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August 9, 2019

Dr. Angelica M. Ramsey, Superintendent
Pleasant Valley School District
600 Temple Ave.
Camarillo, CA 93010

By certified mail

Re: Notice of Violation of California Voting Rights Act

Dear Dr. Ramsey:

First, we would like to acknowledge and thank you for your work--and the work of the Board of Education, faculty, and staff--serving the students, families, and communities of the Pleasant Valley School District.

On behalf of Francine Castano and Martha Martinez, members of a protected class and registered voters in the Pleasant Valley School District, this letter and the enclosed report assert that the Pleasant Valley School District's method of conducting elections may violate the California Voting Rights Act (the "CVRA"). I write as their sole legal representative rather than as a representative of the law firm with which I am Of Counsel.

Pursuant to California law, the Pleasant Valley School District Board of Education now has 45 days from receipt of this letter to adopt a resolution outlining its intention to transition from at-large elections to district elections, detailing specific steps it will take to facilitate this transition, and estimating the time-frame for this transition. If the Board of Education does not adopt a resolution to this effect within 45 days from the receipt of this letter, then a legal action will be commenced in California Superior Court (Ventura County) to require the Pleasant Valley School District to institute district elections pursuant to the CVRA. In order to allow the Board of Education to consider this matter at its regularly scheduled meetings, we would defer filing any court action until after September 23.

District elections are sweeping California. No government jurisdiction in California has successfully defended a complaint alleging a violation of the CVRA. Accordingly, we hope to negotiate a collaborative settlement with the Pleasant Valley School District that would cap costs and enable more participation by the Board of Education in the transition to district elections than would be the case through litigation.

As described in the enclosed report, advantages of a settlement agreement would include that implementation of district elections in the Pleasant Valley School District could be deferred until November 2022. This approach has proved successful in a number of other government jurisdictions.

A difficulty of requiring district elections in November 2020 that other jurisdictions have pointed out is that this would require the time and expense of two districting processes in two years--one for November 2020

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using 2010 census data, and a new process for November 2022 after the decennial 2020 census. Other jurisdictions have asked for a process whereby these costs in time and money could be incurred only once by commencement of district elections in November 2022 through an amicable settlement.

In either case--whether the Pleasant Valley School District would seek through a settlement agreement implementation of district elections in November 2020 or in November 2022--reimbursement costs are capped at \$30,000 if this matter is resolved prior to expiration of the statutory 45-day period. Financial savings from not having to implement district elections in 2020 typically exceed the statutory reimbursement cap. An additional benefit of a pre-litigation settlement agreement is that current Board of Education members who were elected in 2016 could run for re-election in 2020 under existing electoral arrangements through a settlement agreement to institute district elections starting in 2022.

As you are aware, most government jurisdictions in Ventura County--including most school districts--have decided to institute district elections. We are confident the Pleasant Valley School District will be an even better, and more representative, school district with district elections, and in compliance with state law.

We look forward to hearing from you and resolving the issues presented. Please advise us by September 10, 2019, whether you would like to discuss a voluntary change to your current at-large electoral system so we will know whether to prepare for litigation after September 23.

Thank you for your attention to this matter.

Very truly yours,

Hon. Frank J. Ochoa (Ret.)
Attorney/Arbitrator/Mediator

cc: Board of Education, Pleasant Valley School District