

MAY 09 2017

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14 Attorneys for Plaintiffs

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **COUNTY OF LOS ANGELES**

17 PICO NEIGHBORHOOD
18 ASSOCIATION and MARIA LOYA,)
19 Plaintiffs,)
20 v.)
21 CITY OF SANTA MONICA, and)
DOES 1 through 100, inclusive,)
22 Defendants.)

Case No.: BC616804

**PLAINTIFFS' REQUEST FOR JUDICIAL
NOTICE**

Date: May 22, 2017
Time: 8:45 a.m.
Dept.: 28

1 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF
2 RECORD:

3 Pursuant to Evidence Code Sections 452, 453 and 454, Plaintiffs Maria Loya and Pico Neighborhood
4 Association respectfully request that the Court take judicial notice of the following documents:

5
6 Exhibit 1: File-stamped copy of the Complaint in *Luna v. Kern County*, United States District Court for
7 the Eastern District of California, Case No. 1:16-cv-00568-DAD-JLT; and

8
9 Exhibit 2: Summary of U.S. Census records of the historical demographics of Santa Monica, California.

10
11 “Judicial notice may be taken of the...[r]ecords of... any court of record of the United States...
12 Evid. Code § 452(d). The Complaint in *Luna v. Kern County*, Case No. 1:16-cv-00568-DAD-JLT, that is
13 attached as Exhibit 1 is a record of the United States District Court for the Eastern District of California. The
14 Complaint attached as Exhibit 1 was the subject of the United States District Court for the Eastern District of
15 California’s ruling in *Luna v. Kern County* (E.D. Cal. Sept. 2, 2016) 2016 WL 4679723, denying the
16 defendant’s motion to dismiss. Moreover, that the document attached as Exhibit 1 is the Complaint in *Luna*
17 *v. Kern County* is not subject to reasonable dispute – anyone with a PACER account can confirm the
18 authenticity of that document. Evid. Code § 452(h). Accordingly, Exhibit 1 should be judicially noticed.


19 As Defendant discusses in its Request for Judicial Notice, “the courts of this State have taken judicial
20 notice of Census data for well over a century ... [and] have also taken judicial notice of racial demographic
21 data in CVRA cases. (Defendant’s RJN, p. 5, citing *Moehring v. Thomas* (2005) 126 Cal. App. 4th 1511;
22 1523, fn. 4; *People v. Howard* (1990) 1 Cal. 4th 1132, 1160 & fn. 6; *People v. Harris* (1984) 36 Cal. 3d 3
23 47, fn. 3; *People v. Wong Wang* (1891) 92 Cal. 277, 280; *People ex rel. Stoddard v. Williams* (1883) 64 Cal.
24 87, 91; *Sanchez v. City of Modesto* (2006) 145 Cal. App. 4th 660, 666, fn. 1). The summary of U.S. Census
25 data for Santa Monica, California from 1980-2000, attached as Exhibit 2 is also not subject to reasonable
26 dispute, as that information is available from the U.S. Census Department. Accordingly, Exhibit 2, showing
27 that the Hispanic proportion of Santa Monica has remained fairly constant – 13.0% in 1980, 13.6% in 1990
28 and 13.4% in 2000 – should be judicially noticed.

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DATED: May 9, 2017

Respectfully submitted:

SHENKMAN & HUGHES, PC

By: 

Kevin Shenkman
Attorneys for Plaintiffs

Exhibit 1

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8 *Attorneys for Plaintiffs*

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11
12 OSCAR LUNA, ALICIA PUENTES,
DOROTHY VELASQUEZ, and GARY
13 RODRIGUEZ,

14 Plaintiffs,

15 vs.

16 COUNTY OF KERN, KERN COUNTY
BOARD OF SUPERVISORS, and
17 MICK GLEASON, ZACK SCRIVNER,
MIKE MAGGARD, DAVID COUCH,
18 and LETICIA PEREZ, in their official
capacity as members of the Kern County
Board of Supervisors, and JOHN
19 NILON, in his official capacity as Kern
County Administrative Officer, and
20 MARY B. BEDARD, in her official
capacity as Kern County Registrar of
21 Voters, inclusive,

22 Defendants.

Case No.:

**COMPLAINT FOR INJUNCTIVE AND
DECLARATORY RELIEF**

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INTRODUCTION

1. This Complaint challenges the 2011 redistricting plan of the Kern County Board of Supervisors because it unlawfully discriminates against Plaintiffs in violation of the federal Voting Rights Act, 52 U.S.C. § 10301. This action is filed on behalf of Latino citizens of Kern County whose right to vote has been abridged on the basis of race and national origin. The Kern County redistricting plan denies Latino voters an equal opportunity to elect candidates of their choice.

2. Latinos constitute nearly half of the population of Kern County, and are currently able to elect only one of five Board representatives, in the only district where Latinos comprise more than half of the citizen voting age population. The 2011 redistricting plan divides a second politically cohesive Latino community in the northern part of Kern County into two supervisorial districts, neither one of which has sufficient Latino population to enable Latino voters to elect a candidate of their choice.

3. Plaintiffs seek a declaration from this Court that the redistricting plan violates the Voting Rights Act, an injunction prohibiting Kern County from holding any further elections under this unlawful electoral system, and an order mandating a redistricting plan for the election of members to the Board of Supervisors that comports with the Voting Rights Act, 52 U.S.C § 10301, as well as with all other relevant constitutional and statutory requirements.

JURISDICTION AND VENUE

4. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343 because Plaintiffs seek relief under the Voting Rights Act, 52 U.S.C § 10301. Jurisdiction for Plaintiffs' claim for attorneys' fees, costs, expert witness fees and associated costs and related non-taxable costs is based on 52 U.S.C § 10310(e) and 28 U.S.C. § 1920.

5. Venue is proper in this District under 28 U.S.C. § 1391(b) because relevant and substantial acts occurred and will continue to occur within the Eastern District of California.

PARTIES

Plaintiffs

1 6. Plaintiffs OSCAR LUNA, ALICIA PUENTES, DOROTHY VELASQUEZ, and
2 GARY RODRIGUEZ are Latinos, registered voters, and residents of Kern County.

3 7. Oscar Luna is a Latino citizen of the United States and a resident and registered
4 voter of Kern County, residing in Kern County Supervisorial District 1.

5 8. Alicia Puentes is a Latino citizen of the United States and a resident and registered
6 voter of Kern County, residing in Kern County Supervisorial District 4.

7 9. Dorothy Velasquez is a Latino citizen of the United States and a resident and
8 registered voter of Kern County, residing in Kern County Supervisorial District 1.

9 10. Gary Rodriguez is a Latino citizen of the United States and a resident and
10 registered voter of Kern County, residing in Kern County Supervisorial District 1.

11 **Defendants**

12 11. Defendant KERN COUNTY is a political and geographical subdivision of the
13 State of California established under the laws of the State of California, operating under the laws
14 of the State of California and created for the provision of government services.

15 12. Defendant KERN COUNTY BOARD OF SUPERVISORS is the County's
16 legislative body and is responsible for establishing county policies and the overall administration
17 of the Kern County government.

18 13. Defendants MICK GLEASON, ZACK SCRIVNER, MIKE MAGGARD, DAVID
19 COUCH, and LETICIA PEREZ are members of the Board of Supervisors of Defendant Kern
20 County. Each supervisor is sued in his or her official capacity only.

21 14. Defendant JOHN NILON is the County Administrative Officer for Defendant
22 Kern County and is responsible for enforcing the rules, regulations, and policies and ordinances
23 enacted by Defendant Board of Supervisors, and was responsible for supervising the redistricting
24 map options and public workshops during the 2011 redistricting process undertaken by Defendant
25 Board of Supervisors. Defendant Nilon is sued in his official capacity.

26 15. Defendant MARY B. BEDARD is the Registrar of Voters for Kern County,
27 responsible for conducting county elections in Kern County. Defendant Bedard is sued in her
28

1 official capacity.

2 **FACTUAL ALLEGATIONS**

3 **Demographics and Population of Kern County**

4 16. According to the 2010 United States Census, Kern County had a total population
5 of 839,631, of whom 49% were Latino, 4% were Asian, and 5% were African American. The
6 Latino population had grown significantly in the decade prior to the 2011 redistricting, from 38%
7 to 49% of the total population of Kern.

8 17. The growth of Kern County's Latino population is also reflected in its share of the
9 eligible voting population, i.e., citizens over 18 years of age. The U.S. Census Bureau's
10 American Community Survey ("ACS") 1-year estimate concludes that in 2010, Kern County had
11 a total citizen voting age population ("CVAP") of 476,399, of whom 34% were Latino, a
12 significant increase from the Latino CVAP share of 25% ten years earlier.

13 18. Kern County is divided into five supervisorial districts. Kern County's Latino
14 residents are severely underrepresented on the Board of Supervisors. The only supervisorial
15 district in Kern County to regularly elect a Latino in the last two decades is District 5, currently
16 represented by Leticia Perez.

17 **The 2011 Redistricting Plan**

18 19. Defendant Kern County is required to redistrict its five supervisorial districts every
19 10 years in order to comply with applicable state and federal laws.

20 20. In 2011, the Board of Supervisors held three public hearings on the subject of
21 county redistricting.

22 21. During public hearings, Latino community members submitted a geographically
23 compact and equipopulous plan to Defendant Board of Supervisors that increased the number of
24 districts in which Latinos would constitute a majority of the CVAP from one district to two
25 districts.

26 22. Despite dramatic Latino population growth in the last two decades, and the
27 demonstrable ability to add a second Latino CVAP majority district to reflect that growth,
28

1 Defendant Board of Supervisors adopted a plan that maintained only one Latino majority district
2 – District 5 – and fractured a large and geographically compact Latino community of eligible
3 voters between District 1 and District 4.

4 23. The 2011 redistricting plan went into effect for the 2012 primary and general
5 elections.

6 24. The 2011 redistricting plan violates Section 2 of the Voting Rights Act, 52 U.S.C
7 § 10301, because it impermissibly dilutes the Latino vote in Kern County, allowing the non-
8 Latino majority's bloc voting to defeat the candidates preferred by Latino voters, and deprives
9 Latinos of an equal opportunity to participate in the political process and to elect candidates of
10 their choice.

11 **Racially Polarized Voting in Kern County**

12 25. Elections in Kern County are polarized along racial lines. Polarized voting occurs
13 when members of a protected class prefer candidate choices that are different from the rest of the
14 electorate. Polarized voting occurs in Kern County elections because there is a significant
15 difference in the candidates that are preferred by Latino voters and the candidates that are
16 preferred by non-Latino voters.

17 26. Latino voters in Kern County are politically cohesive, manifested by the higher
18 rates at which Latino voters express their preference for Latino candidates in racially contested
19 elections.

20 27. Non-Latino voters typically vote sufficiently as a bloc to defeat the Latino voters'
21 candidates of choice.

22 28. Racially polarized voting by Kern County voters also occurs in elections for
23 countywide and statewide elective offices.

24 29. Because Latino voters and non-Latino voters express different preferences, Latino
25 voters are unable to elect candidates of choice in supervisorial districts where Latinos do not
26 comprise a majority of the CVAP.

27 30. During the past two decades, voters in District 5, the sole Latino CVAP majority
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1 district, have consistently elected Latino candidates to the Board of Supervisors, including Pete
2 Parra (1996-2004), Michael Rubio (2004-2010), and Leticia Perez (2012-present).

3 **History and Effects of Discrimination in Kern County**

4 31. The electoral districting scheme for the election of the Kern County Board of
5 Supervisors interacts with social and historical conditions to cause an inequality in the
6 opportunity of Latino voters to elect representatives of their choice as compared to non-Latino
7 voters.

8 32. Historically, Latinos in Kern County have been subjected to official voting-related
9 discrimination that includes voting practices or procedures that enhance the opportunity for
10 discrimination against Latino voters.

11 33. Latinos in Kern County bear the effects of longstanding societal, economic, and
12 educational discrimination, effects that are apparent in the areas of education, employment,
13 housing, and health. Such discriminatory effects hinder Latino voters' ability to participate
14 effectively in the political process.

15 34. No Latino candidate has won a supervisorial contest outside of the only Latino
16 CVAP majority district – District 5 – in the past two decades.

17 35. There is, and has historically been, a lack of responsiveness on the part of County
18 Supervisors to the particularized needs of the Latino residents of Kern County.

19 36. The policies underlying Defendants' failure to enact a 2011 redistricting plan that
20 fairly reflected the Latino population growth during the prior decade are tenuous.

21 **FIRST CAUSE OF ACTION**

22 **VIOLATION OF SECTION 2 THE VOTING RIGHTS ACT OF 1965**

23 37. Plaintiffs re-allege and incorporate by reference the allegations set forth in all prior
24 paragraphs of this Complaint.

25 38. Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, is applicable to Kern
26 County.

27 39. The Latino population in Kern County is sufficiently numerous and geographically
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1 compact such that two properly apportioned electoral districts can be drawn in which Latinos
2 would constitute a majority of the CVAP.

3 40. Racially polarized voting persists in elections of members to the Board of
4 Supervisors. Non-Latino voters typically vote as a bloc to defeat the Latino voters' candidates of
5 choice.

6 41. The 2011 redistricting plan results in a denial or abridgment of the right to vote of
7 Plaintiffs on account of their race, color, or ethnicity, by having the effect of canceling out or
8 minimizing their individual voting strength in County Board of Supervisor elections. The 2011
9 redistricting plan does not afford Plaintiffs an equal opportunity to participate in the political
10 process and elect candidates of their choice equal to that afforded other members of the
11 electorate, diluting Latino voting strength in violation of Section 2 of the Voting Rights Act, 52
12 U.S.C. § 10301.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiffs respectfully pray that this Court enter Judgment granting
15 Plaintiffs:

16 1. A declaratory judgment that the redistricting plan violates the rights of Plaintiffs as
17 secured by the Voting Rights Act, 52 U.S.C. § 10301;

18 2. Permanent injunctive relief preventing the Defendants and their officers, agents,
19 and employees, successors in office and all other persons in active concert and participation with
20 them, from conducting future elections for Kern County Board of Supervisors under the unlawful
21 redistricting plan;

22 3. An Order of this Court adopting a redistricting plan for the election of members to
23 the Board of Supervisors that comports with the Voting Rights Act, 52 U.S.C. § 10301, as well as
24 all other relevant constitutional and statutory requirements;

25 4. The costs of this suit, including reasonable attorneys' fees, under 52 U.S.C §
26 10310 (e) and 28 U.S.C. 1920; and

27 5. Such other and further relief as the Court may deem just and proper.
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1 Dated: April 22, 2016

Respectfully submitted,

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3 MEXICAN AMERICAN LEGAL DEFENSE AND
EDUCATION FUND

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5 Thomas A. Saenz
6 Denise Hulett
7 Matthew J. Barragan

Attorneys for Plaintiffs

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The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
 Oscar Luna, Alicia Puentes, Dorothy Velasquez, and Gary Rodriguez

(b) County of Residence of First Listed Plaintiff Kern
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
 Thomas A. Saenz; Denise Hulett; Matthew J. Barragan
 Mexican American Legal Defense and Educational Fund
 634 S. Sprint Street, 1st Floor
 Los Angeles, CA 90014

DEFENDANTS
 County of Kern, Kern County Board of Supervisors, and Mick Gleason, Zack Scrivner, Mike Maggard, David Couch, and Leticia Perez, members of the Kern County Board of Supervisors, and Kern County Administrative Officer John Nilon, and Kern County Registrar of Voters Mary B. Bedard

County of Residence of First Listed Defendant Kern
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendants)
 (For Diversity Cases Only)

Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veterans' Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 850 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input checked="" type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	PERSONAL FREEDOMS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	GENERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 52 U.S.C. § 10301

Brief description of cause:
 Kern County's 2011 redistricting plan violates section 2 of the federal Voting Rights Act

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 4/22/16 SIGNATURE OF ATTORNEY OF RECORD [Signature]

FOR OFFICE USE ONLY: RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Exhibit 2

SOCDS Census Data: Output for Santa Monica city, CA

Simmbase071\$

NOTE: Racial and Ethnic Characterizations in the 1970 Census do not match those in the 1980, 1990, and 2000 Censuses. Therefore, Race/Ethnicity data are only reported for 1980,1990, and 2000. For 2000 data, "White, Non-Hispanic" and "Black, Non-Hispanic" include only persons identifying themselves as "White alone" and "Black or African American alone" respectively. "Other Races, Non-Hispanic" includes those identifying themselves as "American Indian and Alaska Native alone", "Asian alone", "Native Hawaiian and Other Pacific Islander alone", "some other race alone", or of more than one race.

Population by Race/Ethnicity

		Los Angeles - Long Beach, CA PMSA	Suburban place of: Santa Monica city, CA	Suburbs*
White, Non-Hispanic	1980	3,953,603	68,435	2,183,489
	1990	3,634,722	65,337	1,983,173
	2000	2,959,614	60,482	1,592,890
Black, Non-Hispanic	1980	926,360	3,492	365,077
	1990	946,862	3,830	398,434
	2000	901,472	3,081	395,391
Other Races, Non-Hispanic	1980	531,437	4,902	260,056
	1990	975,464	5,896	552,193
	2000	1,416,039	9,217	837,391
Total Hispanic (All Races)	1980	2,066,103	11,485	1,174,120
	1990	3,306,116	11,842	1,785,651
	2000	4,242,213	11,304	2,284,670

Race/Ethnicity Groups as Percent of Total Population

		Los Angeles - Long Beach, CA PMSA	Suburban place of: Santa Monica city, CA	Suburbs*
White, Non-Hispanic	1980	52.9	77.5	54.8
	1990	41.0	75.2	42.0
	2000	31.1	71.9	31.2
Black, Non-Hispanic	1980	12.4	4.0	9.2
	1990	10.7	4.4	8.4

	2000	9.5	3.7	7.7
Other Races, Non-Hispanic	1980	7.1	5.6	6.5
	1990	11.0	6.8	11.7
	2000	14.9	11.0	16.4
Total Hispanic (All Races)	1980	27.6	13.0	29.5
	1990	37.3	13.6	37.8
	2000	44.6	13.4	44.7

Foreign Born Population

		Los Angeles - Long Beach, CA PMSA	Suburban place of: Santa Monica city, CA	Suburbs*
Total Foreign Born	1970	787,629	13,929	342,421
	1980	1,664,793	19,376	781,199
	1990	2,895,066	21,990	1,409,125
	2000	3,449,444	20,891	1,745,803
Foreign Born as Percent of Total Population	1970	11.2	15.8	9.1
	1980	22.3	21.9	19.6
	1990	32.7	25.3	29.9
	2000	36.2	24.8	34.2

[View This Table According to Core Based Statistical Area \(2000 Standard\)](#)

*Suburb data are defined as the total for the Los Angeles-Long Beach, CA PMSA less the sum of data for these cities: [Lancaster city, CA](#) ; [Long Beach city, CA](#) ; [Los Angeles city, CA](#) ; [Pasadena city, CA](#) ; click a highlighted city to see its Race/Ethnicity table.

[Select a Different Table](#)

[SOCDS Home](#) | [SOCDS Census Data Home](#) | [Select Different State\(s\) or Metropolitan Area\(s\)](#) | [Select Different Cities in California](#)

Send comments or report errors to: Alstair.W.Mcfarlane@hud.gov

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 28905 Wight Rd., Malibu, California 90265.

On May 9, 2017, I served true copies of the following document(s) described as

REQUEST FOR JUDICIAL NOTICE;

on the interested parties in this action as follows:

George Brown, William Thomson and Tiuania Bedell
Gibson Dunn & Crutcher LLP
333 S. Grand Ave.
50th Floor
Los Angeles, CA 90071

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Shenkman & Hughes' practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 9, 2017 at Malibu, California.



Kevin Shenkman