1	MANH NGUYEN, Contestant, In Pro Per 891 Wyman Way, # 3 San Jose, California 95133 Tel: (408) 717-3660 Fax: (415) 732-7701 Email:manhnguyenforsanjosecouncil@gmail.com				
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8	CUREDIOD COURT OF TWE CT ATE OF CALLEODAY				
9	SUPERIOR COURT OF THE STATE OF CALIFORNIA  FOR THE COUNTY OF SANTA CLARA  UNLIMITED JURISDICTION				
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12	MANH NGUYEN,	Case No.			
13	Contestant,	CONTESTANT MANH NGUYEN'S			
14	v.	VERIFIED STATEMENT OF ELECTION CONTEST			
15	LAN DIEP,	(California Elections Code			
16	Respondent.	Sections 16100 and 16400)			
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20					
21	1. Contestant MANH NGUYEN (	("Contestant") is a qualified elector of the			
22	Fourth City Council District of the City of San Jose, California, in which a contested				
23	election for the office of San Jose City Council, Fourth District, was held on Tuesday,				
24	June 7, 2016.				
25	2. Defendant LAN DIEP ("Defendant") was declared elected to that office on				
26	July 7, 2016, by the Santa Clara County Registrar of Voters, who had canvassed the				
27	returns for that office.				
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Contestant Manh Nguyen's Verified Statement of Election Contest

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Contestant Manh Nguyen's Verified Statement of Election Contest 3

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7	5.	The nature of the irregularities, improper conduct, mistakes, errors,				
8	misconduct,	t, or other cause of contest at each of the precincts listed above is still being				
9	investigated	tigated and includes, but is not limited to the following:				
10		A.	The precinct boards or any members thereof were guilty of			
11			malconduct;			
12		В.	Illegal votes were cast;			
13		C.	Eligible voters who attempted to vote in accordance with the laws of			
14			the state were denied their right to vote;			
15		D.	The precinct boards, in conducting the election or in canvassing the			
16			returns, made errors sufficient to change the result of the election as			
17			to any person who has been declared elected; and			
18	,	E.	There was an error in the vote-counting programs or summation of			
19			ballot counts.			
20	6.	Conte	stant reserves the right to amend this Verified Statement of Contest as			
21	he learns more specific information about the nature of the irregularities, improper					
22	conduct, mistakes, errors, misconduct, or other cause of contest.					
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28		Conte	stant Manh Nguyen's Verified Statement of Election Contest			
- 11		COTTO	Committee the contract of the			

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WHEREFORE, Contestant MANH NGUYEN prays:

- 1. That the election of Defendant LAN DIEP be set aside;
- 2. That Contestant MANH NGUYEN be adjudged elected;
- 3. For Contestant's costs of suit herein; and
- 4. For such other and further relief as may be proper.

Executed at San Jose, California this 1st day of August, 2016.

Respectfully Submitted:

Ву:

MANH NGUYEN Contestant, In Pro Per

## **VERIFICATION**

## COUNTY OF SANTA CLARA, STATE OF CALIFORNIA

I, Manh Nguyen, am a party to this action. I have read the foregoing "CONTESTANT MANH NGUYEN'S VERIFIED STATEMENT OF ELECTION CONTEST" and know its contents.

The matters stated in the foregoing document are true and correct of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on August 1, 2016 at San Jose, California.

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

