

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
JOAQUIN G. AVILA - 56484
18336 Aurora Avenue North Suite 112, MB 148
Shoreline, WA 98133-4526
TELEPHONE NO.: (415)433-6830
ATTORNEY FOR (Name): Pltfs: Felicitas González, Karmen Grimaldi, Flora Ruiz

FOR COURT USE ONLY
CONFORMED COPY OF ORIGINAL FILED
Los Angeles Superior Court

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS:
MAILING ADDRESS: 111 North Hill St.
CITY AND ZIP CODE: Los Angeles 90012
BRANCH NAME: Stanley Mosk Courthouse

DEC 02 2010
John A. Clarke, Executive Officer/Clerk
By [Signature] Deputy
A. H. LAFLEUR-CLAYTON

CASE NAME:
González et. al. v. City of Compton et. al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000)
 Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter Joinder
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: BC450494
JUDGE:
DEPT.:

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 (46)	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)	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)
Other PI/PD/WD (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 PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/WD (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-PI/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	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)	Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

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. Large number of separately represented parties
 - b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
 - c. Substantial amount of documentary evidence
 - d. Large number of witnesses
 - e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 - f. 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): 1 (Violation of California Voting Rights Act)
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: 12-1-10
Gay Crosthwait Grunfeld
(TYPE OR PRINT NAME)

[Signature]
(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.

SHORT TITLE: González et. al. v. City Of Compton et. al.	CASE NUMBER BC450494
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**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL ¹⁴ HOURS/ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked “Limited Case”, skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office. |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 4. 1., 2., 4. 1., 2., 3. 1., 2., 4.
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input checked="" type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

Non-Personal Injury/Property Damage/
 Wrongful Death Tort (Cont'd.)
 Employment
 Contract
 Real Property
 Unlawful Detainer
 Judicial Review

SHORT TITLE: González et. al. v. City Of Compton et. al.	CASE NUMBER
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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

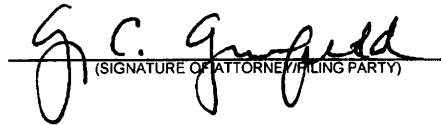
SHORT TITLE: González et. al. v. City Of Compton et. al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: City of Compton 205 S. Willowbrook Avenue Compton, California 90220	
CITY: Compton	STATE: CA	ZIP CODE: 90220	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subds. (b), (c) and (d)).

Dated: 12-15-10


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

**SUMMONS
(CITACION JUDICIAL)**

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OF ORIGINAL FILED**
Los Angeles Superior Court

DEC 02 2010

John A. Clarke, Executive Officer/Clerk
By A.E. LaFleur-Clayton, Deputy
A.E. LaFLEUR-CLAYTON

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

CITY OF COMPTON, CALIFORNIA; ALITA GOODWIN, CITY CLERK, CITY OF COMPTON, CALIFORNIA

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

FELICITAS GONZÁLEZ, KARMEN GRIMALDI and FLORA RUIZ

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 a 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 pueda 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, pida 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 ó 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 desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Superior Court of California,
County of Los Angeles, Stanley Mosk Courthouse
111 North Hill St., Los Angeles 90012

CASE NUMBER:
(Número del Caso): **BC450494**

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):
Gay C. Grunfeld, Rosen, Bien & Galvan, 315 Montgomery St., 10th Fl., San Francisco, CA 94104 (415)433-6830

DATE: **JOHN A. CLARKE, CLERK** Clerk, by **AMBER LaFLEUR-CLAYTON**, 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)).

[SEAL]
DEC 02 2010

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):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
4. by personal delivery on (date):

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Los Angeles Superior Court

DEC 02 2010

John A. Clarke, Executive Officer/Clerk
By A.E. LaFleur-Clayton, Deputy
A.E. LaFLEUR-CLAYTON

1 JOAQUIN G. AVILA – 56484
18336 Aurora Avenue North, Suite 112, MB 148
2 Shoreline, Washington 98133-4526
3 Telephone: (206) 724-3731
4 Facsimile: (206) 546-9171
5 Email: avilaj@seattleu.edu

6 GAY CROSTHWAIT GRUNFELD – 121944
7 BLAKE THOMPSON – 255600
8 ROSEN, BIEN & GALVAN, LLP
9 315 Montgomery Street, 10th Floor
10 San Francisco, California 94104-1823
11 Telephone: (415) 433-6830
12 Facsimile: (415) 433-7104
13 Email: ggrunfeld@rbg-law.com

14 Attorneys for Plaintiffs

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES

17 FELICITAS GONZÁLEZ, KARMEN
18 GRIMALDI and FLORA RUIZ,

19 Plaintiffs,

20 v.

21 CITY OF COMPTON, CALIFORNIA; ALITA
22 GOODWIN, CITY CLERK, CITY OF
23 COMPTON, CALIFORNIA,

24 Defendants.

Case No. _____

BC450494

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

1 Plaintiffs Felicitas González, Karmen Grimaldi and Flora Ruiz (“Plaintiffs”) allege as
2 follows:

3 **NATURE OF THE CASE**

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

12 2. The effects of the City of Compton’s at-large method of election are apparent and
13 compelling. Despite a Latino population of approximately 67.6% in the City of Compton, no
14 Latino has ever been elected to Compton’s City Council. Since 1999 there has been no candidate
15 of choice of Latino voters elected to the Compton City Council. This current absence of any
16 Latinos on the Compton City Council reveals a lack of access to the political process.

17 3. The City of Compton’s at-large method of election violates the CVRA. Plaintiffs
18 bring this action to enjoin the City of Compton’s continued abridgment of Latino voting rights.
19 Plaintiffs seek a declaration from this Court that the at-large method of election currently used by
20 the City of Compton violates the CVRA. Plaintiffs seek injunctive relief enjoining the City of
21 Compton from further imposing or applying its current at-large method of election. Further,
22 Plaintiffs seek injunctive relief requiring the City of Compton to design and implement district-
23 based elections or other alternative relief tailored to remedy Compton’s violation of the CVRA.

24 **PARTIES**

25 4. Plaintiff Felicitas González is a registered voter residing in the City of Compton
26 and is eligible to vote in the City of Compton’s elections. Plaintiff González is Latina and is a
27 member of a protected class under the CVRA.

1 5. Plaintiff Karmen Grimaldi is a registered voter residing in the City of Compton and
2 is eligible to vote in the City of Compton's elections. Plaintiff Grimaldi is Latina and is a
3 member of a protected class under the CVRA.

4 6. Plaintiff Flora Ruiz is a registered voter residing in the City of Compton and is
5 eligible to vote in the City of Compton's elections. Plaintiff Ruiz is Latina and is a member of a
6 protected class under the CVRA.

7 7. Defendant City of Compton, California, is a political subdivision subject to the
8 provisions of the CVRA.

9 8. Defendant Alita Godwin is the City Clerk for the City of Compton, California, and
10 is responsible for conducting elections for the Compton City Council. Defendant Godwin
11 maintains information on registered voters and elections for the City of Compton.

12 JURISDICTION AND VENUE

13 9. All parties hereto are within the unlimited jurisdiction of this Court. The unlawful
14 acts complained of occurred in this County. Venue in this Court is proper.

15 FACTS

16 10. The City of Compton contains approximately 93,955 persons, of which 63,471, or
17 67.6%, were Hispanic or Latino based upon the United States Census Bureau's 2009 American
18 Community Survey One Year Estimates. According to this 2009 Census data, Latinos represent
19 43.4% of the citizen voting age population in Compton.

20 11. The Latino population located within the City of Compton is geographically
21 concentrated.

22 12. The City of Compton is governed by a city council. The Compton City Council
23 serves as the governmental body responsible for the operations of the City of Compton. The City
24 Council is comprised of five members, a mayor and four council members.

25 13. The mayor for the City of Compton and the Compton City Council members are
26 elected pursuant to an at-large method of election. Under this method of election, all of the
27 eligible voters of the entire City of Compton elect the mayor and members to the City Council.
28 Although each of the four City Council members must reside within one of four candidate

1 residency districts, each eligible voter places a vote for a candidate for each of the four candidate
2 residency districts, regardless of where the voter resides.

3 14. Vacancies to the City Council are elected on a staggered basis; as a result, every
4 two years the city electorate elects two City Council members who each serve a four year term.
5 The mayor is elected for a term of four years.

6 15. For the time period from 1999 to 2010, no Latino candidate has been elected to the
7 Compton City Council and no Latino candidate has been elected as City Clerk.

8 16. Plaintiffs are informed and believe that no Latino candidate has ever been elected
9 to the Compton City Council or as City Clerk.

10 17. Elections conducted within the City of Compton are characterized by racially
11 polarized voting. Racially polarized voting occurs when members of a protected class as defined
12 by the CVRA, Cal. Elec. Code § 14025(d), vote for candidates and electoral choices that are
13 different from the rest of the electorate. Racially polarized voting exists within the City of
14 Compton because there is a difference between the choice of candidates or other electoral
15 choices that are preferred by Latino voters and the choice of candidates or other electoral choices
16 that are preferred by voters in the rest of the electorate.

17 18. Racially polarized voting consists both of voter cohesion on the part of Latino
18 voters and of bloc voting by the non-Latino electorate against the choices of Latino voters. Such
19 polarized voting is legally significant in Compton's City Council elections because it dilutes the
20 opportunity of Latino voters to elect candidates of their choice.

21 19. Patterns of racially polarized voting have the effect of impeding opportunities for
22 Latino voters to elect candidates of their choice to the at-large city council positions in the City
23 of Compton, where the non-Latino majority dominates elections. At least since 1994, Latino
24 voters have been harmed by racially polarized voting. At least since 1999, Latino voters in the
25 City of Compton have not elected a single Latino candidate of their choice to any one of the four
26 city council positions and the offices of the Mayor and the City Clerk.

27 20. For the 2001 City of Compton elections, Latinos ran for the offices of mayor, city
28 council member and city clerk. Juan R. Mora is a Latino who ran for the office of mayor.

1 Robert Carrillo is a Latino who ran for City Council District 2. Evaristo Garcia is a Latino who
2 ran for City Council District 3. Elias Acevedo is a Latino who ran for City Clerk. Juan R. Mora,
3 Robert Carrillo, Evaristo Garcia and Elias Acevedo were the Latino candidates of choice in the
4 2001 City of Compton elections. The Latino candidates of choice in the 2001 City of Compton
5 elections were not elected.

6 21. The 2001 City of Compton elections were racially polarized. Latino voters
7 supported the candidacies of Juan R. Mora, Robert Carrillo, Evaristo Garcia and Elias Acevedo.
8 The rest of the electorate did not support the Latino candidates of choice.

9 22. In the 2005 City of Compton elections, Latinos ran for the offices of mayor, city
10 council member and city clerk. Juan R. Mora is a Latino who ran for the office of mayor. Joel
11 Estrada is a Latino who ran for City Council District 2. Evaristo Garcia is a Latino who ran for
12 City Council District 3. Elias Acevedo is a Latino who ran for City Clerk. Joel Estrada, Evaristo
13 Garcia and Elias Acevedo were the Latino candidates of choice in the 2005 City of Compton
14 elections. Mr. Estrada, Mr. Garcia, and Mr. Acevedo were not elected.

15 23. The 2005 City of Compton elections were racially polarized. Latino voters
16 supported the candidacies of Joel Estrada, Evaristo Garcia and Elias Acevedo. The rest of the
17 electorate did not support the Latino candidates of choice.

18 24. In the 2009 City of Compton elections, Latinos ran for the city council. Elias
19 Acevedo is a Latino who ran for City Council District 2. Diana Sanchez is a Latina who ran for
20 City Council District 3. Elias Acevedo and Diana Sanchez were the Latino candidates of choice
21 in the 2009 City of Compton elections. The Latino candidates of choice in the 2009 City of
22 Compton elections were not elected.

23 25. The 2009 City of Compton elections were racially polarized. Latino voters
24 supported the candidacies of Elias Acevedo and Diana Sanchez. The rest of the electorate did
25 not support the Latino candidates of choice.

26 26. The 1994 election for State Proposition 187, which involved the denial of
27 governmental benefits to persons who could not demonstrate legal residence, was racially
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1 polarized in Compton. Latino voters voted against State Proposition 187, while the rest of the
2 electorate in Compton supported the passage of State Proposition 187.

3 27. The at-large method of election and repeated racially polarized voting has caused
4 Latino vote dilution within the City of Compton. Where Latinos and the rest of the electorate
5 express different preferences on candidates and other electoral choices, non-Latino voters, by
6 virtue of their overall numerical supermajority among eligible voters, defeat the preferences of
7 Latino voters.

8 28. The obstacles posed by the City of Compton's at-large method of election, together
9 with racially polarized voting, impair the ability of Latino voters to elect candidates of their
10 choice or to influence the outcome of elections conducted in the City of Compton.

11 29. An alternative method of election exists, such as district-based elections, that will
12 provide an opportunity for the members of the protected class as defined by the CVRA to elect
13 candidates of their choice or to influence the outcome of Compton City Council elections.

14 **FIRST CAUSE OF ACTION**
15 **(Violation of California Voting Rights Act of 2001, Cal. Elec. Code § 14025 et. seq.)**
16 **(Against All Defendants)**

17 30. Plaintiffs refer to and incorporate paragraphs 1 to 29 as though fully set forth
18 herein.

19 31. Plaintiffs are registered voters and reside within the City of Compton, California.
20 Plaintiffs are Latina and are members of a protected class of voters under the CVRA. Plaintiffs
21 are over the age of 18 and are eligible to vote in the City of Compton's elections.

22 32. Defendant City of Compton is a political subdivision within the State of California.

23 33. Defendant City of Compton employs an at-large method of election, where voters
24 of its entire jurisdiction elect members to its City Council.

25 34. Racially polarized voting has occurred, and continues to occur, in elections for
26 members to the City Council for the City of Compton and in elections incorporating other
27 electoral choices by voters of Compton. As a result, the City of Compton's at-large method of
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1 election is imposed in a manner that impairs the ability of Plaintiffs to elect candidates of their
2 choice or influence the outcome of elections.

3 35. An alternative remedy, such as district-based elections, exists that will provide an
4 opportunity for the members of the protected class as defined by the CVRA to elect candidates of
5 their choice or to influence the outcome of Compton City Council elections.

6 36. An actual controversy has arisen and now exists between the parties relating to the
7 legal rights and duties of all Plaintiffs and Defendants, for which all Plaintiffs desire a
8 declaration of rights.

9 37. Defendant's wrongful conduct has caused and, unless enjoined by this Court, will
10 continue to cause, immediate and irreparable injury to Plaintiffs.

11 38. Plaintiffs have no adequate remedy at law for the injuries they currently suffer and
12 will otherwise continue to suffer.

13 **PRAYER FOR RELIEF**

14 Wherefore, Plaintiffs ask this Court to:

15 1. Find that the City of Compton's current at-large method of election for the City
16 Council violates the California Voting Rights Act of 2001;

17 2. Grant preliminary and permanent injunctive relief enjoining the City of Compton
18 from imposing or applying its current at-large method of election;

19 3. Grant injunctive relief mandating the City of Compton to design and implement
20 district-based elections, as defined by the California Voting Rights Act of 2001, or other
21 alternative relief tailored to remedy the City of Compton's violation of the California Voting
22 Rights Act of 2001;

23 4. Grant Plaintiffs attorneys' fees, costs, and prejudgment interest pursuant to the
24 CVRA, Cal. Elec. Code § 14030 and other applicable law; and

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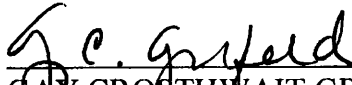
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1 5. Grant Plaintiffs such further relief as the Court deems just and proper.

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3 Dated: November 30, 2010

Respectfully submitted,

ROSEN, BIEN & GALVAN, LLP

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6 By: 
7 GAY CROSTHWAIT GRUNFELD
8 Attorneys for Plaintiffs

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