

FILED

MAY 17 2024 *PT*

SHASTA COUNTY SUPERIOR COURT
BY: P. THOMASY, DEPUTY CLERK

1 SHON NORTHAM, SBN 202912
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Attorney for Patrick Jones, Real Party in Interest
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8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SHASTA
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11 ANDERSON / MILLVILLE RESIDENTS,
12 an unincorporated association,
13 Petitioner,
14 vs.
15 COUNTY OF SHASTA; SHASTA COUNTY
16 BOARD OF SUPERVISORS and DOES 1-20,
17 Respondents
18 PATRICK JONES, and DOES 21-100
19 Real Parties in Interest
20

Case No. 23CV-0203713

**DECLARATION OF COUNSEL
IN SUPPORT OF
DISQUALIFICATION OF JUDGE
JUDGE HANNA PURSUANT TO
CCP 170.1(a)(6)(A)(i) and
170.3(c)(1).**

Date: 05-20-24
Time: 9:00 a.m.
Dept: 63

Judge: The Hon. JUDGE HANNA

Date Action Filed: 11-21-2023

21
22 **DECLARATION OF SHON NORTHAM**

23 I, Shon Northam, declare as follows:

- 24 1. I am an attorney licensed to practice law in the courts of the State of California;
25 2. Between August 1999 and January of 2000 I was a Post-Bar Graduate Law Clerk
26 in the San Diego County District Attorney's Office Gang Unit assisting in the
27 prosecution of violent street gang crimes including a number of *homicide* cases;
28 3. Between January 10, 2000, and September of 2000, I was employed as a Deputy

1 District Attorney for the Tehama County District Attorney's Office;

2 4. Between September 5, 2000, and July 5, 2006 I was employed as a Deputy

3 District Attorney for the Sacramento County District Attorney's Office;

4 5. While with the Sacramento County District Attorney's Office, I prosecuted
5 numerous serious and / or violent felony cases;

6 6. On July 6, 2006, I started my own practice in criminal defense;

7 7. That I have practiced as a criminal defense attorney in Shasta County since
8 accepting the homicide-arson case of People v. Zane Peterson (The Clover Fire)
9 in 2013;

10 8. That on May 16, 2024 Patrick Jones, Real Party in Interest, retained this Counsel
11 for representation in the above-entitled matter;

12 9. That on May 1, 2024 Counsel received an investigative report dated August 3,
13 2023 from the County of Shasta's Counsel relating to DA Stephanie's Bridgett
14 campaign violations during Bridgett's reelection campaign in 2022;

15 10. That I have reviewed said report;

16 11. That after reviewing said report I am of information and belief of the following:

17 a. That a person, hereinafter called "whistleblower" was an employee of
18 Shasta County District Attorney's Office during 2022 which was a
19 reelection year for Stephanie Bridgett;

20 b. That Stephanie Bridgett instructed her employees including secretarial
21 staff, Senior / Supervising Deputy District Attorneys and Deputy District
22 Attorneys to work on her reelection campaign during business hours and
23 "county time";

24 c. That during this time the Chief Deputy District Attorney, DA Bridgett's
25 second-in-command, was JUDGE HANNA;

26 d. That JUDGE HANNA was aware of the campaign violations;

27 e. That JUDGE HANNA neither reported nor disclosed to the California
28 State Bar the campaign violations being committed by DA Bridgett;

- 1
- 2 f. That during this time a Senior Deputy District Attorney, now also a high-
- 3 ranking member of the Bridgett Administration, is Kelly Kafel;
- 4 g. That Kelly Kafel is the current spouse of JUDGE HANNA;
- 5 h. That Kelly Kafel was the spouse of Judge Hanna during the reelection
- 6 campaign when Judge Hanna was the Chief Deputy District Attorney for
- 7 Shasta County;
- 8 i. That during DA Bridgett's reelection campaign, Kelly Kafel made a
- 9 number of public / social media remarks including remarks to the Shasta
- 10 County Board of Supervisors regarding this Counsel that were both
- 11 disparaging, inflammatory, not true, and attempted to portray Counsel as a
- 12 liar and politically motivated;
- 13 j. That Kelly Kafel made a number of remarks privately about Counsel and
- 14 commercials targeting DA Bridgett and her second-in-command, JUDGE
- 15 HANNA;

16 12. That as a result of the Whistleblower allegations an investigation was conducted

17 by the County Counsel of Shasta County relating to election fraud and the theft

18 and misuse of county resources and taxpayer dollars by Shasta County District

19 Attorney Stephanie Bridgett during her reelection campaign in 2022;

20 13. That DA Bridgett made a number of admissions regarding the unlawful

21 campaign activities / violations;

22 14. That a significant number of DA Bridgett's office expended county resources and

23 time on the reelection campaign despite being "on the clock" for the county;

24 15. That as a result of the fraudulent use and theft of Shasta County taxpayer dollars,

25 criminal defendants were not properly prosecuted and cases were either not

26 timely filed or filed at all;

27 16. That as a result of the fraudulent use and theft of Shasta County taxpayer dollars,

28 criminal defendants were not timely prosecuted and cases were either not timely

1 filed or filed at all resulting in a backlog of cases and prejudice to criminal
2 defendants;

3 17. That Counsel currently represents the defendant in *People v. Merrifield*
4 (24F1666);

5 18. That the misconduct committed by DA Bridgett and her office directly,
6 significantly, and materially prejudiced not only the defendant, Mr.
7 MERRIFIELD, but also a substantial number of other individuals facing criminal
8 charges;

9 19. That Mr. MERRIFIELD's criminal cases along with a significant number of other
10 defendants were directly impacted by DA BRIDGETT's misappropriation of
11 county resources; and

12 20. That this Court is a direct and percipient witness to DA Bridgett's fraudulent use
13 and theft of Shasta County taxpayer dollars;

14 21. That Kelly Kafel is also a direct and percipient witness to DA Bridgett's
15 fraudulent use and theft of Shasta County taxpayer dollars;

16 22. That Counsel is currently drafting and finalizing a Motion to Dismiss based on
17 DA Bridgett's conduct as well as several other grounds related to DA Bridgett's
18 Office policies and conduct and will be filed during the week of June 3, 2024 and
19 set for Hearing on June 17, 2024

20 23. That this Court will be receiving a subpoena during the week of June 3, 2024 to
21 appear as a witness on Mr. MERRIFIELD's Motion to Dismiss;

22 24. That despite the fact the report, as currently possessed, has redacted names, the
23 context of the report is clear Judge Hanna is referenced numerous times
24 throughout the report;

25 25. That as a result of DA Bridgett's malfeasance and this Court's connection to that
26 malfeasance, this Court is not in a position to be a fair and impartial arbiter of
27 this dispute; and,

28 26. That Counsel is asking this Court to recuse itself from this matter considering

1 Judge Hanna's current marital relationship with Kelly Kafel, as well as being a
2 percipient witness to the campaign violations, and will be called as a witness by
3 this Counsel in the *Merrifield* Motion to Dismiss.
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5 I hereby declare under the penalty of perjury that the foregoing is true and correct.
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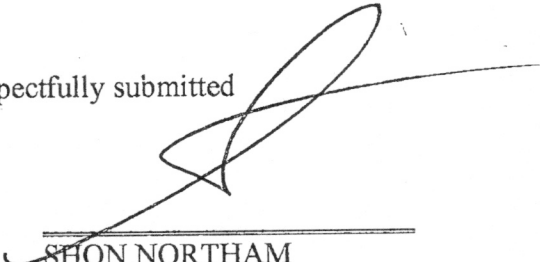
7 Executed this 17th day of May in the Year of Our Lord 2024 in Redding, California.
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9 DATED:

5/17/24

Respectfully submitted

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11 By:



12 SHON NORTHAM
13 Attorney for Patrick Jones
14 Respondent / Real Party in Interest
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