

**SUMMONS
(CITACION JUDICIAL)**

SUM-100

**NOTICE TO DEFENDANT: CITY OF RANCHO CUCAMONGA
(AVISO AL DEMANDADO): CALIFORNIA; and DOES 1-T00, inclusive**

RECEIVED

MAR 14 2016

**CITY CLERK
CITY OF RANCHO CUCAMONGA**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT**

MAR 10 2016

BY Jessica Morales
JESSICA MORALES, DEPUTY

**YOU ARE BEING SUED BY PLAINTIFF: SOUTHWEST VOTER
(LO ESTÁ DEMANDANDO EL DEMANDANTE): REGISTRATION
EDUCATION PROJECT**

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información en continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pide al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desestimar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

San Bernardino Superior Court
8303 Haven Avenue
Rancho Cucamonga, CA 91730

CASE NUMBER:
(Número de caso)
CIVDS 1603632

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

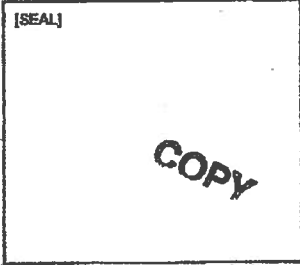
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Jonathan Douglass, Esq. Kevin L. Shenkman, Esq. Milton Grimes, Esq. R. Rex Parris (661) 949-2595 R. Rex Parris: (661) 949-7524
R. REX PARRIS LAW FIRM SHENKMAN & HUGHES LAW OFFICES OF MILTON GRIMES Kevin Shenkman, Esq. T: (310) 457-0970
43364 10th Street West 28905 Wight Road 3774 W. 54th Street Milton Grimes, Esq. T: (323) 295-3023 F: (323) 295-3708
Lancaster, CA 93534 Malibu, CA 90265 Los Angeles, CA 90043 Jessica Morales

DATE: MAR 10 2016 Clerk, by _____ Deputy
(Fecha) (Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served



- 1. as an individual defendant.
- 2. as the person sued under the fictitious name of (specify):

3. on behalf of (specify): CITY OF RANCHO CUCAMONGA

- under:
- CCP 416.10 (corporation)
 - CCP 416.20 (defunct corporation)
 - CCP 416.40 (association or partnership)
 - other (specify): PUBLIC ENTITY 416-50
 - CCP 416.60 (minor)
 - CCP 416.70 (conservatee)
 - CCP 416.90 (authorized person)

4. by personal delivery on (date): 3-14-16

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Kevin I. Shenkman, Esq. (SBN 223315)
Mary R. Hughes, Esq. (SBN 222622)
John L. Jones, Esq. (SBN 225411)
SHENKMAN & HUGHES PC
28905 Wight Road
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Telephone: (310) 457-0970

R. Rex Parris (SBN 96567)
Jonathan Douglass (SBN 289300)
R. REX PARRIS LAW FIRM
43364 10th Street West
Lancaster, California 93534
Telephone: (661) 949-2595
Facsimile: (661) 949-7524

Milton Grimes (SBN 59437)
LAW OFFICES OF MILTON C. GRIMES
3774 W 54th St
Los Angeles, California 90043
Telephone: (323) 295-3023
Attorneys for Plaintiff

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

MAR 10 2016

BY 
JESSICA MORALES, DEPUTY

RECEIVED
MAR 14 2016
CITY CLERK
CITY OF RANCHO CUCAMONGA

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO**

**SOUTHWEST VOTER
REGISTRATION EDUCATION
PROJECT**

Plaintiff,

v.

**CITY OF RANCHO CUCAMONGA,
CALIFORNIA; and DOES 1-100,
inclusive,**

Defendants.

Case No.: CIVDS1603632

**COMPLAINT FOR VIOLATION OF THE
CALIFORNIA VOTING RIGHTS ACT OF
2001**

1 COMES NOW Plaintiff Southwest Voter Registration Education Project (hereinafter
2 "SVREP" or "Plaintiff"), and alleges as follows:

3 **NATURE OF THE ACTION**

4 1. This action is brought by Plaintiff for injunctive relief against the City of
5 Rancho Cucamonga, California, for its violation of the California Voting Rights Act of 2001
6 (hereinafter the "CVRA"), Cal. Elec. Code §§ 14025, et seq. The imposition of the City of
7 Rancho Cucamonga's at-large method of election has resulted in vote dilution for the Latino
8 residents and has denied them effective political participation in elections to the Rancho
9 Cucamonga City Council. The City of Rancho Cucamonga's at-large method of election for
10 electing members to its City Council prevents Latino residents from electing candidates of
11 their choice or influencing the outcome of Rancho Cucamonga's City Council elections.

12 2. The effects of the City of Rancho Cucamonga's at-large method of election are
13 apparent and compelling. Despite a Latino population of approximately 35% in the City of
14 Rancho Cucamonga, according to the 2010 Census no Latino serves on Rancho Cucamonga's
15 City Council. Rather, in Rancho Cucamonga's most recent four elections – in 2008, 2010,
16 2012, and 2014, Latino candidates preferred by the Latino electorate were all defeated by the
17 bloc voting of the non-Latino electorate. The current absence of any Latinos on the Rancho
18 Cucamonga City Council reveals a lack of access to the political process. In fact, no Latinos
19 occupy any other elected office in the city government of Rancho Cucamonga – e.g. city
20 clerk or city treasurer – either.

21 3. Rancho Cucamonga's at-large method of election violates the CVRA. Plaintiff
22 brings this action to enjoin the City of Rancho Cucamonga's continued abridgment of Latino
23 voting rights. Plaintiff seeks a declaration from this Court that the at-large method of election
24 currently used by the City of Rancho Cucamonga violates the CVRA. Plaintiff seeks
25 injunctive relief enjoining the City of Rancho Cucamonga from further imposing or applying
26 its current at-large method of election. Further, Plaintiff seeks injunctive relief requiring the
27 City of Rancho Cucamonga to implement district based elections or other alternative relief
28 tailored to remedy Rancho Cucamonga's violation of the CVRA.

1 register Latino eligible voters, as well as SVREP's get-out-the-vote and advocacy projects in
2 Rancho Cucamonga.

3 8. By de-incentivizing the registration of Latinos eligible to vote, Rancho
4 Cucamonga's at-large election system obstructs SVREP's efforts to register Latino voters and
5 cause Latino registered voters to actually vote.

6 9. The Latino citizens of Rancho Cucamonga whose voting rights are immediately
7 harmed by the City of Rancho Cucamonga's adherence to an unlawful at-large system of
8 electing its city council are hindered from protecting their own interests. Many of the Latino
9 citizens of Rancho Cucamonga do not recognize that their voting rights are being violated by
10 the City of Rancho Cucamonga's adherence to an unlawful at-large system of electing its city
11 council, and still others fear reprisal by the City of Rancho Cucamonga if they were to seek
12 redress for the City of Rancho Cucamonga imposing its unlawful election system.

13 10. At all times herein mentioned, Defendant City of Rancho Cucamonga,
14 California (hereinafter "Rancho Cucamonga") is and has been a political subdivision subject
15 to the provisions of the CVRA.

16 11. Plaintiff is unaware of the true names and capacities, whether individual,
17 corporate, associate, or otherwise, of defendants sued herein as Does 1 through 100,
18 inclusive, and therefore, sues said defendants by such fictitious names and will ask leave of
19 court to amend this complaint to show their true names and capacities when the same have
20 been ascertained. Plaintiff is informed and believes and thereon alleges that defendants Does
21 1 through 100, inclusive, are responsible on the facts and theories herein alleged.

22 12. Does 1 through 100, inclusive, are Defendants that have caused Rancho
23 Cucamonga to violate the CVRA, failed to prevent Rancho Cucamonga's violation of the
24 CVRA, or are otherwise responsible for the acts and omissions alleged herein.

25 13. Plaintiff is informed and believes and thereon alleges that Defendants and each
26 of them are in some manner legally responsible for the acts and omissions alleged herein, and
27 actually and proximately caused and contributed to the various injuries and damages referred
28 to herein.

1 within the City of Rancho Cucamonga because there is a difference between the choice of
2 candidates or other electoral choices that are preferred by Latino voters, and the choice of
3 candidates or other electoral choices that are preferred by voters in the rest of the electorate,
4 with the result being that Latino-preferred candidates usually lose.

5 22. Racially polarized voting is legally significant in Rancho Cucamonga's City
6 Council elections because it dilutes the opportunity of Latino voters to elect candidates of
7 their choice.

8 23. Patterns of racially polarized voting have the effect of impeding opportunities
9 for Latino voters to elect candidates of their choice to the at-large city council positions in the
10 City of Rancho Cucamonga, where the non-Latino populace dominates elections. For several
11 years, Latino voters have been harmed by racially polarized voting.

12 24. The 1994 election for State Proposition 187, which involved the denial of
13 governmental benefits to persons who could not demonstrate legal residence, was racially
14 polarized in Rancho Cucamonga. Latino voters voted against State Proposition 187, while
15 the rest of the electorate in Rancho Cucamonga, particularly the Non-Hispanic White voters
16 in Rancho Cucamonga, supported the passage of State Proposition 187. Similarly, the 1996
17 election for State Proposition 209, which involved eliminating "affirmative action," was
18 racially polarized in Rancho Cucamonga. Latino voters voted against State Proposition 209,
19 while the Non-Hispanic White portion of the electorate in Rancho Cucamonga supported the
20 passage of State Proposition 209. Similarly, the 1998 election for State Proposition 227,
21 which involved eliminating bilingual education was racially polarized in Rancho Cucamonga.
22 Latino voters voted against State Proposition 227, while the rest of the electorate in Rancho
23 Cucamonga, particularly the Non-Hispanic White voters in Rancho Cucamonga, supported
24 the passage of State Proposition 227. Similarly, the 2003 election for State Proposition 54,
25 which involved eliminating data collection of race and ethnicity was racially polarized in
26 Rancho Cucamonga. Latino voters voted against State Proposition 54, while the Non-
27 Hispanic White voters in Rancho Cucamonga, supported the passage of State Proposition 54.

28

1 manner that impairs the ability of protected classes as defined by the CVRA to elect
2 candidates of their choice or influence the outcome of elections.

3 32. An alternative method of election, such as district-based elections, exists that
4 will provide an opportunity for the members of a protected class as defined by the CVRA to
5 elect candidates of their choice or to influence the outcome of the Rancho Cucamonga City
6 Council elections.

7 33. An actual controversy has arisen and now exists between the parties relating to
8 the legal rights and duties of Plaintiff and Defendants, for which Plaintiff desires a
9 declaration of rights.

10 34. Defendants' wrongful conduct has caused and, unless enjoined by this Court,
11 will continue to cause, immediate and irreparable injury to Plaintiff, and all residents of the
12 City of Rancho Cucamonga.

13 35. Plaintiff and the residents of the City of Rancho Cucamonga have no adequate
14 remedy at law for the injuries they currently suffer and will otherwise continue to suffer.

15
16 **PRAYER FOR RELIEF**

17 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as
18 follows:

19 1. For a decree that the City of Rancho Cucamonga's current at-large method of
20 election for the City Council violates the California Voting Rights Act of 2001;

21 2. For preliminary and permanent injunctive relief enjoining the City of Rancho
22 Cucamonga from imposing or applying its current at-large method of election;

23 3. For injunctive relief mandating the City of Rancho Cucamonga to implement
24 district-based elections, as defined by the California Voting Rights Act of 2001, or other
25 alternative relief tailored to remedy the City of Rancho Cucamonga's violation of the
26 California Voting Rights Act of 2001;

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4. For an award of Plaintiff attorneys' fees, costs, litigation expenses and
prejudgment interest pursuant to the CVRA, Cal. Elec. Code § 14030 and other applicable
law; and

5. For such further relief as the Court deems just and proper.


Respectfully submitted:

DATED: March 10, 2016

**SHENKMAN & HUGHES,
R. REX PARRIS LAW FIRM, and
LAW OFFICES OF MILTON C. GRIMES**



By: Kevin Shenkman
Attorneys for Plaintiff

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Jonathan Douglass, Esq. R. REX FARRIS LAW FIRM 43364 10th Street West Lancaster, CA 93534 State Bar No: 289300 TELEPHONE NO.: (661) 949-2595 FAX NO.: (661) 949-7524 ATTORNEY FOR: <u>Plaintiffs</u>	FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN BERNARDINO SAN BERNARDINO DISTRICT MAR 10 2016 BY  JESSICA MORALES, DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Bernardino STREET ADDRESS: 8303 Haven Avenue MAILING ADDRESS: Same CITY AND ZIP CODE: Rancho Cucamonga, CA 91730 BRANCH NAME: Rancho Cucamonga District	CASE NAME: <u>Southwest Voter Registration Project v. City of Rancho Cucamonga, California, et al.</u> CASE NUMBER: CIVDS1603632 JUDGE: DEPT:
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (48) Other P/IPD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/IPD/W/D (23) Non-P/IPD/W/D (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input checked="" type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/IPD/W/D tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (28) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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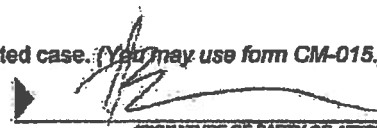
2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties	d. <input type="checkbox"/> Large number of witnesses
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve	e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. <input type="checkbox"/> Substantial amount of documentary evidence	f. <input type="checkbox"/> Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): One (1)

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)
 Date: March 10, 2016
 Jonathan Douglass, Esq. 
 (TYPE OR PRINT NAME) (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO

San Bernardino District - Civil
247 West Third Street

San Bernardino, CA. 924150210

CASE NO: CIVDS1603632

SHENKMAN & HUGHES
28905 WIGHT ROAD
MALIBU CA 90265

NOTICE OF TRIAL SETTING CONFERENCE
and NOTICE OF CASE ASSIGNMENT

IN RE: SOUTHWEST VOTER -V- CITY OF RANCHO

THIS CASE HAS BEEN ASSIGNED TO: Thomas S. Garza IN DEPARTMENT S27
FOR ALL PURPOSES.

Notice is hereby given that the above-entitled case has been set for
Trial Setting Conference at the court located at 247 WEST THIRD STREET
SAN BERNARDINO, CA 92415-0210.

HEARING DATE: 09/13/16 at 8:30 in Dept. S27

DATE: 03/10/16 Christina M. Volkers, Clerk of the Court
By: JESSICA MORALES

CERTIFICATE OF SERVICE

I am a Deputy Clerk of the Superior Court for the County of San
Bernardino at the above listed address. I am not a party to this
action and on the date and place shown below, I served a copy of the
above listed notice:

() Enclosed in a sealed envelope mailed to the interested party
addressed above, for collection and mailing this date, following
standard Court practices.

() Enclosed in a sealed envelope, first class postage prepaid in the
U.S. mail at the location shown above, mailed to the interested party
and addressed as shown above, or as shown on the attached listing.

A copy of this notice was given to the filing party at the counter

A copy of this notice was placed in the bin located at this office
and identified as the location for the above law firm's collection of
file stamped documents.

Date of Mailing: 03/10/16

I declare under penalty of perjury that the foregoing is true and
correct. Executed on 03/10/16 at San Bernardino, CA

BY: JESSICA MORALES

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO

Southwest Voter Registration Education Project

CASE NO.: CIVDS1603632

vs.

CERTIFICATE OF ASSIGNMENT

City of Rancho Cucamonga, California, et al.

A civil action or proceeding presented for filing must be accompanied by this Certificate. If the ground is the residence of a party, name and residence shall be stated.

The undersigned declares that the above-entitled matter is filed for proceedings in the Rancho Cucamonga District of the Superior Court under Rule 404 of this court for the checked reason:

- General Collection

Table with 2 columns: Nature of Action and Ground. Includes 21 categories such as Adoption, Conservator, Contract, etc., with checkboxes and corresponding grounds.

The address of the accident, performance, party, detention, place of business, or other factor which qualifies this case for filing in the above-designed district is:

NAME - INDICATE TITLE OR OTHER QUALIFYING FACTOR ADDRESS Rancho Cucamonga California CITY STATE ZIP CODE

I declare, under penalty of perjury, that the foregoing is true and correct and that this declaration was executed on March 10, 2016 at Lancaster, California

Handwritten signature of attorney/party

Signature of Attorney/Party

CERTIFICATE OF ASSIGNMENT