cases, and Been Put "On Notice" by the Trial Court to be Careful When Using AI to Draft Briefing.

i. *People v. Kalen Turner*, Nevada County Sup. Ct. No. CR0006300B

After filing the initial September 17 request that the Court of Appeal investigate the District Attorney's citations to fabricated authority, undersigned counsel learned that this is not the first case in which the District Attorney has filed a brief containing fabricated authority in recent weeks. Nor is it the first case involving fabricated authority where ADA Stuart has directly intervened.

Less than three weeks before the District Attorney filed his Answer in this case, he filed an opposition to a motion to suppress in *People v. Kalen Turner*, Nevada County Sup. Ct. No. CR0006300B. Second Motion Attach. C. That filing also contained fabricated authority. In the section labeled "ARGUMENT," running from pages 6-10, the District Attorney provides citations to real cases with fictitious quotes. The italicized language the District Attorney claimed to be

quotes from *People v. Medina*, 110 Cal. App. 4th 171 (2003); *People v. Jones*, 228 Cal. App. 3d 519 (1991); *People v. Letner and Tobin*, 50 Cal. 4th 99 (2010); and *People v. Limon*, 17 Cal. App. 4th 524 (1993) do not appear in those opinions. Nor do they, to Petitioner's counsel's knowledge, appear in any other case: when undersigned counsel searched the language in quotation marks in Westlaw, each quote returned zero results. Second Motion Attach. A ¶ 16. The quotations appear to be completely made up.

The District Attorney's description of the facts of those cases, too, is inaccurate. And at least one case, *People v. Medina*, 110 Cal. App. 4th 171 (2003), stands in direct opposition to the proposition the District Attorney asserts.

After the superior court judge apparently raised concerns about the fabricated authorities *sua sponte*, ADA Stuart appeared in court herself on the matter, advising the judge that the DDA who authored the brief was sick. *See* Second Motion Attach. D. When questioned by the court, ADA Stuart did not acknowledge that the brief had contained fabricated authority, only admitting that the case law "is not on point," and said she had "no further information at this time as to how it wound up in the brief." *Id.* at 4:13-15. ADA Stuart told the court that it should disregard the brief, which would be "followed up upon." *Id.* at 4:17. Though ADA Stuart had not admitted the fabricated authorities were AI-generated, the court responded that it appeared to be the product of AI and that everyone needed to "be on notice about and careful" about the use of artificial intelligence to draft briefing. *Id.* at 4:26-5:2. "We do agree with that," ADA Stuart

said. *Id.* at 5:3. The District Attorney filed his Answer citing to fabricated authority in this case one week later.

ii. *People v. Taylor Anthony Hiles McGrath*, Nevada County Sup. Ct. No. CR0005340

After filing Petitioner's October 2 Motion (*see infra* section IX), undersigned counsel learned of a *third* brief the District Attorney has filed citing to fabricated authority, also signed by DDA Maxwell, this time an opposition to a defendant's request for mental health diversion in the trial court. *See* Request for Judicial Notice. That brief was dated August 13. *Id.* Attach. A. Many of the errors in the brief are strikingly similar to those in the brief filed in this case: mismatched case names and reporter citations, inaccurate descriptions of existing cases, and even citations to the wrong provision of article I, section 28 of the California Constitution. *Id.* Attach. A at 9-10. Unlike the District Attorney's Answer in this case, however—which contained no citations from any case in its argument section—this brief also contained fabricated quotes. *Id.* at 5-11. As with the District Attorney's brief in *Turner*, a Westlaw search indicated that the "quotes" did not appear in the cases cited by the District Attorney or in any other cases. *Id.*

IX. Petitioner Filed a Second Motion Asking the Court of Appeal to Investigate the District Attorney's Citations to Fabricated Authority and Consider Issuing Sanctions.

On October 2, Petitioner filed a Second Motion asking the Court of Appeal to issue an Order to Show Cause why it should not impose sanctions against the District Attorney for the Office's citations to fabricated authorities in light of: its

September 23 filing denying it had done so and failing to correct multiple misstatements to the court; ADA Stuart and DDA Maxwell's implausible explanations for the source of the challenged citations and threats to Petitioner's counsel; and the fact that the Office had, just weeks before, filed another brief citing to fabricated authority and had been admonished by the trial court to be cautious in their use of artificial intelligence. The Motion did not include the third brief the District Attorney's Office had filed citing to fabricated authority, in *People v. McGrath*, of which Petitioner's counsel was not yet aware.

X. The Court of Appeal Denied the Second Motion Without Explanation.

On September 29, the Court of Appeal issued a *Palma* Notice agreeing that the lower court had ordered Mr. Kjoller detained in violation of *Humphrey*. *See* Palma Notice. In response, the superior court granted Mr. Kjoller a new bail hearing. On October 20, the Court of Appeal dismissed his habeas petition as moot and denied Petitioner's Second Motion without explanation. *See* Attachment A, Court of Appeal Order Denying Motion.

ARGUMENT

I. The District Attorney's Explanations For the Citations in His Answer Defy Credulity.

The District Attorney's attempts to justify his citations to fabricated authority defy credulity. His explanations for each of the challenged citations, as

well as how they came to be included in the brief in the first place, are addressed in turn below.[2]

(1) "*In re Brown*, 6 Cal. 5th 528 (2019)." This is fabricated authority.

i. District Attorney's Answer

"In *In re Brown*, 6 Cal. 5th 528 (2019), the Supreme Court held that pretrial detention may be justified when prior convictions, ongoing unlawful conduct, and demonstrable community threats exist." Answer at 10.

ii. Petitioner's Reply and Sanctions Motion

In his Reply and Sanctions Motion, Petitioner explained that this was fabricated authority. Reply at 6-7; Sanctions Motion at 5-6, 7-8. There is no such Supreme Court case. There is a real case discussing pretrial detention with the same name—but different citation and from a different court—*In re Brown*, 76 Cal. App. 5th 296 (2022). While that case mentions the requirement from

[2] The District Attorney also claimed in his Answer, without providing any citation to the record, that the lower court "explicitly considered Petitioner's proposed GPS monitoring, probation reporting, and property searches." Answer at 10. The lower court did no such thing: though it found, generally that "there are no less restrictive alternatives [to Mr. Kjoller's detention] that would provide for community safety," it did not specify which, if any, less restrictive alternatives it had evaluated let alone "explicitly consider[ing]" those Petitioner's counsel had proposed. *See* Pet. Ex. H at 15:13-16:28. Under *Yedinak v. Superior Court of Riverside County*, 92 Cal. App. 5th 876, 885 (2023), whether or not the lower court made an explicit explanation of which less restrictive alternatives it considered is the dispositive issue for Petitioner's *Humphrey* claim, and it was discussed at length in his habeas petition. *See* Pet. at 20-26. Indeed, the Court of Appeal ultimately issued a *Palma* Notice on those exact grounds. *See* Palma Notice. Though it is not fabricated authority, the District Attorney's misrepresentation about the trial court's record raises further questions about whether, and how closely, he read the transcript and the Answer before filing.

Humphrey and Penal Code section 1275 that courts consider public safety and prior convictions when making pretrial release decisions, the above passage from the District Attorney's Answer is not the holding of *Brown* or even reasonably related to it. Moreover, to Petitioner's knowledge, no court has ever discussed "ongoing unlawful conduct" in those terms. Sanctions Motion at 6.

iii. District Attorney's September 23 Filing

The District Attorney's September 23 filing does not address this fabricated citation at all beyond claiming that "[b]oth *In re Brown* and 6 Cal.5th 528 (2019) are in fact real cases." Sept. 23 Filing at 4. In fact, there is no case with the citation "6 Cal. 5th 528 (2019)." As Petitioner explained, there is a case, *In re B.M.*, with the citation "6 Cal. 5th 528 (*2018*)." Sanctions Motion at 5-6 (emphasis added). That case—a California Supreme Court decision holding that a butter knife, as used by a defendant, did not qualify as a deadly weapon—does not mention pretrial detention at all. *In re B.M.*, 6 Cal. 5th 528 (2018). In his September 23 filing, the District Attorney says the description above is about the actual *In re Brown*, and not the case at "6 Cal. 5th 528 (2019)." Sept. 23 Filing at 4-5. But the District Attorney neither corrects nor explains why, if he had intended to cite to the real Court of Appeal decision *In re Brown*, 76 Cal. App. 5th 296 (2022), he referred to it as a "Supreme Court" opinion. *See* Answer at 10. Nor does he correct or explain why he misstated the holding of *Brown* or what in the *Brown* opinion he referred to as "ongoing unlawful conduct." *Id.*

(2) "*In re Kowalczyk*, 50 Cal. App. 5th 1017 (2020)." This is

fabricated authority.

i. District Attorney's Answer

"*In re Kowalczyk*, 50 Cal. App. 5th 1017 (2020), confirmed that courts may rely on community members [sic] safety when consistent with investigative findings." Answer at 10.

ii. Petitioner's Reply and Sanctions Motion

In his Reply and Sanctions Motion, Petitioner highlighted that this was fabricated authority. Reply at 8; Sanctions Motion at 6-7, 8. The reporter citation "50 Cal. App. 5th 1017" belongs to *Olabi v. Neutron Holdings Inc.*, which held that an electric vehicle servicer's civil suit against their employer was not barred by an arbitration agreement. It has nothing to do with pretrial detention, public safety, "investigative findings" or, indeed, criminal law. There is a real case with the same name, *In re Kowalczyk*, 85 Cal. App. 5th 667 (2022), *review granted* (Mar. 15, 2023), but, as Petitioner explained, it contains no discussion of anything that could fairly be construed as "investigative findings." Sanctions Motion at 6-7.

iii. District Attorney's September 23 Filing

Here, again, the District Attorney claims that "[*In re Kowalczyk*,] 50 Cal. App. 5th 1017 (2020)" is not a "fake case" because, as Petitioner explained in his Reply and Sanctions Motion, "[b]oth *In re Kowalczyk* and 50 Cal. App. 5th 1017 (2020) are in fact real cases." Sept. 23 Filing at 5. The description in his Answer, he says, is of the actual *In re Kowalczyk*, and not the case discussing arbitration

agreements. *Id.* He denies that he gave a misleading description of the actual *Kowalczyk*, claiming that by "investigative findings" he was referring to "the court's review of a defendant's RAP sheet, the facts of the case, victim and public safety, and the offenses charged . . . as they are hearing argument, assessing documents, and hearing statements from the community and/or victims when assessing bail." *Id.*

(3) "Cal. Const. art. I § 28(b)(13)."

i. District Attorney's Answer

The District Attorney cites to article I, section 28(b)(13) twice in his Answer, first, as an authority under which the trial court allegedly evaluated Petitioner's request for release: "The trial court evaluated Petitioner's custodial status under Penal Code §1275, Cal. Const., Art. I, §12(b), and Art. I, §28(b)(13), considering statutory factors, prior criminal history, the seriousness of current charges, and credible community safety concerns." Answer at 9. He later describes the provision as: "Cal. Const., Art. I, §28(b)(13) requires courts to weigh the protection of victims and the community while preserving the presumption of release." Answer at 10.

ii. Petitioner's Reply and Sanctions Motion

In his Reply and Sanctions Motion, Petitioner explains that 28(b)(13) is a real California state constitutional provision. Reply at 10-11; Sanctions Motion at 10. But it governs post-conviction restitution and has nothing to do with pretrial detention or money bail. *Id.*

iii. District Attorney's September 23 Filing

In his September 23 filing, the District Attorney acknowledges that section 28(b)(13) is an irrelevant constitutional provision and claims that he—twice—made a typo, intending to refer to Cal. Const. art. I, § 28(b)(3). Sept. 23 Filing at 5-6.

This is puzzling. Section 28(b)(3) narrowly addresses the right of victims to have their safety considered in setting bail and release conditions—something the District Attorney's Answer does not mention. Section 28(b)(3) does not require courts to consider "prior criminal history, the seriousness of current charges, [or] credible community safety concerns" beyond the safety of the individual victim. Answer at 9. Nor does it make any mention of "preserving the presumption of release" for criminal defendants. Sept. 23 Filing at 10. These requirements are all enshrined instead in article I, section 28(f)(3), the state constitutional provision titled "Public Safety Bail."

(4) "*In Re Brown* [sic] 76 Cal. App. 5th 296 (2022)." This is a real case.

i. District Attorney's Answer:

> [Petitioner] further fail[s] to acknowledge the authority, detailed in *In Re Brown* 76 Cal. App. 5th 296 (2022), of courts to deny bail pursuant [to] Article I, Sections 12 and 28(f)(3), [sic] of the California Constitution when "'detention is necessary to protect victim or public safety, or ensure the defendant's appearance, and there is clear and convincing evidence that no less restrictive alternative will reasonably vindicate those interests.' [sic] *Id.* at 308 quoting *In re Humphrey* 11 Cal. 5th 135 (2021). Notably, *In Re Brown* and *In re Humphrey* were

both decided after *In Re White* 9 Cal. 5th 455 (2020), upon which Petitioner relies.

Answer at 4.

ii. Petitioner's Reply and Sanctions Motion:

In his Reply and Sanctions Motion, Petitioner highlighted both claims as misleading. Reply at 6-8; Sanctions Motion at 5-6, 7-9. First, *Brown* does not discuss the authority of courts to deny bail pursuant to article I, sections 12 and 28(f)(3) of the California Constitution. Second, *no court* has ever found that section 28(f)(3) permits detention *at all,* much less outside the narrow confines of section 12.[3] Third, *Brown*, which is a Court of Appeal decision, could not have

[3] The section 12 requirements are defined in *In re White*, 9 Cal. 5th 455 (2020) and place additional limitations on pretrial detention beyond those required by due process. Under *Humphrey*, 11 Cal. 5th at 156, due process permits detention only where "there is clear and convincing evidence that no less restrictive alternative" will reasonably "protect victim or public safety, or assure the accused's return to court." Section 12 guarantees all defendants not within a narrow set of exceptions "the right to release on bail," a protection overlapping but distinct from the rights described in *Humphrey*. Petitioner understood the District Attorney's argument to be that *Brown* held that the *Humphrey* findings alone were sufficient to justify detention. *Humphrey* said the opposite: that while due process findings are necessary, they are not sufficient to justify detention since courts must also ensure that detention complies with "state statutory and constitutional law specifically addressing bail." *Humphrey*, 11 Cal. App. 5th at 155. In a footnote, this Court confirmed that the "state . . . constitutional law" referenced was section 12's right to bail, but deferred ruling on whether section 12 remained in effect. *Id.* at n.7. In *Brown*, the Court of Appeal held that *Humphrey* forbids unaffordable money bail in all cases and requires courts to either detain a defendant transparently without bail or release them on attainable conditions. 76 Cal. App. 5th at 298-299. *Brown* did not expand the circumstances under which courts may detain beyond *Humphrey* or authorize detention without bail outside section 12. *See generally*, *id*. Nor could it, as Courts of Appeal cannot overrule this Court's precedent.

overturned or altered the decision of the California Supreme Court in *White*.

iii. District Attorney's September 23 Filing

The District Attorney says Petitioner's counsel "misconstrued" this paragraph. Sept. 23 Filing at 6. The District Attorney claims he did not argue "that Cal. Const. art. I, § 28(f)(3) permit [sic] detention outside of Cal. Const. art., I, § 12" and says that he only "mentions Petitioner's lack of acknowledgement of Cal. Const. art. I, §28(f)(3) and Cal. Const. art. I, §28(b)(3) because it [sic] is a consideration to be made when assessing bail and is certainly relevant to the instant case." *Id.* He justifies the inaccurate statement that *Brown* "detail[s]" the "authority . . . of courts to deny bail to deny bail pursuant [to] Article I, Sections 12 and 28(f)(3)" (Answer at 4) of the California Constitution by saying that "the court in *In re Brown* listed these provisions under a section titled 'a. Pertinent constitutional and statutory provisions.'"[4] Sept. 23 Filing at 5 (citing *Brown*, 76 Cal. App. 5th at 302-303). Finally, the District Attorney addresses his statement that *Brown*—which he had described in the preceding sentence as authorizing courts to detain people without bail under broader circumstances than those permitted in *White*—was "notably" decided after *White*. *See* Answer at 4. This statement, he says, "by no means . . . suggest[ed] that the court's opinion in *In re Brown* overruled the California Supreme Court's opinion in *In re White* 9 Cal. 5th

[4] This is a real section in the real *Brown* opinion. Notably, it does not mention section 28(b)(3) at all, which makes the District Attorney's claim that he intended to cite to that provision—rather than 28(f)(3)—throughout the entirety of his Answer's "Argument" section all the more puzzling.

455 (2020). . . . Respondent merely cited *In re Brown* along with *In re White* as it is an important case to consider in the line of case law that addresses bail." Sept. 23 Filing at 5.

(5) Omissions in the District Attorney's September 23 Filing.

The District Attorney's September 23 Filing did not address other concerns that had been raised in the Sanctions Motion, including:

i. DDA Maxwell's declaration "under penalty of perjury" that she had read the Answer, and, on information and belief, alleged its contents to be true (Answer at 12; Sanctions Motion at 4);

ii. The District Attorney's citation to "*Gray v. Superior Court*, 125 Cal. App. 4th 611 (2005)," a fabricated case (Answer at 9; Sanctions Motion at 9);

iii. The additional misleading citations highlighted in Petitioner's Sanctions Motion. *See* Sanctions Motion at 8-9 (District Attorney's Answer includes woefully incomplete description of *In re White*, 9 Cal. 5th 455 (2020) and cites *In re Avignone*, 26 Cal. App. 5th 195 (2018) for a completely inapposite principle).

(6) The Source of the "Errored Citations"

Though the District Attorney has not addressed the source of the fabricated authorities directly with any court, [5] ADA Stuart and DDA Maxwell's explanations

[5] The District Attorney's Office similarly did not explain the sources of the fabricated authority—or even acknowledge that its brief had contained fabricated

to Petitioner's counsel are puzzling and require factual resolution. The fabricated authorities are manifestly not real lower court opinions, as ADA Stuart initially claimed. DDA Maxwell's claim that she—three separate times—fabricated the mismatched citations herself from open browser tabs, while possible, is unlikely but knowable with basic investigation. DDA Maxwell's claim that, by citing to cases without any explanatory parentheticals, she was not asserting that those cases supported the proposition in the sentence preceding them is also concerning in that it deviates from convention that any lawyer would know and presumably apply to their own writing. *See* The National Conference of Law Reviews, *The Bluebook: A Uniform System of Citation*, B1.1 (22nd ed. 2025) ("In non-academic legal documents, such as briefs and opinions, citations generally appear within the text of the document immediately following the propositions they support."); *Id.* at B1.2 (Where the citation to an authority is unaccompanied by an introductory signal, the citation indicates that "[t]he authority directly states a proposition, is the source of a quotation, or was mentioned in the proposition."). These explanations are even more suspect in light of the two other briefs the District Attorney's Office filed citing to fabricated authority which additionally contain fabricated quotations.

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authority—in *Turner*, even in the face of the trial court's explicit suggestion that the brief had been generated by AI. Instead, ADA Stuart characterized the fabricated authority as only "not on point" and said she "ha[d] no further information at this time as to how it wound up in the brief." Second Motion Attach. D at 4:13-15.

II. This Court Needs to Take Action to Ensure the Integrity of the Judicial System.

It would be troubling, even alarming, if the District Attorney cited fabricated authority in a single case, even if the District Attorney were to promptly correct the errors and accept responsibility. As the First District Court of Appeal recently explained in a case where appointed criminal defense counsel cited fabricated authority—then admitted the violation, informed his client, and withdrew as counsel—such cases are "particularly disturbing because it involves the rights of a criminal defendant, who is entitled to due process." *People v. Alvarez,* No. D084581, 2025 WL 2814789, at *2 (Cal. Ct. App. Oct. 2, 2025). But this Court is presented with a different situation entirely, where the *District Attorney's Office*—for at least the *third* time—has filed a brief with fabricated authorities, and—for at least the *second* time—has failed to acknowledge it. In this case, it instead responded by making questionable new factual claims; declining to correct the errors; minimizing or misrepresenting its conduct; and suggesting the risk of ethical consequences for Petitioner's counsel if they did not withdraw, or if they renewed, their Motion asking the Court of Appeal to investigate. As Petitioner said in his initial Motion, although dozens of courts across the country have addressed the submission of fabricated authority, to undersigned counsel's knowledge, none have addressed an instance of a prosecutor doing so. None, to Petitioner's knowledge, have addressed an instance where an office has cited to fabricated authority in multiple cases (including fabricated citations, quotes, and holdings). And none, to Petitioner's knowledge,

have addressed an instance of an attorney responding to an allegation that they had submitted fabricated authority by "caution[ing]" they might take disciplinary action against opposing counsel for bringing it to the attention of the court. *See* Second Motion Attach. B.

Whether the District Attorney has filed, has a pattern of filing, or has taken inadequate steps to prevent the filing of fabricated authority is a matter of the utmost public interest. Prosecutors have an enormous amount of power over the lives of ordinary people and, as a result, are held to higher standards of candor than all other attorneys. *Nassar*, 2018 WL 4490909, at *10 ("[P]rosecutors have an elevated standard of candor and impartiality as compared to other attorneys."); *see also* Sanctions Motion at 3-4 (collecting cases). Violating that duty of candor—whether through intentional deceit or negligence—imperils the legitimacy of the criminal legal system. That is because of the very real risk that a court may rely on a prosecutor's misrepresentation in its ruling. Indeed, the Court of Appeal's *Palma* Notice in this case seemed to invoke the mischaracterizations found in the District Attorney's Answer. Mr. Kjoller had been ordered detained without bail, despite the fact that, because of his nonviolent charges, and because the superior court did not make the requisite findings guilt and dangerousness, he had the right to release on bail under article I, section 12 of the California Constitution. Although no court has ever held that courts may detain defendants without bail outside of section 12, in the *Palma* Notice, the Court of Appeal wrote that "[t]o the extent petitioner contends that

respondent court was required to" find Mr. Kjoller did not have the right to release on bail under section 12 "before ordering that he be detained" without bail, "there is relevant case law to the contrary." Palma Notice at 1. The "relevant case law" the Court of Appeal offered was:

> (*Humphrey, supra,* 11 Cal.5th at p. 143; see also *In re Kowalczyk* (2022) 85 Cal.App.5th 667, 689, review granted Mar. 15, 2023, S277910 [holding that a superior court may detain an arrestee by setting unaffordable bail where it makes the requisite findings under *Humphrey*]; *In re Brown* (2022) 76 Cal.App.5th 296, 305-306 [holding that a superior court may detain an arrestee by denying bail where it makes the requisite findings under *Humphrey*].).

Id. at 2. In his Answer, the District Attorney's mischaracterized these cases as holding that the *Humphrey* findings are sufficient to deny bail under the state constitution, without regard for section 12. *See supra* section I.4 (discussing the District Attorney's mischaracterization of *Brown* and *Humphrey* on this point). In fact, both *Humphrey* and *Kowalczyk* made explicit that the *Humphrey* findings were necessary, but *not sufficient* to deny bail under section 12. *Humphrey*, 11 Cal. 5th at n.7; *Kowalczyk*, 85 Cal. App. 5th at 682-685 (discussing section 12's limitations on the denial of bail). The question left open after *Humphrey*—and answered in the affirmative by the Court of Appeal in *Kowalczyk*—was whether section 12 continued to limit the denial of bail in noncapital cases or whether it had been silently repealed.

It is not clear whether the Court of Appeal's error was influenced by the District Attorney's misrepresentations, but it is deeply concerning, particularly in light of the additional misleading briefs the District Attorney has filed in the trial

court. Although the use of AI may not be, in and of itself, misconduct, using AI to generate briefing without carefully cite checking the drafts *often will result in* the citation of fabricated authorities, which is misconduct. That is because, depending on the model, AI hallucinates when answering legal questions between 17% and 82% of the time. *See* Magesh, V., Surani, F., Dahl, M., Suzgun, M., & Ho, D.E., *Large Legal Fictions: Profiling Legal Hallucinations in Large Language Models*, Journal of Legal Analysis 16:64, 66 (2024) (finding general purpose LLMs, like ChatGPT, hallucinate on legal queries between 58% and 88% of the time); Magesh, V., et al., *Hallucination-Free? Assessing the Reliability of Leading AI Legal Research Tools*, Journal of Empirical Legal Studies 22:216-242 (2025) (LexisNexis and Westlaw's AI research tools hallucinated between 17% and 33% of the time and provide incorrect or incomplete answers 35% to 58% of the time). As one federal court warned: "Plaintiff's use of AI affirmatively misled me. I read their brief, was persuaded (or at least intrigued) by the authorities that they cited, and looked up the decisions to learn more about them – only to find that they didn't exist. That's scary. It almost led to the scarier outcome (from my perspective) of including those bogus materials in a judicial order. Strong deterrence is needed to make sure that attorneys don't succumb to this easy shortcut." *Lacey v. State Farm Gen. Ins. Co.*, No. CV 24-5205 FMO (MAXX), 2025 WL 1363069, at *5 (C.D. Cal. May 5, 2025) (striking the offending brief and ordering offending counsel to pay opposing counsel $31,100). In criminal cases, this can have horrific, life-shattering results.

That concern is amplified by the fact that both here and in *Turner*, the fabricated authorities were caught by someone outside the District Attorney's or Public Defender's Offices. The grave reality is that neither the Public Defender's Office—which is appointed to the lion's share of the criminal cases in Nevada County but has a budget less than half that of the District Attorney's Office—or an overburdened trial court bench have the resources to shepardize every case in every one of the District Attorney's filings. The District Attorney's repeated citations to fabricated authority is a recipe for disaster.

That risk is *further* compounded by the fact that the District Attorney's Office is apparently not treating its repeated submission of fabricated authority as an urgent problem—or, indeed, acknowledging it at all. The District Attorney's response echoes that of the attorney sanctioned in *United States v. Hayes*, 763 F. Supp. 3d 1054 (E.D. Cal. 2025), who likewise filed a brief pairing a real case name with an unrelated reporter citation[6] (*id.* at 1065), later conceded citation errors (*id.* at 1058) but insisted the case name was genuine (*id.* at 1060) and his description accurately described an existing case (*id.* at 1058); and ultimately blamed the mistake on drafting "hastily" (*id.* at 1066). Ultimately, the court

[6] The court in *Hayes* explained that this is the hallmark of an artificial intelligence hallucination. *See Hayes*, 763 F. Supp. 3d at 1065 (a "marking of hallucinated case created by generative artificial intelligence (AI) tools such as ChatGPT and Google" is "look[ing] like a real case with a case name; a citation to the Federal Supplement, which is the reporter that publishes opinions from federal district courts; identification of a district court; and the year for the decision," but, "[i]n actuality, the [reporter] citation . . . is for a different case.").

ordered the attorney to personally pay monetary sanctions and ordered the clerk of court to send the sanctions order to all state bars to which he belonged, as well as to all district and magistrate judges in the district. *Id.* at 1073.

Courts around the country routinely cite *Hayes* as one of the most egregious examples of AI-related misconduct, not because of the initial citation to a hallucinated case, but the attorney's failure to accept responsibility for and correct his mistake after the fact. *See Garner v. Kadince, Inc.*, 571 P.3d 812, 816 (Utah Ct. App. 2025) (limiting sanctions for citing hallucinated cases to payment of costs, attorneys' fees, and a charitable donation where attorney admitted violation and accepted responsibility, rather than, as in *Hayes*, "continue[] to claim that the fake precedent was simply an 'inadvertent citation error.'" (citing *Hayes*, 763 F. Supp. 3d at 1067)); *Wadsworth v. Walmart Inc.*, 348 F.R.D. 489, 497 (D. Wyo. 2025) (limiting sanctions for citing hallucinated cases to revocation of attorney's pro hac vice admission and monetary sanctions because, unlike in *Hayes*, the attorneys had "been forthcoming, honest, and apologetic about their conduct" and "took steps to remediate the situation prior to the potential issuance of sanctions").

The District Attorney's conduct raises serious questions about the integrity of the criminal legal system in Nevada County and beyond. Directing the Court of Appeal to issue an Order to Show Cause will permit badly needed investigation. If there are questions of material fact, the court is empowered to appoint a referee to make suggested factual findings. *See, e.g.*, *Wilson v. Eu*, 54 Cal. 3d 471, 473-

474 (1991) (appointing referee in mandate proceeding to hear matter, employ counsel, experts, and other personnel to assist, with court's approval, and make report and recommendation to court); *Holt v. Kelly*, 20 Cal. 3d 560, 562 (1978) ("Since appellate courts are not equipped to take evidence, a reference is essential when the determination of controverted issues of fact becomes necessary in an original proceeding."); *see also* Cal. Code Civ. Proc. §§ 638-640 (outlining procedures for appointment of referee(s)). Without an Order to Show Cause, the Court cannot know with certainty the source of the fabricated authority or how widespread that source is within the District Attorney's Office. What is clear already is that, regardless of how they came to be, the District Attorney filed citations to fabricated authority and has not corrected them. Subsequently, the District Attorney has provided confusing, implausible, contradictory explanations for this conduct within weeks of being warned of the issue by another court *sua sponte*. Finally, the District Attorney has threatened opposing counsel with the possibility of disciplinary action in what Petitioner's counsel reasonably interprets as an attempt to get them to stop asking the Court of Appeal to investigate.

This Court has a fundamental duty to assure the integrity of the judicial system and that criminal defendants are afforded due process. *Alvarez*, 2025 WL 2814789, at *2; *see also* Cal. Code Jud. Ethics, cannon 3D(2) (a judge "shall take appropriate corrective action" whenever she "has personal knowledge, or concludes in a judicial decision, that a lawyer has committed misconduct"). It

should direct the Court of Appeal to act swiftly to investigate the District Attorney's submission of fabricated legal authority and take any action necessary to "guard against" future incidents. *Noland*, 336 Cal. Rptr. 3d at 915.

Dated: 10/30/2025

Respectfully submitted,

/s/ Carson White

Carson White
Civil Rights Corps
Attorney for Kyle Kjoller

CERTIFICATE OF WORD COUNT

Counsel for Petitioner hereby certifies that this brief consists of 8,214 words (excluding cover page information, tables, proof of service, signature blocks, and this certificate), according to the word count of the computer word-processing program.

Dated: 10/30/2025

Respectfully submitted,

/s/ Carson White
Carson White
Attorney for Kyle Kjoller

ATTACHMENT A

IN THE

Court of Appeal of the State of California

IN AND FOR THE

THIRD APPELLATE DISTRICT

KYLE KJOLLER,
Petitioner,
v.
THE SUPERIOR COURT
OF NEVADA COUNTY,
Respondent;
THE PEOPLE,
Real Party in Interest.

C104445
Nevada County
No. CR0005981

BY THE COURT:

Petitioner's successive motion to issue an order to show cause why this court should not impose sanctions is denied.

The superior court having complied with this court's order of September 29, 2025, the petition for writ of mandate is dismissed as moot.

HULL, Acting P.J.

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cc: See Mailing List

IN THE

Court of Appeal of the State of California

IN AND FOR THE

THIRD APPELLATE DISTRICT

MAILING LIST

Re: Kjoller v. The Superior Court of Nevada County
C104445
Nevada County Super. Ct. No. CR0005981

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S293723

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

KYLE KJOLLER, Petitioner, v. SUPERIOR COURT OF NEVADA COUNTY, Respondent; PEOPLE OF THE STATE OF CALIFORNIA; Real Party in Interest.	No. _____ Third District Court of Appeal No. C104445 Nevada County Sup. Court No. CR0005981

PROOF OF SERVICE

I, Ruby Yearling, declare:

I am over 18 years old and not a party to this action. On October 30, 2025 I served the attached Petition for Review and Request for Judicial Notice and Proposed Order on the following parties electronically via TrueFiling:

Superior Court of Nevada County
nccriminalfile@nccourt.net

Nevada County District Attorney's Office
district.attorney@co.nevada.ca.us

Office of the Attorney General of the State of California
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I declare under penalty of perjury according to the laws of the State of California that the foregoing is true and correct.

Dated: October 30, 2025 *_/s/ Ruby Yearling_*

Ruby Yearling

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **Kyle Kjoller v. Superior Court of Nevada County**
Case Number: **TEMP-PW4WR4YX**
Lower Court Case Number:

1. At the time of service I was at least 18 years of age and not a party to this legal action.

2. My email address used to e-serve: **carson@civilrightscorps.org**

3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
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PETITION FOR REVIEW	KJOLLER Petition for Review
REQUEST FOR JUDICIAL NOTICE	KJOLLER Request for Judicial Notice and Proposed Order
PROOF OF SERVICE	KJOLLER Proof of Service

Service Recipients:

Person Served	Email Address	Type	Date / Time
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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.

10/30/2025

Date

/s/Ruby Yearling

Signature

White, Carson (323535)

Last Name, First Name (PNum)

Civil Rights Corps

Law Firm