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12 *Attorneys for Plaintiffs and Petitioners*  
13 BILL SANDLIN and ORANGE COUNTY  
14 VETERANS MEMORIAL PARK FOUNDATION

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF ORANGE

17 BILL SANDLIN, an individual; and  
18 ORANGE COUNTY VETERANS  
19 MEMORIAL PARK FOUNDATION, a  
20 California Nonprofit Organization,

21 *Petitioners,*

22 v.

23 MOLLY McLAUGHLIN, Irvine City Clerk,  
24 in Her Official Capacity; NEAL KELLEY,  
25 Orange County Registrar of Voters, in His  
26 Official Capacity; and DOES 1 through 20,  
27 inclusive,

28 *Respondents,*

EDWARD S. POPE, an individual; SAM V.  
CASTELO, an individual; CAROLYN  
INMON, an individual; BOBBY DUNHAM,  
an individual; TOM ROBB, an individual;  
and DOES 1 through 20, inclusive,

*Real Parties in Interest.*

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

**APR 06 2018**

DAVID H. YAMASAKI, Clerk of the Court

BY: \_\_\_\_\_, DEPUTY

Case No. 30-2018-00975288-CU-WM-CJC

**W.S. 4-6-18**

**[PROPOSED] JUDGMENT**

Dept: C19

Judge: Hon. Schwarm

Petition Filed: February 22, 2018

This matter came on for hearing before this Court at 1:30 p.m. on March 20, 2018, and continued at 8:30am on March 27, 2018 in Department C19 of the Orange County Superior Court, the Honorable Walter P. Schwarm, presiding. Petitioner Bill Sandlin was represented by Thomas Hiltachk of Bell, McAndrews & Hiltachk, LLP. Respondent Molly McLaughlin was

1 represented by Mark Austin, of Rutan & Tucker, LLP. Respondent Neal Kelley was represented  
2 by Rebecca Leeds Senior Deputy County Counsel. Real Parties in Interest Edward S. Pope; Sam  
3 V. Costelo; Carolyn Inmon; Bobby Dunham; and Tom Robb were represented by Beverly  
4 Grossman Palmer of Strumwasser & Woocher LLP.

5 The Court considered the pleadings on file, documentary evidence and the arguments of  
6 counsel and therefore issued its Minute Order on March 29, 2018, attached hereto as Exhibit A.  
7 The matter having been submitted for decision and good cause appearing therefore,

8 IT IS ORDERED, ADJUDGED AND DECREED that:

9 1. The Petition for Writ of Mandate is Granted, in part. The Clerk of Court is directed to  
10 issue its preemptory Writ of Mandate as follows:

11 a. Respondent Molly McLaughlin, Orange County City Clerk and Neal Kelley  
12 Orange County Registrar of Voters, are ordered to delete or amend from the  
13 Ballot Argument Against the Measure, as indicated on Exhibit B.

14 b. Respondent Molly McLaughlin, Orange County City Clerk and Neal Kelley  
15 Orange County Registrar of Voters, are further ordered to delete or amend the  
16 Rebuttal Argument regarding the Measure, as indicated on Exhibit C.

17 2. The Petition for Writ of Mandate is Denied as to the remaining issues raised.  
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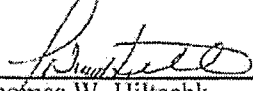
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20 Honorable Schwarm, Dept C19  
21 JUDGE OF THE SUPERIOR COURT

22 Dated: 4-6-18  
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DATED: April 2, 2018

Approved as to form,  
BELL, McANDREWS & HILTACHK, LLP

  
\_\_\_\_\_  
Thomas W. Hiltachk  
*Attorney for Plaintiffs*

DATED: April \_\_\_, 2018

Approved as to form,  
RUTAN & TUCKER, LLP

\_\_\_\_\_  
Mark J. Austin  
*Attorney for Defendant Molly McLaughlin*

DATED: April 3, 2018

Approved as to form,  
OFFICE OF THE ORANGE COUNTY  
COUNSEL

  
\_\_\_\_\_  
Rebecca S. Leeds  
*Attorney for Defendant Neal Kelley*

DATED: April \_\_\_, 2018

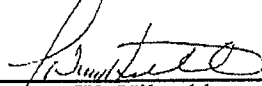
Approved as to form,  
STRUMWASSER & WOOCHEER, LLP

  
\_\_\_\_\_  
Beverly Grossman Palmer  
*Attorney for Real Parties in Interest*

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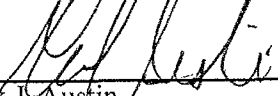
DATED: April 2, 2018

Approved as to form,  
**BELL, McANDREWS & HILTACHK, LLP**

  
\_\_\_\_\_  
Thomas W. Hiltachk  
*Attorney for Plaintiffs*

DATED: April 2, 2018

Approved as to form,  
**RUTAN & TUCKER, LLP**

  
\_\_\_\_\_  
Mark J. Austin  
*Attorney for Defendant Molly McLaughlin*

DATED: April \_\_\_\_, 2018

Approved as to form,  
**OFFICE OF THE ORANGE COUNTY  
COUNSEL**

\_\_\_\_\_  
Rebecca S. Leeds  
*Attorney for Defendant Neal Kelley*

DATED: April \_\_\_\_, 2018

Approved as to form,  
**STRUMWASSER & WOOCHEER, LLP**

\_\_\_\_\_  
Beverly Grossman Palmer  
*Attorney for Real Parties in Interest*

Exhibit A

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Exhibit A

SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

MINUTE ORDER

DATE: 03/29/2018

TIME: 10:13:00 AM

DEPT: C19

JUDICIAL OFFICER PRESIDING: Walter Schwarm

CLERK: Linda K Reid

REPORTER/ERM: None

BAILIFF/COURT ATTENDANT: None

CASE NO: **30-2018-00975288-CU-WM-CJC** CASE INIT.DATE: 02/22/2018

CASE TITLE: **Sandlin vs. McLaughlin**

CASE CATEGORY: Civil - Unlimited CASE TYPE: Writ of Mandate

EVENT ID/DOCUMENT ID: 72782621

**EVENT TYPE:** Under Submission Ruling

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**APPEARANCES**

There are no appearances by any party.

The Court, having taken the Petition for Writ of Mandate under submission on 03/27/2018 and having fully considered the arguments of all parties, both written and oral, as well as the evidence presented, now rules as follows:

**FINAL RULING: *Sandlin v. McLaughlin* (Case No. 30-2018- 00975288)**

On February 27, 2018, Petitioners filed a First Amended Verified Petition for Writ of Mandate (Elections Code §§ 9295; 13314). This Petition challenges nine ballot arguments that the Petitioners claim are false or misleading within the meaning of Elections Code section 9295, subdivision (c). (Petition, ¶¶ 13 and 14.) Respondents (Real Parties in Interest) contend that Petitioner has failed to show, by clear and convincing evidence " . . . that the ballot arguments are false or misleading . . . ." (Opposition to Verified Petition for Writ of Mandate by Real Parties in Interest (hereafter "Opposition"); 18:27-28.) The Ballot Label at issue reads as follows:

"Shall Ordinance No. 17-08, approving a zone text amendment so as to facilitate the development of the Southern California Veterans Cemetery by reflecting an exchange of City-owned property for the State-approved site at the intersection of Bake Parkway and Interstate 5, commonly known as Strawberry Fields, be adopted?" (Petitioners' RJN, Exhibit B.)

Initially, the court grants Petitioners' request for judicial notice pursuant to Evidence Code section 452, subdivision (h). This objection is based on California Rules of Court, rule 3.1113(d). The court sustains this objection only to the extent that the Reply could be construed as avoiding California Rules of Court, rule 3.1113(d). The court is not suggesting that it is finding that Petitioners were attempting to avoid

DATE: 03/29/2018

MINUTE ORDER

DEPT: C19

Page 1  
Calendar No.

compliance with California Rules of Court, rule 3.1113(d).

According to the Ballot Label, Ordinance No. 17-08 addresses the exchange of two pieces of property. The City Attorney's Impartial Analysis of Ordinance 17-08, which is not the subject of a legal challenge, explains the exchange, in relevant part, as follows:

"This measure involves two approximately 125-acre properties within the City's '8.1 Trails and Transit Oriented Development' zoning district. Both properties are on the former Marine Corps Air Station, El Toro and are located near, but outside, the boundaries of the Orange County Great Park." [¶] The first property is privately-owned and located near the intersection of Bake Parkway and Interstate 5. . . . [¶] The second property is City-owned and located adjacent to Irvine Boulevard, between Ridge Valley and Alton Parkway. (Petitioners' RJN, Exhibit C.)

The effect of this exchange is that the City of Irvine will become the owner of the property located at the intersection of Bake Parkway and Interstate 5, and the private owner will become the owner of the property located "adjacent to Irvine Boulevard, between Ridge Valley and Alton Parkway." (The court will refer to the property located at the intersection of Bake Parkway and Interstate 5 as the Bake Parkway site. Respondent also refers to the Bake Parkway site as Strawberry Fields. The court will refer to the property located adjacent to Irvine Boulevard, between Ridge Valley and Alton Parkway, as the ARDA Transfer Site because the parties use this designation. The ARDA Transfer Site designation is based on the Amended and Restated Development Agreement entered into between the City of Irvine and Heritage Fields El Toro LLC. (March 14, 2018 Larson Decl., ¶ 4 and Exhibit 21.)

According to the Petition, Respondents are the authors of the ballot argument and rebuttal argument against adoption of Ordinance No. 17-08. (Petition, ¶¶ 5, 10, 11, 13, and 14.)

Elections Code section 13314 states, "(a)(1) An elector may seek a writ of mandate alleging that an error or omission has occurred, or is about to occur, in the placing of a name on, or in the printing of, a ballot, county voter information guide, state voter information guide, or other official matter, or that any neglect of duty has occurred, or is about to occur. [¶] A peremptory writ of mandate shall issue only upon proof of both of the following: [¶] That the error, omission, or neglect is in violation of this code of the Constitution. [¶] That issuance of the writ will not substantially interfere with the conduct of the election." Elections Code section 9295, subdivision (b)(2), provides, "A peremptory writ of mandate or an injunction shall be issued only upon clear and convincing proof that the material in question is false, misleading, or inconsistent with the requirements of this chapter, and that issuance of the writ or injunction will not substantially interfere with the printing or distribution of official election materials as provided by law." Elections Code section 9295, subdivision (b)(2), applies to ballot arguments because it incorporates Elections Code section 9282 which authorizes ballot arguments. (Elec. Code, §§ 9282 and 9285, subd. (a).)

Referring to Elections Code section 9295, *Huntington Beach City Council v. Superior Court (Huntington Beach)* (2002) 94 Cal.App.4<sup>th</sup> 1417, 1422-1423, states, "Rather, the statute *only*-and that is the word used in the statute-allows a trial court to strike a statement if it is 'false, misleading, or inconsistent with the requirements of this chapter' (that is, chapter 3 of the Elections Code, dealing with initiative and referendum in municipal elections), and even then there must be *clear and convincing evidence* the statement is false, misleading, or inconsistent with the requirement so the chapter. [¶] Section 9282 authorizes voter pamphlet arguments, and merely states that a proposed argument must be 'for or against any city measure.' The implication is as long as a statement is 'for or against' a city measure, it is relevant enough, and it is not the province of the courts to blue-pencil statements merely on the basis

that they do not believe them to be persuasive or cogent." (Italics in original.)

*Mandacino v. Maggard* (1989) 210 Cal.App.3d 1413, 1417, explains, "The context in which a statement is made is critical to whether it is understood as a statement based on fact or an expression of the speaker's opinion. In *Gertz v. Robert Welch, Inc.* (1974) 418 U.S. 323, 339â€"340, 94 S.Ct. 2997, 3006â€"07, 41 L.Ed.2d 789, the high court made the oft-quoted pronouncement, 'Under the First Amendment there is no such thing as a false idea.' A statement in a ballot argument is generally understood by the voting public to be the opinion of the writer. In *Chavez v. Citizens for a Fair Farm Labor Law* (1978) 84 Cal.App.3d 77, 82, 148 Cal.Rptr. 278, a defamation action, the court reasoned that '[s]tatements made in [the context of initiative issues] generally are, and should be, treated as opinions. This is particularly true when they concern an initiative measure. Almost all, if not all, statements concerning the *effect* or *application* of an initiative can only be the opinion of the interpreter and the voting public is generally aware of this."

The court will address the challenged ballot arguments in the order presented by the Petitioners. RJN, Exhibit D, contains the challenged arguments.

**"There is no give-away."**

Petitioners contend that the ballot argument that states, "Your NO on Measure \_\_\_\_ will STOP three Irvine City Councilmembers from giving away-to giant developer Five Points Communities-the 125-acre site *in the Great Park . . .*" is misleading. (RJN, Exhibit D.) The term "giving away" implies that the developer is getting something for free. That is, the developer is not exchanging anything for the 125-acre site. The terms of the Ballot Label reflect an exchange of "City-owned" property (the ARDA Transfer Site) for property at the intersection of Bake Parkway and Interstate 5. Further, RJN, Exhibit F, is the Veterans Cemetery Land Swap Agreement, and indicates that Heritage Fields El Toro, LLC will transfer approximately 130.5 acres to the City of Irvine. Thus, based on this evidence, the court finds, by clear and convincing evidence, that the use of the term "giving away" is misleading. The City of Irvine is receiving property in exchange for the property it is transferring.

**"The city-owned ARDA-site is not 'in the Great Park.' "**

RJN, Exhibit C, is the "City Attorney's Impartial Analysis of Ordinance 17-09, which is not subject to a legal challenge. This analysis indicates that "Both properties are on the former Marine Corps Air Station El Toro and are located near, but outside, the boundaries of the Orange County Great Park." RJN, Exhibit H, indicates that the ARDA Transfer Site is outside the boundaries of the Orange County Great Park. Although other City documents refer to the ARDA Transfer Site as within the boundaries of the Orange County Great Park (for example, see RJN, Exhibit K), RJN Exhibits C and H, establish that the ARDA transfer site is not in the Orange County Great Park. Thus, the court finds, by clear and convincing evidence, the ballot arguments (RJN, Exhibit D) that refer to the ARDA Transfer Site as being in the Great Park are false or misleading.

**A Veterans cemetery at the city-owned ARDA site is not 'state-approved,' is not 'construction ready,' and cannot be built and maintained 'at no cost to the city.' "**

First, the court finds that Petitioners have not established, by clear and convincing evidence, that the



argument pertaining to the operation of the Veterans Cemetery at no cost to the City is false or misleading. Read in context, this argument expresses an opinion relating to a future expectation that there will be no cost to the city once the Veterans Cemetery is built.

Second, the court finds that Petitioners have not shown, by clear and convincing evidence, that the term "state approved," in the context of a ballot argument is false or misleading. RJN, Exhibit L, is a news article that quotes Governor Brown as stating, "Let the locals pick and we'll back them up. So there it is." The ballot argument has support from the Governor's Office that the state will approve any site supported by the local electorate. Thus, the use of the term "state approved" is not necessarily false or misleading.

Third, the court finds, by clear and convincing evidence, that the term "construction ready" is misleading. Petitioners have submitted evidence demonstrating that there is a current shortfall with respect to funding a Veterans cemetery at the ARDA site. (RJN, Exhibits J, K, and L.) Attachment 1 to Exhibit J (May 30, 2017 Memorandum from City Manager Sean Joyce to Mayor Donald P. Wagner and Counsel Member Melissa Fox), states, in part, "The state's offer of \$30 million, if matched by the city, would still leave the ARDA site and our deserving veterans almost \$20 million short in available funds to actually build and operate the cemetery." Exhibit K (September 7, 2017, Request for Planning Commission Action), at page 3, provides, in part, "Based on a June 2016 study by the State of California, Department of General Services, the demolition and site preparation costs for the existing ARDA Transfer Site alone (prior to any new construction of cemetery improvements) would be approximately \$30 million." Exhibit P (March 30, 2017 Memo from Councilmember Jeffrey Lalloway to Mayor & City Council) states, in relevant part, "I have given further consideration to the subject of my March 28, 2017 memorandum asking for a status report of the City's pursuit of a Veterans Cemetery at the previously designated 125-acre ARDA site, in which I suggested that the City should allocate funding to make it a more compelling proposition relative to other proposed sites in the United States. [¶] I realize that a specific proposal will allow all of us to move swiftly beyond abstract support to a clear proposal that can be the subject of informed deliberation. Thus, I propose that the City Council appropriate up to \$40 million of the estimated \$77 million cost of design, demolition and construction of the Veterans Cemetery."

At a City of Irvine Council meeting on January 9, 2018, Councilmember Lalloway stated, "We proposed-I proposed-\$38 million of the City to build the site in the Great Park. There was at that point, and I differ with you, Mr. Brower. There was \$30 million that Sharon Quirk-Silva had put in the State budget to have the cemetery move forward. And there was a commitment of \$10 million from the federal government. There's no disputing those facts. And it was ready to go, and I did ask the question of Barry, and we could have started demolition. It's our property! We could've started demolition within a few months. I think it was within 60 days." (March 12, 2018 Palmer Decl., ¶ 3.)

In considering the above, the court finds, by clear and convincing evidence, that the term "construction-ready" is misleading because the necessary funding to begin construction is not available for whatever reason. "Construction-ready" implies that construction can begin within a short period of time. Without funding, the construction cannot begin. Therefore, the court finds, by clear and convincing evidence, that the term "construction-ready" is misleading.

**"The ordinance does not authorize massive new office, commercial, manufacturing, and industrial development and 8,000 more car/truck trips in the Great Park."**

The court finds that Petitioners have not shown, by clear and convincing evidence, that this ballot argument is false or misleading. This ballot argument is merely the authors' expression of the effects

that Ordinance 17-08 will have in the area of Irvine Boulevard, Sand Canyon, and Jeffrey. Further, RJN Exhibit A, at Section 6.1, shows that one of the impacts of Ordinance No. 17-08 is to allow the shifting of 812,000 square feet of Research & Development to the ARDA Transfer Site.

**"The land swap involves the City and Heritage Fields El Toro, LLC; not Five Points or Five Points Communities."**

The court finds that Petitioners have established that Heritage Fields El Toro, LLC is the entity that is exchanging properties with the City of Irvine. (RJN, Exhibit F.) Thus, the court finds, by clear and convincing evidence, that the ballot arguments suggesting that Five Points Communities is the entity receiving the property is misleading.

**"The taxpayer savings and developer commitment to help fund the cemetery was real."**

The court finds that Petitioners have not established, by clear and convincing evidence, that the ballot argument challenging that placing the Veterans cemetery at the Bake Parkway site would save taxpayer money is false or misleading. This rebuttal argument advocates a position that there will be no tax benefit by placing the Veterans cemetery at the Bake Parkway site.

Therefore, the court grants Petition for Writ of Mandate, in part, and orders Respondents to edit their ballot arguments as follows: (1) Delete the term "giving away" as used in the "Argument Against Measure" (RJN, Exhibit D), and the term "giveaway" as used in the "Rebuttal Argument Against Adoption of Ordinance No. 17-08." (RJN Exhibit E); (2) Delete any reference to "at" or "in" the Great Park; (3) Delete any reference to "Five Points" or "Five Point" and replace with "Heritage Fields El Toro, LLC;" and (4) Delete the word "construction" from the term "construction-ready."

The court denies Petitioners' Writ of Mandate as to the remaining issues raised by the Petition.

The court stresses that its ruling is not intended as a comment on the merits of the zone change implemented by Ordinance No. 17-08, or the impact of that zone change on the Bake Parkway site or the ARDA Transfer Site.

At the hearing on March 27, 2017, after receiving the court's tentative ruling, the parties represented that they had agreed on the following modifications to the ballot arguments: (1) The parties agreed to substitute the word "developer" in place of any reference to "Five Point;" (2) After discussion with the court, the parties agreed to substitute the word "trade" for "giving away" and "giveaway;" (3) The parties agreed to substitute the word "alongside" in place of any reference to "at" or "in" the Great Park; and (4) The parties agreed to modify the introductory part of the first bullet point contained in RJN Exhibit D to read as follows, "Your NO vote on Measure will STOP three Irvine City Councilmembers from trading properties with a giant developer, including the 125-acre site . . . ."

At the hearing on March 27, 2018, the parties indicated that the court could give its ruling by way of minute order. The court orders Petitioners to prepare a Judgment that is consistent with the court's order granting Petitioners' Writ of Mandate in part, and that is consistent with the agreement between the parties. The court requires the Judgment to be prepared in a form that will adequately advise the Orange County Registrar of Voters as to how to prepare the ballot materials at issue with respect to this Writ of Mandate. Petitioners are to submit this Judgment no later than April 2, 2018.

Court orders Clerk to give notice.

Exhibit B

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**Exhibit B**

CITY OF IRVINE  
OFFICE OF THE CITY CLERK  
Direct Argument  
(Against Adoption of Ordinance No. 17-08)

RECEIVED  
CITY OF IRVINE  
CITY CLERK'S OFFICE  
FEB 13 2018

Argument Against Measure \_\_\_\_ named  
(Title to be Determined)

10:47 A.M./P.M.

For the first time in decades, on June 5th Irvine voters will decide on the future growth and development of our City.

- Your NO vote on Measure will STOP three Irvine City Councilmembers from ~~giving away~~ <sup>trading properties with a</sup> to giant developer ~~FivePoint Communities~~ <sup>including</sup> the 125-acre site ~~at the~~ <sup>alongside</sup> the Great Park that our City dedicated four years ago for creation of a peaceful, beautiful Veterans Cemetery.
- Your NO vote on Measure will also STOP accompanying zone changes that permit ~~FivePoint~~ <sup>the developer</sup> to build 812,000 square feet of massive office, commercial, manufacturing and industrial development ~~at the~~ <sup>alongside</sup> the Great Park, adding more than 8,000 car and truck trips every day on Irvine Boulevard, Sand Canyon, Jeffrey, and throughout Irvine.
- Your NO vote on Measure will make sure the Southern California Veterans Cemetery is built ~~at the~~ <sup>alongside</sup> the Great Park, as planned, designed and approved by the City of Irvine, CalVet, and the U.S. Department of Veterans Affairs. The project has been ~~construction-ready~~ for a year.

**Most important:** Your NO vote on Measure paves the way for Councilmembers Jeff Lalloway and Lynn Schott to re-introduce their resolution to immediately commence construction of the Veterans Cemetery ~~at the~~ <sup>alongside</sup> the Great Park, as originally planned and promised. Once built, the Veterans Cemetery will be operated and maintained in perpetuity by the State, at no cost to the City.

**Voter beware!** Measure \_\_\_\_, drafted for ~~FivePoint's~~ <sup>the developer's</sup> benefit by three pro-developer Councilmembers, will move the planned Veterans Cemetery three miles away — to ~~FivePoint's~~ <sup>the developer's</sup> deceitfully named "Strawberry Fields" site — at the I-405 and I-5 interchange, one of the busiest, most congested and polluted stretches of freeway in the nation.

Please join with your 19,164 Irvine neighbors who signed the Referendum Petition that gives you the opportunity to Vote NO on Measure. For information and official documents, go to: [www.VoteNOonIrvineMeasure.com](http://www.VoteNOonIrvineMeasure.com).

"The undersigned proponent(s) or author(s) of the Direct Argument against the ballot measure \_\_\_\_, named the ("Title to Be Determined"), at the Special Municipal Election for the City of Irvine, California to be held on June 5, 2018 hereby state that the argument is true and correct to the best of their knowledge and belief."

Exhibit C

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# Exhibit C

CITY OF IRVINE  
OFFICE OF THE CITY CLERK

RECEIVED  
CITY OF IRVINE  
CITY CLERK'S OFFICE

Rebuttal Argument Against Adoption of Ordinance No. 17-08

2018 FEB 23 PM 4:52

Rebuttal to Argument in Favor of Measure \_\_\_\_, named  
("Title To Be Determined")

Following Measure \_\_\_\_'s defeat on June 5th, Councilmembers Jeff Lalloway and Lynn Schott will re-introduce their resolution to immediately commence construction of the Veterans Cemetery <sup>alongside</sup> the Great Park. The plain truth is that the CalVet-designed and VA-approved Great Park Veterans Cemetery would be under construction today, with \$30 million of State funding, if three Councilmembers — Wagner, Shea, and Fox — hadn't sabotaged the project by adopting Ordinance 17-08.

Ordinance 17-08 is a zone-change <sup>trade</sup> that enables <sup>a</sup> developer ~~to build~~ to build massive office and industrial projects on the 125-acre Veterans Cemetery site <sup>alongside</sup> our Great Park, reaping enormous profits.

No wonder <sup>the developer</sup> has spent millions enlisting their favorite politicians, insiders, and political organizations to support their scheme. They bully, and wangle support by spreading money and fake news.

For example, <sup>the developer's</sup> political operatives claim a Veterans Cemetery <sup>the developer's</sup> at the Great Park <sup>alongside</sup> would have graves amid dilapidated buildings and trash, while graves at ~~the~~ preferred site (at the I-5/I-405 interchange) will be in "strawberry fields." Nonsense! The truth is that the Cemetery, at either site, will be built to the highest standards — and maintained forever by the State at absolutely no cost to the City.

Claims that putting the Veterans Cemetery at <sup>the developer's</sup> freeway interchange site would save taxpayers money are baseless. So is ~~the~~ phony talk about putting \$10 million into the project. This is all part of ~~the~~ strategy to bluff and bully their way <sup>the developer's</sup> into our Great Park, and push our veterans out, <sup>the developer's</sup> <sup>the developer's</sup> <sup>alongside</sup>

We can't let them do it. Vote NO on Measure \_\_\_\_!

"The undersigned proponent(s) or author(s) of the Rebuttal Argument against the ballot measure \_\_\_\_, named the ("Title To Be Determined"), at the Special Municipal Election for the City of Irvine, California to be held on June 5, 2018 hereby state that the argument is true and correct to the best of their knowledge and belief."

Sign Name (exactly as printed)

Print Name (exactly as signed)

Date

Edward S. Pope

EDWARD S. POPE

2-23-18

Sam V. Castelo

SAM V. CASTELO

2-23-18

Carolyn Inmon

Carolyn Inmon

2-23-18

Tom Robb

Tom Robb

2/23/18