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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

RICHARD DWYER, an individual

Petitioner,

vs.

HANG NGUYEN, in her capacity as Registrar of Voters for the County of Sacramento; and DOES 1-10

Respondents,

FLOJAUNE COFER

Real Party in Interest.

Case No. 26WM000082

DECLARATION OF DR. FLOJAUNE COFER IN OPPOSITION TO VERIFIED PETITION FOR WRIT OF MANDATE

DATE: **March 27, 2026**
TIME: **1:30 p.m.**
DEPT.: **4**
JUDGE: **Jennifer K. Rockwell**

DECLARATION OF DR. FLOJAUNE COFER

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Declaration of Dr. Flojaune Cofer in Opposition to
Petition for Writ of Mandate Regarding Ballot Designation

I, Flojaune G. Cofer, declare as follows:

1. I am a resident of Sacramento County, California, over the age of eighteen, and competent to testify to the matters set forth herein. I have personal knowledge of the facts stated in this declaration.

2. I hold a Doctor of Philosophy (PhD) in Epidemiology from the University of Michigan School of Public Health. Epidemiology is a core discipline within the field of public health. **By training and profession, I am a doctor of public health.**

3. My current profession, vocation, and primary occupation are in public health. My work focuses on population health, health equity, and the development and implementation of evidence-based public health policy and practice.

4. As an epidemiologist and public health professional, my work includes analyzing health outcomes, addressing structural determinants of health, advising on public policy, and providing public health education and training to academic, governmental, and community audiences.

5. Within the calendar year of 2025 and 3 months immediately preceding this declaration, I have been actively engaged in paid and professional work in the field of public health, including compensated speaking, teaching, training, and policy-related activities.

6. On **October 22, 2025**, I served as a featured speaker at the California Black Birth Equity Summit Advocacy Roundtable and received payment for my professional public health expertise.

7. I have provided invited guest lectures in graduate-level public health courses, including at the University of California, Davis, where I provided the annual opening public health lecture for SPH 290 on **August 20, 2025**. I also presented on structural and community violence as a public health issue on **February 27, 2025** and **January 29, 2026** and received payment for my professional public health expertise.

8. I have provided invited guest lectures in undergraduate and graduate level courses at California State University, Sacramento, on **November 13, 2025** for the Community Organizing Social Work course and on **October 16, 2025** for an upper division course for health science majors for on "Gay in America: the AIDS/HIV Crisis and queer life in the 80s – which I guest lectured with my colleague, Reggie Caldwell.

9. My expertise has been recognized by state public health leadership, including an invitation from the California Department of Public Health to serve as a plenary speaker on **October 29, 2025** on firearm violence prevention and upstream public health strategies and received payment for my professional public health expertise.

10. I have also been invited to deliver keynote remarks for public health institutions, including the Alameda County Public Health Department's Public Health Week on **April 6, 2026**, reflecting recognition of my professional standing in the field and will receive payment for my professional public health expertise.

11. In addition, I facilitate professional trainings and provide strategic guidance to public health organizations, including leading a staff training on sustainability and public health strategy on **March 6, 2026**; I received payment for my professional public health expertise.

12. I have been engaged in state-level policy and advisory work addressing disparities in health and social systems, including consultation with the California Department of Social Services on reducing racial inequities in the child welfare system since the invitation was extended on **June 11, 2025**.

13. I have participated as a doctoral level expert witness in legal proceedings, most recently on **August 1, 2025** at the settlement conference for Sacramento Homeless Union v. City of Sacramento before United States Magistrate Judge Sean C. Riordan, Eastern District of California.

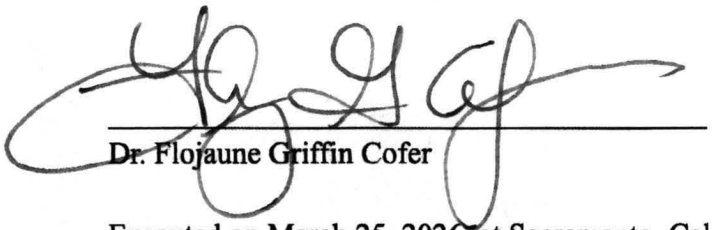
14. I have engaged in panel discussions and guest lectures for community events including on **June 2, 2025** Public Health Institute's podcast on substance use and Black women, **July 17, 2025** for Girls Rock Sacramento, the AFRAM 2015 Women's Roundtable on **September 20, 2025** and the Climate Justice Festival on **September 21, 2025**.

15. These activities demonstrate that my primary, ongoing, and most substantial professional work is in public health, and that I am regularly compensated for and recognized based on my expertise in that field.

16. The term "**Doctor**" accurately reflects my earned doctoral degree (PhD), and the term "**Public Health**" accurately reflects my current profession, vocation, and primary occupation.

17. Accordingly, my proposed ballot designation, **"Doctor, Public Health,"** is a true, accurate, and not misleading description of my current professional identity, consistent with California Elections Code §13107.

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



Dr. Flojaune Griffin Cofer

Executed on March 25, 2026, at Sacramento, California.