



**LAW OFFICES OF MELO AND
SARSFIELD LLP**

Mailing:

4216 South Mooney Boulevard
PMB 136
Visalia, California 93277

T (559) 732-3000

Email:

meloandsarsfield@icloud.com

September 15, 2020



Received

SEP 18 2020

ADMN/CITYMGR

City of Clovis
Attn Clerk to the City Council
1033 Fifth St.
Clovis, CA 93612

By Certified US Mail

Re: Notice of Violation of the California Voting Rights Act (CVRA) and Intent to
File Lawsuit.

Dear City Clerk and City Council

The Law Offices of Melo and Sarsfield LLP is a law firm that practices in the area of voting rights law. We represent a group of registered voters who reside within the jurisdictional boundaries of City of Clovis. We have been retained to initiate a lawsuit for the city's violation of the California Voting Rights Act, Election Code Section 14025 et. seq. This lawsuit will be filed in Fresno County Superior Court after the 45 day litigation hold required by AB 350.

The pending lawsuit is based upon the City's illegal use of "at large" voting to elect members of the City Council. The City's use of at-large voting is in violation of the California Voting Rights Act.

At large voting schemes are unfair to minority voters and suppress minority vote turnout in violation of both state and federal election law.

City of Clovis
9/15/2020 Page 2/2

It is self-evident that minority representation on the City Council has been historically lacking.

We would be happy to enter into a consent decree to keep litigation costs down to an absolute minimum. Alternatively, the City can voluntarily agree to go to district elections.

We are aware that the City Council has called for a special "at large" election next March to fill two vacancies. This proposed special election is itself violative of the CVRA. Special elections conducted at off times grossly suppress the minority vote.


Once the 45 day litigation hold expires, our clients will not delay filing the lawsuit unless the City is clearly willing to work with them in good faith to develop a remedial plan.

Please be advised that this letter is the pre-litigation administrative "demand letter" that triggers the 45 day litigation hold pursuant to AB 350 (January 2017) (Election Code § 14025 et seq).

We look forward to hearing from the City in all due haste.

Sincerely,

LAW OFFICES OF MELO AND SARSFIELD LLP

By: 
John Sarsfield, Esq.

cc: Clients