



**LAW OFFICES OF MELO AND  
SARSFIELD LLP**

**Mailing:**

4216 South Mooney Boulevard  
PMB 136  
Visalia, California 93277

T (559) 732-3000  
F (559) 732-3005

**Email:**

[meloandsarsfield@icloud.com](mailto:meloandsarsfield@icloud.com)

**Web:**

[melo-sarsfieldlaw.com](http://melo-sarsfieldlaw.com)

August 8, 2017

Sequoia Healthcare District  
AKA Sequoia Hospital  
Attn: Mr. Lee Michelson, CEO  
Attn: Clerk to the Board of Directors  
525 Veterans Boulevard  
Redwood City, CA 94063

By Certified US Mail and Facsimile (650) 421-2159

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

Dear Mr. Michelson and Clerk to the Board:

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 voters who reside within the jurisdictional boundaries of Sequoia Healthcare District. We have been retained to initiate a lawsuit for the District's violation of the California Voting Rights Act, Election Code Section 14025 et. seq. This lawsuit will be filed in San Mateo County Superior Court after the 45 day litigation hold required by AB 350.

The pending lawsuit is based upon the District's illegal use of "at large" voting to elect members of the Board of Directors. The District 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. It should also be noted that since the passages of the CVRA in 2001, no governmental agency sued has ever prevailed where racially polarized voting has been shown.

It is self-evident that minority representation on the District Board 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 District can voluntarily agree to go to district elections, with the same advantage to the taxpayers.

However, once the 45 day litigation hold expires, our clients will not delay filing the lawsuit unless the District 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 District in all due haste and working with you to remedy this situation in a cooperative and efficient manner.

Sincerely,

LAW OFFICES OF MELO AND SARFIELD LLP

By: Marguerite Melo  
Marguerite Melo, Esq.

cc: Clients