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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF NAPA**

14 YEORYIOS C. APALLAS,

15 Petitioner,

16 v.

17 JOHN TUTEUR, NAPA COUNTY
18 REGISTRAR OF VOTERS; and DOES 1
19 through 20, inclusive,

20 Respondents.

21 BELIA RAMOS; MANUEL RIOS;
22 DAVID R. WHITMER; JERI HANSEN-
23 GILL; PHILLIP BLAKE; and DOES 21
24 through 40, inclusive,

25 Real Parties in Interest.

Case No.

**DECLARATION OF ALAN
GALBRAITH, MAYOR OF THE CITY
OF ST. HELENA**

**CALENDAR PREFERENCE REQUIRED
BY STATUTE (ELEC. CODE §
13314(A)(3))**

Date: April 11, 2018

Time: 8:30 a.m.

Dept: I

Judge: Hon. Rodney Stone

Action Filed: March 26, 2018

Filed concurrently with: Memorandum of
Points and Authorities; Declaration of Robert
Perlmutter; Request for Judicial Notice

26 I, Alan Galbraith, declare as follows:

27 1. I am the Mayor of the City of St. Helena, which is a city in Napa County. I was
28 first elected Mayor of the St. Helena City Council in November 2014, and I have continuously
served as the Mayor of St. Helena since taking office after that election.

2. I am aware that the Napa County Watershed and Oak Woodland Protection
Initiative of 2018 (“Initiative”) will appear on the June 5, 2018, ballot as “Measure C.”

1 3. I support Measure C. I also publicly supported the similar initiative proposed for
2 the ballot in 2016.

3 4. I have never taken a position opposed to Measure C. I have not given anyone
4 permission to represent that I oppose Measure C.

5 5. I have reviewed the official ballot argument against Measure C. I am aware that it
6 contains the following sentence (emphasis added): "Please join Napa County Farm Bureau,
7 Napa Valley Vintners . . . Napa County Supervisors, and Mayors in Napa County, *who all*
8 *oppose Measure C.*"

9 6. After reviewing the ballot argument against Measure C, I submitted a letter to the
10 editor to the *Napa Valley Register*, explaining my opinion that the above statement is
11 misleading. A true and correct copy of my letter to the editor is attached hereto as Exhibit 1.
12 This letter was published on March 20, 2018. A true and correct copy of the online version of
13 this publication, downloaded on March 25, 2018, is attached hereto as Exhibit 2.

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

16 Executed this 26th day of March, 2018 at St. Helena, California.

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19 ALAN GALBRAITH,
20 Mayor of the City of St. Helena

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EXHIBIT

1

To the editor:

I favor Measure C. This can come as no surprise. I advocated for the comparable measure two years ago. This included participation in a short film promotion.

The Measure C official ballot statement in opposition is misleading. It makes it appear that all mayors oppose Measure C. This is not true for me. I was not consulted.

My deep concern, two years ago and today, is the degradation of water quality coming into our Bell Canyon Reservoir. My duty as mayor is to protect a resource vital to our community's sustainability. In a perfect world, our City years ago would have bought the entire watershed feeding Bell Canyon. Our world is not perfect. My perception two years ago, and again today, is that the enhanced buffer zones created by Measure C around creeks and small streams are essential to protect our Reservoir.

Measure C is a contentious issue. I urge all Napa County voters to study the matter carefully. My assessment is that Measure C is worthy of your enthusiastic support.

Alan Galbraith
Mayor, City of Saint Helena

EXHIBIT

2

http://napavalleyregister.com/star/news/opinion/mailbag/st-helena-mayor-alan-galbraith-favors-measure-c/article_484ae8d5-212e-580d-ab4e-09d2dcff0210.html

St. Helena mayor Alan Galbraith favors Measure C

Alan Galbraith Mar 20, 2018

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Alan Galbraith

Mayor, City of St. Helena

MORE INFORMATION

A different perspective on Measure C

- Growers/vintners group supports Measure C
- Let's be stewards of the land
- Help save our oak woodlands
- Initiative will unfairly take property rights
- Napa County supervisors place oak woodland initiative on June ballot