



# MALDEF

The Latino Legal Voice for Civil Rights in America

**National Headquarters**  
**Los Angeles**  
**Regional Office**  
634 S. Spring Street  
Los Angeles, CA 90014  
Tel: 213.629.2512  
Fax: 213.629.0266

**Chicago**  
**Regional Office**  
11 East Adams Street  
Suite 700  
Chicago, IL 60603  
Tel: 312.427.0701  
Fax: 312.427.0691

**Sacramento**  
**Policy Office**  
1512 14<sup>th</sup> Street  
Sacramento, CA 95814  
Tel: 916.444.3031  
Fax: 916.444.7207

**San Antonio**  
**Regional Office**  
110 Broadway  
Suite 300  
San Antonio, TX 78205  
Tel: 210.224.5476  
Fax: 210.224.5382

**Washington, D.C.**  
**Regional Office**  
1016 16th Street, NW  
Suite 100  
Washington, DC 20036  
Tel: 202.293.2828  
Fax: 202.293.2849

June 21, 2019

**VIA U.S. MAIL & EMAIL**

Christopher Loh, MD, Board President  
Board of Directors, Camarillo Health Care District  
c/o Karen Valentine, Clerk to the Board  
3639 East Las Posas Road  
Suite 117  
Camarillo, CA 93010  
E-mail: [clerktotheboard@camhealth.com](mailto:clerktotheboard@camhealth.com)

Re: Demand for Compliance with California Voting Rights Act

Dear Dr. Loh:

We write on behalf of a Latino voter in the Camarillo Health Care District (the "District") who is concerned that the use of an at-large system for the election of the Board of Directors results in Latino vote dilution and prevents Latino voters from electing candidates of their choice. We reviewed demographic and electoral information pertaining to your jurisdiction with particular attention to the protections of the California Voting Rights Act of 2001 ("CVRA"). Based on our investigation, we believe that the District is in violation of the CVRA and must convert to a by-district election system.

The CVRA, 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[.]

Elec. Code § 14027. Latino residents of the District are a "protected class" within the meaning of the CVRA. United States Census population data shows that Latinos constitute about 20% of the citizen voting age population of the District. However, it appears that none of the five current directors of the Board are Latino, and that no Latino candidate has ever served on the Board. Based on our review of election returns and demographic information, we believe that the lack of success of Latino candidates results from the inability of Latino voters to elect candidates of choice due to racially polarized voting among the electorate, and that continued use of at-large elections therefore violates the CVRA. We demand that the District convert its at-large election system to a



# MALDEF

The Latino Legal Voice for Civil Rights in America

Christopher Loh, MD, Board President

June 21, 2019

**National Headquarters  
Los Angeles**

**Regional Office**  
634 S. Spring Street  
Los Angeles, CA 90014  
Tel: 213.629.2512  
Fax: 213.629.0266

**Chicago  
Regional Office**  
11 East Adams Street  
Suite 700  
Chicago, IL 60603  
Tel: 312.427.0701  
Fax: 312.427.0691

**Sacramento  
Policy Office**  
1512 14<sup>th</sup> Street  
Sacramento, CA 95814  
Tel: 916.444.3031  
Fax: 916.444.7207

**San Antonio  
Regional Office**  
110 Broadway  
Suite 300  
San Antonio, TX 78205  
Tel: 210.224.5476  
Fax: 210.224.5382

**Washington, D.C.  
Regional Office**  
1016 16th Street, NW  
Suite 100  
Washington, DC 20036  
Tel: 202.293.2828  
Fax: 202.293.2849

district-based election system for the next District Board of Directors election in November 2020. Under the authority of Government Code § 10650, the District can effectuate that conversion by passing a resolution, and we demand that it do so without delay.

We request your response to this demand within 45 days of receipt of this letter. In the absence of a satisfactory response, we will 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 attorneys' fees and litigation and expert witness costs.

We look forward to your response.

Sincerely,

Julia A. Gomez  
Staff Attorney  
MALDEF

cc: Richard Loft, MD, Clerk of the Board  
Roger Brown, MBA, Vice President  
Mark Hiepler, Esq., Director  
Tom Doria, MD, Director  
Karen Valentine, Clerk to the Board (via email)