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6 Attorneys for Real Party in Interest Tammy Kim  
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF ORANGE, NORTH JUSTICE CENTER**

11 RON SCOLESANG, an individual,

12 Petitioner,

13 v.  
14

15 CARL PETERSEN, City of Irvine City Clerk;  
BOB PAGE, Orange County Registrar of  
Voters,

16 Respondents.  
17

18 TAMMY KIM and DOES I-X,

19 Real Parties in Interest.  
20

Case No. 30-2025-01456473-CU-WM-NJC

Assigned for All Purposes to:  
Hon. Craig Griffin  
Department N17

**DECLARATION OF TAMMY KIM**

Date: February 6, 2025  
Time: 2:00 p.m.  
Dept.: N17

Action Filed: January 27, 2025  
Trial Date: None Set

21 **DECLARATION OF TAMMY KIM**

22 I, Tammy Kim, declare as follows:

23 1. I am a party in the above-entitled action. I have personal knowledge of the facts set  
24 forth herein. If called as a witness, I could and would competently testify to the matters stated  
25 herein.

26 2. My adult son, Christian Shin, is 22 years-old. He resides at 136 Cartier Aisle, Irvine,  
27 CA 92620, in a condominium that I own.  
28

1           3.     On Saturday, January 25, 2025, I attended the annual Fire and Ice Gala at  
2 Congregation Shir Ha-Ma'a lot, in Irvine, with my son Christian. I picked Christian up at his home  
3 during the day and helped him get ready for the event. After the event ended, I dropped him off at  
4 his home at 136 Cartier Aisle, Irvine, CA 92620. Attached hereto as **Exhibit A** is a true and correct  
5 copy of a picture of me at the event.

6           4.     I then went to my residence at 44 Willowrun. At approximately 10:30 p.m., I learned  
7 from my roommate, Dylan Churchill, that he had been visited by a Private Investigator who claimed  
8 to be investigating "a fraud complaint on behalf of the City of Irvine." He informed the private  
9 investigator that I am his roommate. I then contacted the Irvine City Manager (Oliver Chi) and  
10 Chief of Police (Walid Mike Kent) to get information about the alleged investigation by the City.  
11 Both the City Manager and the Chief of Police confirmed that investigator. I contacted the Irvine  
12 City Manager and Chief of Police, who was also at the gala. Attached hereto as **Exhibit B** is a true  
13 and correct copy of the text message string between Mr. Chi, Mr. Kent, and me.

14           5.     Attached hereto as **Exhibit C** is a copy of my California Driver's License, showing  
15 my address as 44 Willowrun, Irvine, CA 92604.<sup>1</sup>

16           6.     Attached hereto as **Exhibit D** is a copy of my sublease for the premises at 44  
17 Willowrun, Irvine, CA 92604. Under the sublease, I have the exclusive use of one bedroom and  
18 one bathroom, and shared access to the kitchen and living room. In consideration thereof, I pay  
19 \$1,500 per month.

20           7.     Attached hereto as **Exhibit E** is a screenshot of my online bank confirmation  
21 showing payment of my security deposit.

22           8.     Attached hereto as **Exhibit F** is a screenshot of my online bank confirmation showing  
23 payment of a prorated share of the January 2025 rent.

24           9.     Attached hereto as **Exhibit G** is a screenshot of my online bank confirmation  
25 showing a payment of the February 2025 rent.

26  
27 \_\_\_\_\_  
28 <sup>1</sup> My date of birth and Driver's License Number are redacted for privacy. My attorney has an  
unredacted copy of the Driver's License.

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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 to the best of my knowledge.

Executed on February 5, 2025.



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Tammy Kim

**EXHIBIT A**

**EXHIBIT A**





EVENTography  
[www.eventographyoc.com](http://www.eventographyoc.com)



**EXHIBIT B**

**EXHIBIT B**

To: Walid Mike, Oliver



Sat, Jan 25 at 10:28 PM

A PI came to the door saying they were investigating a fraud complaint on behalf of city of Irvine. My roommate answered the door. I was at the Shir Har Ma'alot gala when they came at around 8:30.

Oliver Chi

Hey Tammy! I'm sorry to hear about that situation. As you know, we don't hire private investigators to review fraud complaints, and I can assure you that whoever came to your door wasn't anyone associated with or involved with the City.

OC

Walid Mike Kent

WK

Definitely not Irvine PD.

**EXHIBIT C**

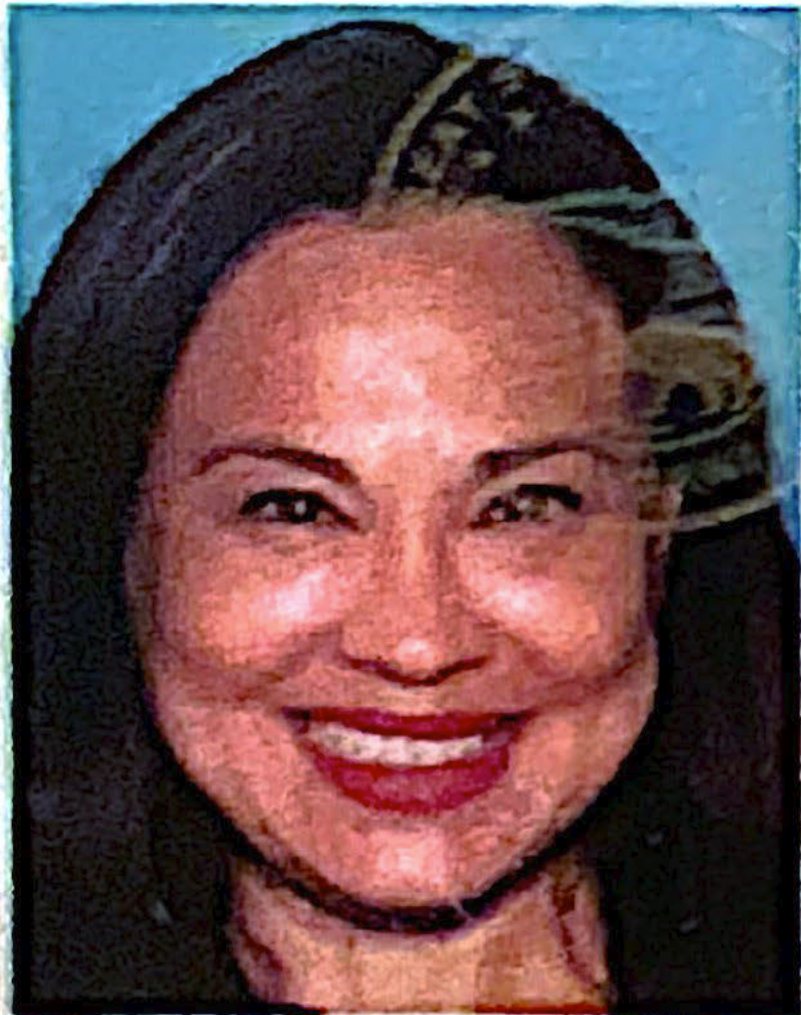
**EXHIBIT C**



# California

USA

## DRIVER LICENSE



DL



CLASS C

EXP



END NONE

LN KIM

FN TAMMY

44 WILLOWRUN  
IRVINE, CA 92604

DOB **01/16/1971**

RSTR NONE



01161971

SEX F

HAIR BRN

EYES BRN

HGT 5'-04"

WGT 145 lb

ISS

DD 05/06/202460526/BBFD/27

01/10/2025

**EXHIBIT D**

**EXHIBIT D**



Sublease Agreement ("Agreement") is made effective as of **January 10, 2025**, by and between **Dylan Churchill** ("Sublessor") and **Tammy Kim** ("Sublessee").

**Premises:** The premises subleased is located at 44 Willowrun, Irvine, CA 92604, specifically one bedroom and one bathroom designated for the exclusive use of the Sublessee. The Sublessee shall also have shared use of the kitchen and living room.

**Term of Sublease:** This Agreement is on a month-to-month basis, commencing on January 10, 2025. Either party may terminate this Agreement by giving the other a 30-day notice before moving out.

**Rent:** The Sublessee agrees to pay the Sublessor a monthly rent of \$1,500.00. Rent shall be payable on the first day of each month. All utilities associated with the premises are included in the monthly rent.

**Security Deposit:** The Sublessee shall pay a security deposit of \$400.00 to the Sublessor upon execution of this Agreement. This deposit will be refunded to the Sublessee upon termination of this Agreement, provided that the premises are left in good condition, normal wear and tear excepted.

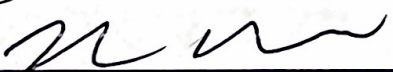
**Keys:** The Sublessee will be provided with one key to the apartment and one key to access the shared area pool/laundry. The replacement cost for any lost key is \$50 per key.

**Parking:** The Sublessee is entitled to park in any open uncovered spot available within the premises.

**Governing Law:** This Agreement shall be governed by and construed in accordance with the laws of the state of California.

**Signatures:** By signing below, both parties agree to abide by the terms and conditions of this Agreement.

Sublessor: Dylan Churchill 

Sublessee: Tammy Kim 

**EXHIBIT E**

**EXHIBIT E**



Hi, I'm Erica. How can I help?



Zelle payment to  
DYLAN  
CHURCHILL for  
"security  
deposit"; Conf#  
yceqb4wwt

[Edit Description](#)



Amount

-\$400.00

Transaction Date

01/10/2025

Type

Transfer

Merchant name 

**DYLAN CHURCHILL**

Transaction category

**Home & Utilities: Rent**



Investment, insurance and annuity products:

- **Are Not FDIC Insured**
- **Are Not Bank Guaranteed**
- **May Lose Value**
- **Are Not Deposits**
- **Are Not Insured by Any Federal Government Agency**
- **Are Not a Condition to Any Banking Service or Activity**

**EXHIBIT F**

**EXHIBIT F**

Hi, I'm Erica. How can I help?



Jan 2025 Rent 44  
Willowrun

[Edit Description](#)



Amount

-\$919.00

Transaction Date

01/13/2025

Type

Transfer

Merchant name 

**DYLAN CHURCHILL**

Transaction category

**Home & Utilities: Rent**



Investment, insurance and annuity products:

- **Are Not FDIC Insured**
- **Are Not Bank Guaranteed**
- **May Lose Value**
- **Are Not Deposits**
- **Are Not Insured by Any Federal Government Agency**
- **Are Not a Condition to Any Banking Service or Activity**

**EXHIBIT G**

**EXHIBIT G**



Zelle payment to  
DYLAN  
CHURCHILL for  
"Feb25 Rent 44  
Willowrun"; Conf#  
wkprqr2ke

[Edit Description](#)



Amount

-\$1,500.00

Transaction Date

02/03/2025

Type

Transfer

Merchant name ⓘ

**DYLAN CHURCHILL**

1 **PROOF OF SERVICE**

2 I am employed in the County of Orange, State of California. I am over the age of 18 and  
3 not a party to the within action. My business address is 711 E. Imperial Highway, Suite 201, Brea,  
CA 92821.

4 On February 5, 2025, I served the foregoing document(s):  
5 **REAL PARTY IN INTEREST TAMMY KIM'S EVIDENTIARY OBJECTIONS IN**  
6 **SUPPORT OF OPPOSITION TO PETITION FOR WRIT OF MANDATE; REAL PARTY**  
7 **IN INTEREST TAMMY KIM'S BRIEF IN OPPOSITION TO PETITION FOR WRIT OF**  
8 **MANDATE; DECLARATION OF TAMMY KIM**  
described as on all interested parties in this action. as stated below:

8 SEE ATTACHED SERVICE LIST

9  **BY MAIL** - I deposited such envelope in the mail at Brea, California. The envelope was  
10 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice  
11 of collection and processing correspondence for mailing. Under that practice it would be  
12 deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid  
13 at Brea, California in the ordinary course of business. I am aware that on motion of the  
party served, service is presumed invalid if postal cancellation date or postage meter date is  
more than one (1) day after date of deposit for mailing in affidavit.

14  **BY PERSONAL SERVICE** - I caused the aforementioned documents to be delivered  
15 personally to the party(s) identified on the attached service list at locations and times  
indicated on the service list.

16  **BY ELECTRONIC TRANSMISSION** - I caused a PDF version of the above  
17 document(s) to be transmitted by electronic mail to the email address(es) and party(ies)  
18 identified above from [admin@murdocklaw.com](mailto:admin@murdocklaw.com) .

19  **BY OVERNIGHT DELIVERY** - I deposited such envelope for collection and delivery  
20 by Federal Express, with delivery fees paid or provided for in accordance with ordinary  
21 business practices. I am "readily familiar" with the firm's practice of collection and  
22 processing packages for overnight delivery by Federal Express service. They are deposited  
with a facility regularly maintained by Federal Express for receipt on the same day in the  
ordinary course of business.

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

24 Executed on February 5, 2025, at Brea, California.

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27 \_\_\_\_\_  
Brandy N. Patel

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Irvine City Clerk