

1 expenditure of taxpayer funds or taxpayer-financed resources in furtherance of, ensuring compliance
2 with, or otherwise effectuating the racial, ethnicity, sexual preference, and transgender quotas required
3 by AB 979 is illegal.

4 23. On information and belief, Defendant contends AB 979 does not violate the California
5 Constitution and that therefore he is not expending taxpayer funds and taxpayer-financed resources
6 illegally and does not intend to expend or will not expend taxpayer funds and taxpayer-financed
7 resources illegally in the future.

8 24. A judicial declaration pursuant to Code of Civil Procedure section 1060 is necessary and
9 appropriate so that the parties may ascertain their respective legal rights and duties with respect to
10 Defendant's illegal expenditure of taxpayer funds and taxpayer-financed resources on AB 979.

11 25. Plaintiffs are being and will be irreparably harmed by Defendant's illegal expenditure of
12 taxpayer funds and taxpayer-financed resources on AB 979 unless and until Defendant's illegal
13 expenditures are enjoined.

14 26. Plaintiffs have no adequate remedy at law.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiffs pray for the following relief against Defendant:

17 1. A judgment declaring any and all expenditures of taxpayer funds and taxpayer-financed
18 resources in furtherance of, ensuring compliance with, or otherwise effectuating the racial, ethnicity,
19 sexual preference, and transgender quotas required by AB 979 to be illegal;

20 2. An injunction permanently prohibiting Defendant from expending or causing the
21 expenditure of taxpayer funds and taxpayer-financed resources in furtherance of, ensuring compliance
22 with, or otherwise effectuating the racial, ethnicity, sexual preference, and transgender quotas required
23 by AB 979.

24 3. Costs of suit herein;

25 4. Reasonable attorney's fees under the Private Attorney General Statute, Code of Civil
26 Procedure section 1021.5, the Common Defense Fund, and the Substantial Benefit Doctrine; and
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