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March 29, 2016

**VIA U.S. MAIL**

Ms. Shirley Rudolph  
President, Board of Education  
Lawndale Elementary School District  
4161 W 147th Street  
Lawndale, CA 90260

Dr. Ellen Dougherty  
Superintendent  
Lawndale Elementary School District  
4161 W 147th Street  
Lawndale, CA 90260

Re: Demand for Compliance with California Voting Rights Act

Dear Ms. Rudolph and Dr. Dougherty:

We have received complaints from Latino voters in the Lawndale Elementary School District that the use of an at-large electoral system for the election of trustees results in the underrepresentation of Latinos on the Board, by preventing Latino voters from electing candidates of their choice. We reviewed demographic and electoral information pertaining to your jurisdiction with particular attention to the prohibitions of the California Voting Right Act of 2001 (“CVRA”). Based on our investigation, we believe that Lawndale Elementary School District is in violation of the CVRA and must convert to a by-district election system.

The CVRA, California Elections Code § 14027, states in relevant part:

An at-large method of election may not be imposed or applied in a manner that impairs the ability of a protected class to elect candidates of its choice or its ability to influence the outcome of an election, as a result of the dilution or the abridgment of the rights of voters who are members of a protected class...

Latino residents of Lawndale Elementary School District are a “protected class” within the meaning of the CVRA. U.S. Census population data reflects that Latinos constitute 57% of the total population and 43% of the Citizen Voting Age population of your district. However, only one of the

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current members of the Board is Latino, and there has been no other Latino Board member elected in at least the last eight election cycles. Based on our review of election returns and demographic information, we believe that the underrepresentation of Latinos on the Board results from the inability of Latino voters to elect candidates of choice due to racially polarized voting among the electorate in your at-large elections, and that continued use of at-large elections violates the CVRA. We therefore demand that the Board convert its at-large election system to a district-based electoral system under Education Code § 5019.

We request your response to this demand by April 18, 2016. In the absence of a satisfactory response, our clients will be forced to seek judicial relief in the form of an action to obtain an order converting the election system from at-large to by-district, together with other relief provided for in the CVRA, including an award of litigation and expert witness costs, and attorneys' fees.

We are available to discuss this matter with you.

Sincerely,



Denise Hulett  
National Senior Counsel  
MALDEF

DH/mg

cc: Cathy Burris, Clerk (via U.S. mail)  
Shirley Bennett, Trustee (via U.S. mail)  
Bonnie Coronado, Trustee (via U.S. mail)  
Ann Phillips, Trustee (via U.S. mail)