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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO – HALL OF JUSTICE

CAROL CHANG; and LISA MONTES,	}	CASE NO. 37-2022-00007013-CU-WMA-CTL
Plaintiffs and Petitioners,		
vs.	}	VERIFIED COMPLAINT FOR
		DECLARATORY AND INJUNCTIVE
SAN DIEGUITO UNION HIGH SCHOOL DISTRICT;	}	RELIEF AND PETITION FOR WRIT
and DOES 1 through 100,		OF MANDATE
Defendants and Respondents.	}	

Plaintiffs and Petitioners CAROL CHANG and LISA MONTES ("Plaintiffs") allege as follows:

Parties

1. Plaintiffs are taxpayers, are registered voters, and reside within the geographic jurisdiction of Defendant and Respondent SAN DIEGUITO UNION HIGH SCHOOL DISTRICT ("SDUHSD"). Plaintiff CAROL CHANG is a resident of the City of San Diego, identifying as Asian American; and Plaintiff LISA MONTES is a resident of the City of Solana Beach, identifying as Hispanic/Latina.

2. SDUHSD is a union high-school district formed and operating under the laws of the State of California.

3. The true names and capacities of the Defendant/Respondents identified as DOES 1 through 100 are unknown to Plaintiffs, who will seek the Court's permission to amend this pleading in order to allege the true names and capacities as soon as they are ascertained. Plaintiffs are informed and believe and on that basis allege that each of the fictitiously named Defendants/Respondents 1

1 through 100 has jurisdiction by law over one or more aspects of the subject matter of this lawsuit or has
2 some other cognizable interest in the subject matter of this lawsuit.

3 **Background Information**

4 4. At all times relevant to this lawsuit, Education Code Section 5019(a)(1) has provided
5 as follows: "In any school district or community college district, the county committee on school district
6 organization may establish trustee areas, rearrange the boundaries of trustee areas, abolish trustee areas,
7 and increase to seven from five, or decrease from seven to five, the number of members of the
8 governing board, or adopt one of the alternative methods of electing governing board members specified
9 in Section 5030."

10 5. At all times relevant to this lawsuit, Education Code Section 5019.5 has provided as
11 follows:

12 (a) Following each decennial federal census, and using population
13 figures as validated by the Demographic Research Unit of the
14 Department of Finance as a basis, the governing board of each school
15 district or community college district in which trustee areas have been
16 established, and in which each trustee is elected by the residents of the
17 area the trustee represents, shall adjust the boundaries of any or all of the
18 trustee areas of the district so that one or both of the following
19 conditions is satisfied:

17 (1) The population of each area is, as nearly as may be, the same
18 proportion of the total population of the district as the ratio that the
19 number of governing board members elected from the area bears to the
20 total number of members of the governing board.

19 (2) The population of each area is, as nearly as may be, the same
20 proportion of the total population of the district as each of the other
21 areas.

21 (b) The boundaries of the trustee areas shall be adjusted by the governing
22 board of each school district or community college district, in
23 accordance with subdivision (a), before the first day of March of the year
24 following the year in which the results of each decennial census are
25 released. If the governing board fails to adjust the boundaries before the
26 first day of March of the year following the year in which the results of
27 each decennial census are released, the county committee on school
28 district organization shall do so before the 30th day of April of the same
year. The governing board of the school district or community college
district shall reimburse all reasonable costs incurred by a county
committee in adjusting the boundaries pursuant to this subdivision.

(c) Except to the extent that the adjustment of trustee area boundaries is
necessary for the purposes set forth in this section, the authority to
establish or abolish trustee areas, rearrange the boundaries of trustee

1 areas, increase or decrease the number of members of the governing
2 board, or adopt any method of electing governing board members may
be exercised only as otherwise provided under this article.

3 6. At all times relevant to this lawsuit, SDUHSD has employed a system for the election
4 of trustee-members of its governing board from trustee areas. Under the system, SDUHSD's entire
5 geographic jurisdiction has been divided into five trustee areas, as depicted on what is commonly
6 known as the "Cranberry Map," and one member residing in each trustee area has been elected by the
7 registered voters of that particular trustee area. Attached hereto as Exhibit 1 is a true and correct copy
8 of the Cranberry Map.

9 7. Over the last couple years, SDUHSD's governing board has become fractured by a 3-to-2
10 vote on multiple topics and the board members in the majority have become openly hostile toward the
11 board members in the minority. The majority recently misused the statutorily required procedure for
12 **adjusting** the boundaries of SDUHSD's five trustee areas in order to give the majority's members an
13 electoral advantage in upcoming elections, and to put the minority's two members at a disadvantage,
14 by altogether **rearranging** the boundaries instead. The majority did so despite the requirement in
15 Education Code Section 5019.5(c) that any rearrangement of trustee areas be done in accordance with
16 other applicable statutory provisions in Section 5000 *et seq.*, and in particular the Legislature's decision
17 (i) to give the county committee on school district organization the exclusive authority to rearrange
18 trustee areas pursuant to Section 5019 and (ii) to deprive SDUHSD's governing board of the power to
19 rearrange trustee areas.

20 8. On February 17, 2022, the three-member majority of SDUHSD's governing board failed
21 to **adjust** the boundaries of SDUHSD's five trustee areas and instead approved a map that **rearranges**
22 the boundaries of these areas (the "Rearranged Map"). Attached hereto as Exhibit 2 is true and correct
23 copy of the Rearranged Map. The majority's approval of the Rearranged Map has several adverse
24 consequences that go beyond a mere **adjustment** of the trustee areas and amount to the **rearrangement**
25 thereof, in violation of Education Code Section 5019.5. By way of example and not limitation:

26 A. The residents in trustee areas 1 and 4 now have two representatives on
27 SDUHSD's governing board, whereas the residents in trustee areas 2 and 5 no longer have any
28 representative on the board. According to the legend on the Rearranged Map, stars (*i.e.*, the "★")

symbol) represent where the five current trustees live. The yellow-colored area on the Rearranged Map (depicting new trustee area 1) shows two stars, the blue-colored area (depicting new trustee area 4) has two stars, but the green-colored area (depicting new trustee area 2) and the lavender-colored area (depicting new trustee area 5) have not a single star.

B. Relatedly, the Rearranged Map gerrymanders (salmon-colored) trustee area 3 in order to punish the board member who was specially elected in 2021 to represent the residents of the Cranberry Map's trustee area 5 – one of the two members of the governing board's minority – and force her to run for re-election in a trustee area where she does not have the same level of connection to the residents and community she was elected to represent. The Rearranged Map shows trustee area 3 narrowly and pointedly reaching to the southeast, substantially below State Route 56 (also known as the Ted Williams Freeway) and without using major roadways or natural geographical features as dividing lines, in order to encompass the residence of the member elected to represent trustee area 5 under the Cranberry Map (and, as noted above, leaving the (lavender-colored) new trustee area 5 without a representative).

C. The Rearranged Map changes the election cycle for the five trustee areas by flip-flopping the numbering of trustee areas. Under the Cranberry Map, SDUHSD's governing board members from trustee areas 2 and 4 would be elected by the voters in the respective areas every four years at the general election coinciding with the Presidential election (*e.g.*, 2020, 2024, etc.), and board members from trustee areas 1, 3, and 5 would be elected by the voters in the respective areas every four years at the general election coinciding with the mid-term election (*e.g.*, 2018, 2022, etc.). However, the Rearranged Map¹ shows that a substantial number of voters who would have voted in 2020 as residents of what was then trustee area 2 or 4 will now vote as residents of what is now trustee area 1, 3, or 5 in 2022, a mere two years after they voted in 2020; and that a substantial number of voters who have not voted since 2018 as residents of what was then trustee area 1, 3, and 5 will now vote as

¹ The five purple numbers "1" through "5" and the five thick broken purple lines on the Rearranged Map refer to the prior trustee-area numbers used on the Cranberry Map. Whereas the Cranberry Map numbered the trustee areas starting in the upper left-hand corner and went clockwise, the Rearranged Map numbers the trustee areas starting in the upper right-hand corner and goes counter-clockwise. By rearranging the numbering of the trustee areas, SDUHSD's governing board will effectively allow a substantial number of residents to vote sooner and force a substantial number of residents to wait to vote more than the customary four years.

1 residents of what is now trustee area 2 or 4 but not until 2024, a whopping six years after they voted in
2 2018.

3 D. Relatedly, the Rearranged Map gerrymanders (yellow-colored) trustee area 1 and
4 (green-colored) trustee area 2 and flip-flops their numbering compared to the Cranberry Map in order
5 to punish the board member who was elected in 2020 to represent the residents of the Cranberry Map's
6 trustee area 2 – the second member of the governing board's minority – and force her to run for re-
7 election in 2022 even though her term expires in 2024 pursuant to Elections Code Section 22000(e)(1).
8 Because SDUHSD will continue to hold elections for members representing trustee areas 2 and 4 at the
9 same time as the Presidential election and for members representing trustee areas 1, 3, and 5 at the same
10 time as the mid-term election, the member who was elected in 2020 to represent the residents and
11 community within the Cranberry Map's trustee area 2 must now run for re-election in the Rearranged
12 Map's trustee area 1 in 2022 – two years earlier than under the Cranberry Map – if she wants to run for
13 re-election as an incumbent.

14 9. In addition, rearranging the boundaries of the five trustee areas under the Rearranged
15 Map had the following illegal effects (in violation of both Education Code Section 5019.5 and the
16 federal and state constitutions) compared to the boundaries under the Cranberry Map:

17 A. Substantially dividing – in the voting-rights vernacular, “cracking” – the
18 Hispanic/Latino population by reducing its percentage in the Rearranged Map's trustee areas 1 and 3
19 compared to the Cranberry Map's trustee areas 1 and 3; and substantially increasing the Hispanic/Latino
20 population in – that is, “packing” the population into – the Rearranged Map's trustee area 2 compared
21 to the Cranberry Map's trustee area 2.

22 B. Substantially dividing – that is, cracking – the Asian population by reducing its
23 percentage in the Rearranged Map's trustee area 4 compared to the Cranberry Map's trustee area 4.

24 C. Substantially increasing the White population in – that is, packing it into – the
25 Rearranged Map's trustee area 4 compared to the Cranberry Map's trustee area 4 and thereby diluting
26 the influence of the Asian population in future trustee area 4 elections.

27 10. It was entirely possible to adjust the boundaries of SDUHSD's trustee areas without
28 violating Education Code Section 5019.5, the federal and state constitutions, or any other law. Using

1 recent federal census data that SDUHSD's lawyers presented to the public during two meetings in
2 January 2022, SDUHSD's demographers initially prepared at least three maps – known as Scenario 1,
3 Scenario 2, and Scenario 3 – that lawfully adjusted the five trustee areas' boundaries. Furthermore, one
4 of the three map finalists considered by SDUHSD's governing board on February 17, 2022 – Scenario
5 1C – also lawfully adjusted the five boundaries. Attached hereto as Exhibits 3 and 4 are true and correct
6 copies of the two public presentations made by SDUHSD's lawyers; attached hereto as Exhibit 5 is a
7 true and correct copy of the demographers' three initial lawful maps; and attached hereto as Exhibit 6
8 is a true and correct copy of the demographers' final lawful map.

9 **Jurisdiction and Exhaustion of Administrative Remedies**

10 11. Plaintiffs seek review by and relief from this Court under the U.S. Constitution, the
11 California Constitution, and Code of Civil Procedure Sections 1060 *et seq.* and 1084 *et seq.*, among
12 other provisions of law.

13 12. Plaintiffs exhausted administrative remedies to the extent required by law; alternatively,
14 the exhaustion of remedies was excused.

15 13. The conduct of Defendants/Respondents in approving the Rearranged Map without
16 complying with all applicable laws constitutes a prejudicial abuse of discretion because, as alleged in
17 this pleading, Defendants/Respondents failed to proceed in the manner required by law and made
18 findings not supported by substantial evidence.

19 14. Plaintiffs have no plain, speedy, and adequate remedy in the ordinary course of law, since
20 they and other members of the public will suffer irreparable harm as a result of the violations by
21 Defendants/Respondents of applicable laws. Approval of the Rearranged Map rests on the failure by
22 Defendants/Respondents to satisfy a clear, present, ministerial duty to act in accordance with all
23 application laws. Even when Defendants/Respondents are permitted or required by law to exercise their
24 discretion in taking such actions under those laws, they remain under a clear, present, ministerial duty
25 to exercise their discretion within the limits of and in a manner consistent with those laws.
26 Defendants/Respondents have had and continue to have the capacity and ability to take such actions
27 within the time limits of and in a manner consistent with those laws, but Defendants/Respondents have
28

1 failed and refuse to do so and have exercised their discretion beyond the limits of and in a manner that
2 is not consistent with those laws.

3 15. Plaintiffs have a beneficial right and interest in the fulfillment by Defendants/
4 Respondents of all legal duties, as alleged in this pleading.

5 **FIRST CAUSE OF ACTION:**
6 **Violation of Education Code**
(Against All Defendants/Respondents)

7 16. Paragraphs 1 through 15 are fully incorporated into this paragraph.

8 17. The Rearranged Map does not constitute an “adjust[ment]” of the boundaries of
9 SDUHSD’s trustee areas within the meaning of Education Code Section 5019.5, and the Rearranged
10 Map’s approval exceeds the governing board’s legal authority.

11 18. At this time, there is a dispute between Plaintiffs and Defendants/Respondents over the
12 Rearranged Map’s legal force and effect. Plaintiffs contend that the Rearranged Map has no legal force
13 or effect because it violates one or more applicable laws. Defendants/Respondents dispute Plaintiffs’
14 contention. The parties therefore require a judicial determination of the Rearranged Map’s legal force
15 and effect (if any).

16 **SECOND CAUSE OF ACTION:**
17 **Violation of Equal Protection**
(Against All Defendants/Respondents)

18 19. Paragraphs 1 through 18 are fully incorporated into this paragraph.

19 20. The Rearranged Map violates the equal-protection and other civil rights of Plaintiffs and
20 other similarly situated persons who reside within SDUHSD’s geographical jurisdiction.

21 21. At this time, there is a dispute between Plaintiffs and Defendants/Respondents over the
22 Rearranged Map’s legal force and effect. Plaintiffs contend that the Rearranged Map has no legal force
23 or effect because it violates one or more applicable laws. Defendants/Respondents dispute Plaintiffs’
24 contention. The parties therefore require a judicial determination of the Rearranged Map’s legal force
25 and effect (if any).

26 **Prayer**

27 FOR ALL THESE REASONS, Plaintiffs respectfully pray for the following relief against all
28 Defendants/Respondents (and any all other parties who may oppose Plaintiffs in this lawsuit):

1 A. *On the First Cause of Action:*

2 1. A judgment or other appropriate order determining or declaring that
3 Defendants/Respondents failed to fully comply with one or more other applicable laws as they relate
4 to the Rearranged Map and that there must be full compliance therewith before final approval and
5 implementation of any successor to the Cranberry Map;

6 2. A judgment or other appropriate order determining or declaring that
7 Defendants/Respondents failed to comply with one or more other applicable laws as they relate to the
8 Rearranged Map and that its approval and implementation were illegal in at least some respect,
9 rendering the approval and implementation null and void; and

10 3. Injunctive relief prohibiting Defendants/Respondents (and any and all persons
11 acting at the request of, in concert with, or for the benefit of one or more of them) from taking any
12 action on any aspect of, in furtherance of, or otherwise based on the Rearranged Map unless and until
13 Defendants/Respondents comply with all applicable laws, as determined by the Court.

14 B. *On the Second Cause of Action:*

15 1. A judgment or other appropriate order determining or declaring that
16 Defendants/Respondents failed to fully comply with one or more other applicable laws as they relate
17 to the Rearranged Map and that there must be full compliance therewith before final approval and
18 implementation of any successor to the Cranberry Map;

19 2. A judgment or other appropriate order determining or declaring that
20 Defendants/Respondents failed to comply with one or more other applicable laws as they relate to the
21 Rearranged Map and that its approval and implementation were illegal in at least some respect,
22 rendering the approval and implementation null and void; and

23 3. Injunctive relief prohibiting Defendants/Respondents (and any and all persons
24 acting at the request of, in concert with, or for the benefit of one or more of them) from taking any
25 action on any aspect of, in furtherance of, or otherwise based on the Rearranged Map unless and until
26 Defendants/Respondents comply with all applicable laws, as determined by the Court.

27 C. Any and all other relief that may be authorized by law but is not explicitly or specifically
28 requested elsewhere in this Prayer.

1 D. Any and all legal fees and other expenses incurred by Plaintiffs in connection with this
2 lawsuit, including but not limited to reasonable attorney fees as authorized by the Code of Civil
3 Procedure.

4 E. Any and all further relief that this Court may deem appropriate.

5 Dated: February 21, 2022.

Respectfully submitted,

6 BRIGGS LAW CORPORATION

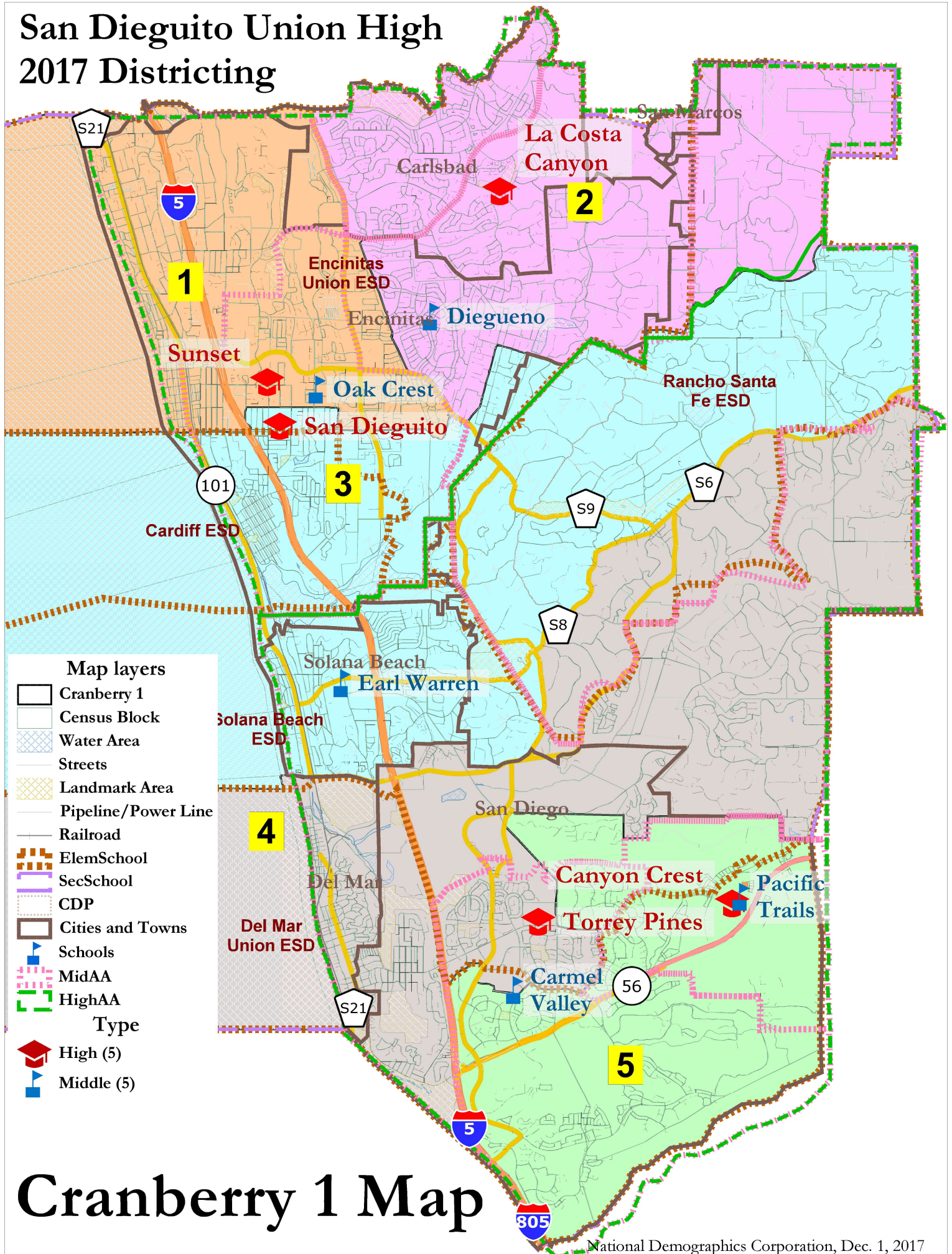
7 By: Cory J. Briggs
8 Cory J. Briggs

9 Attorney for Plaintiffs and Petitioners Carol
10 Chang and Lisa Montes

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE**

Exhibit 1

San Dieguito Union High 2017 Districting



Cranberry 1 Map

San Dieguito Union High - Cranberry 1 Map							
District		1	2	3	4	5	Total
Ideal	Total Pop	32,920	33,240	33,123	33,226	33,330	165,839
33,168	Deviation from ideal	-248	72	-45	58	162	410
	% Deviation	-0.75%	0.22%	-0.14%	0.17%	0.49%	1.24%
Total Pop	% Hisp	14%	9%	14%	6%	8%	10%
	% NH White	79%	81%	79%	76%	62%	75%
	% NH Black	1%	1%	1%	1%	1%	1%
	% Asian-American	5%	8%	5%	15%	28%	12%
Voting Age Pop	Total	26,888	23,944	26,643	25,932	22,517	125,924
	% Hisp	12%	8%	13%	6%	7%	9%
	% NH White	81%	83%	81%	79%	64%	78%
	% NH Black	1%	1%	1%	1%	1%	1%
Citizen Voting Age Pop	% Asian-American	5%	7%	4%	14%	27%	11%
	Total	25,983	23,984	25,612	23,851	19,796	119,226
	% Hisp	9%	7%	8%	8%	7%	8%
	% NH White	84%	84%	86%	80%	64%	80%
Voter Registration (Nov 2014)	% NH Black	1%	1%	1%	2%	2%	1%
	% Asian/Pac.Isl.	6%	7%	4%	9%	26%	10%
	Total	21,363	22,293	21,734	20,999	17,135	103,524
	% Latino est.	7%	6%	7%	4%	5%	6%
Voter Turnout (Nov 2014)	% Asian-Surnamed	3%	3%	2%	6%	16%	6%
	% Filipino-Surnamed	0%	0%	0%	1%	1%	1%
	% Spanish-Surnamed	6%	5%	6%	4%	5%	5%
	% NH White est.	88%	88%	90%	88%	76%	86%
	% NH Black	1%	1%	0%	1%	1%	1%
	Total	11,183	11,637	11,590	11,947	8,907	55,264
Voter Turnout (Nov 2012)	% Latino	5%	5%	5%	3%	4%	4%
	% Asian-Surnamed	2%	3%	2%	5%	14%	5%
	% Filipino-Surnamed	0%	0%	0%	0%	1%	0%
	% Spanish-Surnamed	4%	4%	4%	2%	3%	4%
	% NH White est.	91%	90%	92%	90%	79%	89%
	% NH Black	1%	1%	0%	1%	1%	1%
ACS Pop. Est.	Total	17,666	18,712	18,514	18,140	14,282	87,315
	% Latino	6%	6%	5%	4%	5%	5%
	% Asian-Surnamed	2%	3%	2%	5%	13%	5%
	% Filipino-Surnamed	0%	0%	0%	1%	1%	0%
	% Spanish-Surnamed	6%	5%	5%	3%	4%	5%
	% NH White est.	90%	90%	91%	89%	81%	88%
Age	% NH Black est.	1%	1%	0%	1%	1%	1%
	Total	34,019	33,773	35,263	34,611	35,191	172,857
	age0-19	21%	28%	22%	25%	33%	26%
	age20-60	53%	53%	53%	53%	56%	54%
Immigration	age60plus	26%	20%	25%	22%	10%	21%
	immigrants	14%	12%	14%	25%	32%	19%
Language spoken at home	naturalized	57%	62%	51%	50%	57%	55%
	english	83%	87%	84%	73%	63%	78%
Language Fluency	spanish	10%	6%	10%	7%	7%	8%
	asian-lang	3%	3%	2%	10%	20%	8%
Education (among those age 25+)	other lang	4%	5%	5%	10%	10%	7%
	Speaks Eng. "Less than Very Well"	6%	4%	6%	8%	11%	7%
Child in Household	hs-grad	35%	37%	32%	23%	19%	29%
	bachelor	34%	34%	35%	36%	31%	34%
Work (percent of pop age 16+)	graduatedegree	25%	26%	27%	39%	48%	33%
	child-under18	24%	39%	27%	33%	49%	34%
Household Income	employed	59%	59%	60%	60%	65%	60%
	Commute on Public Transit	2%	1%	2%	1%	1%	1%
Housing Stats	income 0-25k	17%	13%	12%	9%	10%	12%
	income 25-50k	14%	11%	14%	10%	7%	11%
Total and Voting Age population data from the 2010 Decennial Census.	income 50-75k	14%	11%	13%	11%	7%	11%
	income 75-200k	40%	44%	37%	45%	45%	42%
	income 200k-plus	15%	22%	23%	25%	31%	23%
	single family	72%	85%	74%	71%	73%	75%
	multi-family	28%	15%	26%	29%	27%	25%
	vacant	9%	4%	10%	10%	4%	8%
Surname-based Voter Registration and Turnout data from the California Statewide Database.	occupied	91%	96%	90%	90%	96%	92%
	rented	41%	21%	38%	32%	33%	33%
Latino voter registration and turnout data are Spanish-surname counts adjusted using Census Population Department undercount estimates. NH White and NH Black registration and turnout counts estimated by NDC. Citizen Voting Age Pop, Age, Immigration, and other demographics from the 2011-2015 American Community Survey and Special Tabulation 5-year data.	owned	59%	79%	62%	68%	67%	67%

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE**

Exhibit 2

SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 8



- ## Conceptual Trustee Areas

- | Trustee Area | Total Population
(2020 Census) | Variance | Population Age 18 and Over
(2020 Census) | Citizen Voting Age Population
(2015-2019 Estimate) |
|----------------|-----------------------------------|-------------|---|---|
| Trustee Area 1 | 35,681 | -2.8% | 27,340 | 26,277 |
| Trustee Area 2 | 37,154 | 1.2% | 30,336 | 27,402 |
| Trustee Area 3 | 37,831 | 3.0% | 29,902 | 26,931 |
| Trustee Area 4 | 35,890 | -2.3% | 28,631 | 26,500 |
| Trustee Area 5 | 37,043 | 0.9% | 26,887 | 19,633 |
| Total | 183,599 | 5.9% | 143,096 | 126,743 |



SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 8

Total Population:	183,599	Ideal Population:	36,720	Variance:	5.9%
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Total Population (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	35,681	37,154	37,831	35,890	37,043
Population Variance	-1,039	434	1,111	-830	323
	-2.8%	1.2%	3.0%	-2.3%	0.9%
Hispanic/Latino	10.4%	17.1%	10.5%	9.7%	9.2%
White	75.4%	72.2%	63.2%	75.5%	50.6%
Black/ African American	0.7%	0.5%	0.7%	0.5%	1.2%
American Indian/ Alaska Native	0.1%	0.2%	0.1%	0.2%	0.1%
Asian	6.8%	3.6%	19.0%	8.2%	32.3%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.4%	0.7%	0.7%	0.7%	0.6%
Two or More Races	6.1%	5.6%	5.8%	5.2%	6.0%

Population 18 and Over (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	27,340	30,336	29,902	28,631	26,887
Hispanic/Latino	9.1%	15.7%	9.4%	9.0%	8.4%
White	77.7%	74.3%	66.9%	77.6%	54.1%
Black/ African American	0.8%	0.5%	0.7%	0.5%	1.1%
American Indian/ Alaska Native	0.1%	0.2%	0.1%	0.2%	0.1%
Asian	7.4%	3.9%	17.9%	8.1%	31.5%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.0%	0.1%	0.1%
Other	0.5%	0.7%	0.6%	0.6%	0.5%
Two or More Races	4.4%	4.5%	4.3%	3.9%	4.2%

Citizens by Voting Age Population Estimate (2015-2019)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	26,277	27,402	26,931	26,500	19,633
Hispanic/Latino	6.8%	12.0%	8.7%	8.8%	7.5%
White	84.1%	81.6%	74.7%	83.1%	62.8%
Black/ African American	0.8%	0.8%	1.5%	0.8%	0.4%
American Indian/ Alaska Native	0.3%	0.2%	0.1%	0.0%	0.9%
Asian	6.2%	3.6%	12.2%	5.6%	26.3%
Native Hawaiian/ Other Pacific Islander	0.3%	0.1%	0.0%	0.0%	0.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	1.6%	1.7%	2.7%	1.7%	2.0%

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE**

Exhibit 3

2020 Census and Redistricting



Jonathan Salt, F3 Law
January 11, 2022

What is the California Voting Rights Act (“CVRA”)?

- Took effect January 1, 2003
- Prohibits the use of “at-large” elections when such an election system:

“impairs the ability of a protected class to elect candidates of its choice or its ability to influence the outcome of an election....”

(Elections Code §14027.)



What is a “By-Trustee Area” Election System?

- *Only safe harbor from a CVRA claim*
- School district is divided into trustee areas
- A governing board member is elected from each trustee area
- Board members are elected **by only the registered voters in the particular trustee area** where the governing board member resides



Map Creation Considerations

■ Federal Requirements

- *Equal Population*
 - As equal as practical based on data and criteria from most recent Census Total Population
 - Within 10% variance between largest/smallest area
- *Minority Voting Rights*
 - No Discriminatory Purpose; No Vote Dilution
- *Equal Protection*
 - Race must not be a predominant factor

■ State Requirements

- Topography
- Geography
- Cohesiveness, Contiguity, Integrity, & Compactness of territory
- Community of Interest



Election Transition History

- On September 27, 2017, Board of Education passed Resolution to do the following:
 - Initiate transition to by-trustee area election system
 - Stating intent of Board to file a General Waiver Request from CDE/SBE from the “election requirement”
- Pre-Map Public Hearings:
 - October 12, 2017
 - October 19, 2017
- Map Public Hearings and Community Meetings:
 - November 16, 2017
 - November 28, 2017
 - December 14, 2017
 - November 13, 2017
 - November 14, 2017

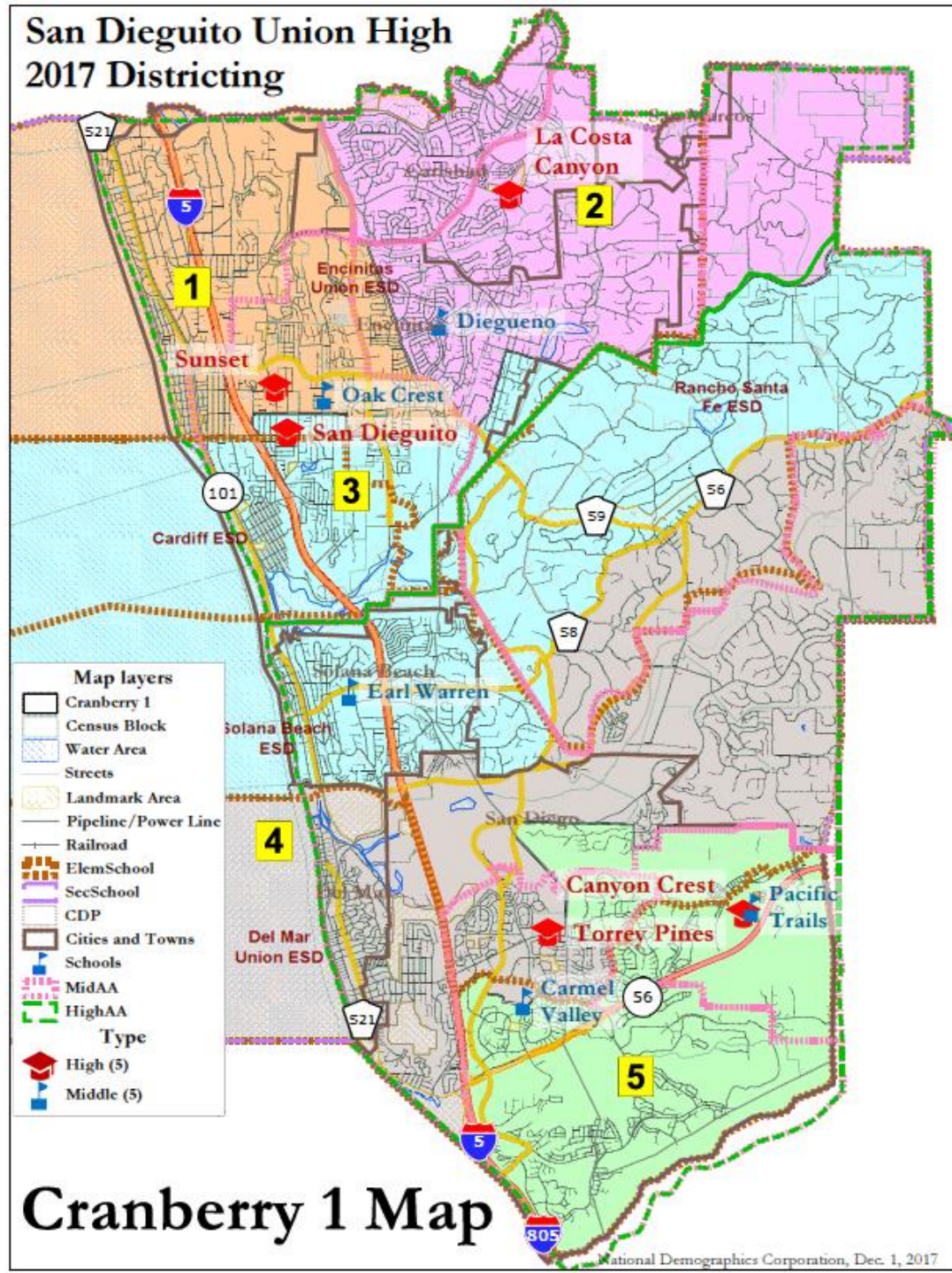


Election Transition History

- December 14, 2017:
 - Board approval of current Map
- Spring 2018:
 - County Committee on School District Organization approves District's transition
- November 2018:
 - District use of current Map in Governing Board elections



Current Trustee Area Map



Impact of Census

- Once transition made to by-trustee area election system, then following each federal census:
 - Governing board must approve adjustment of trustee area boundaries to make sure each the population in each trustee area is as nearly as equal as practical, among other things.
 - By 3/1/22



(Education Code section 5019.5(a).)



► DISTRICT DEMOGRAPHICS
2020 CENSUS DATA

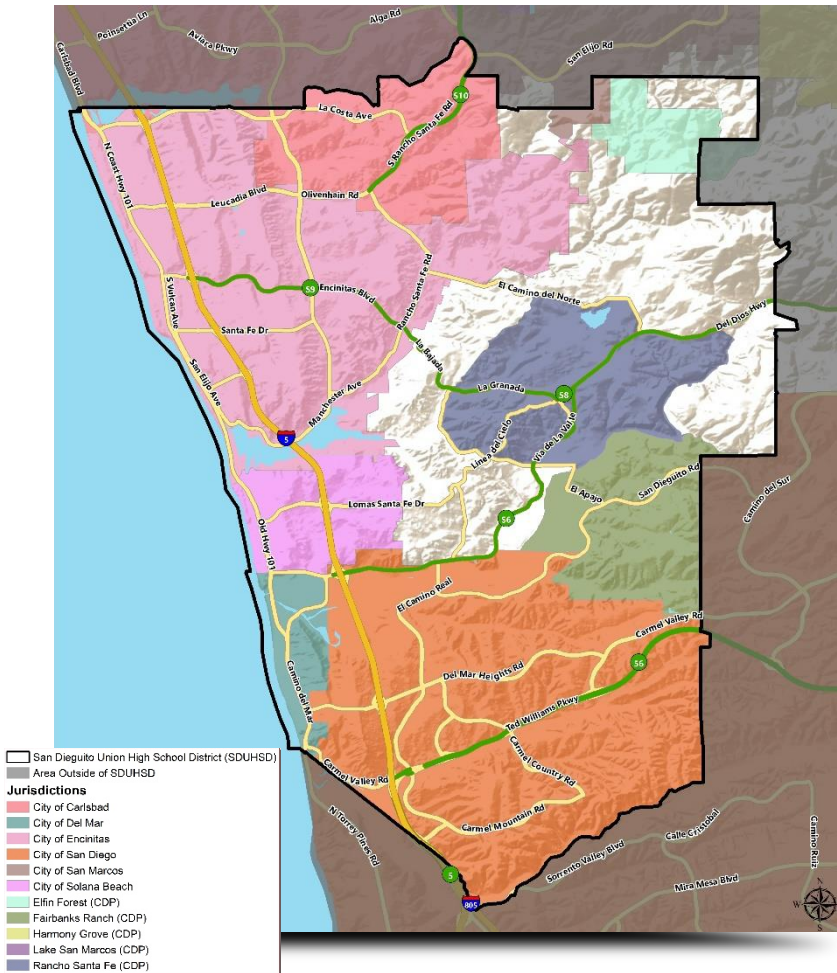


- Validated redistricting data was finalized by the California Department of Finance on September 27, 2021.
- This data showed substantial changes in the area served by San Dieguito Union High School District (“SDUHSD”) from 2010 to 2020, including:
 - Overall population growth of 17,530 (10.6%)
 - Total Variance of 27.9% based on 2020 Census (*Out of Compliance*)

Trustee Area	2010 Census		2020 Census		Change	
	Total	Variance	Total	Variance	Population	Percent
Trustee Area 1	32,920	-0.9%	34,548	-5.9%	1,628	4.9%
Trustee Area 2	33,240	0.1%	35,773	-2.6%	2,533	7.6%
Trustee Area 3	33,193	-0.1%	34,321	-6.5%	1,128	3.4%
Trustee Area 4	33,386	0.5%	34,382	-6.4%	996	3.0%
Trustee Area 5	33,330	0.3%	44,575	21.4%	11,245	33.7%
Total Population	166,069	1.4%	183,599	27.9%	17,530	10.6%

► DISTRICT DEMOGRAPHICS

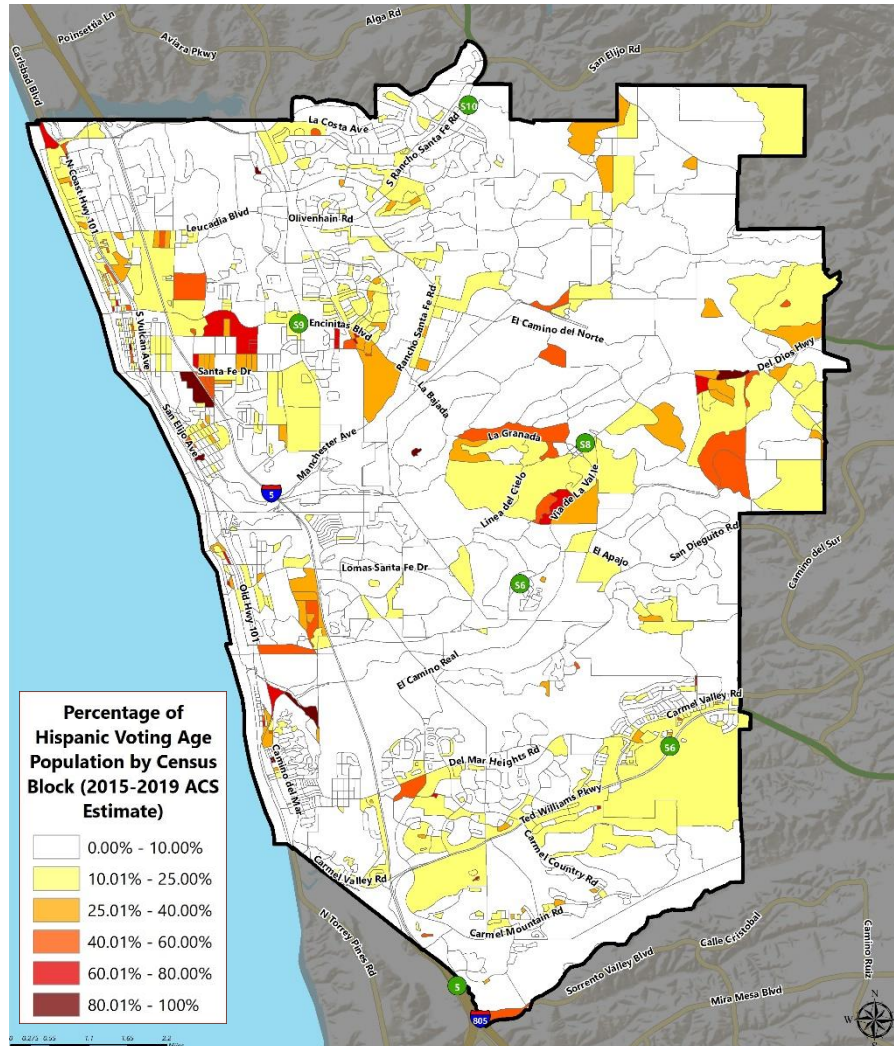
2020 CENSUS DATA



Population	Total Population		Age 18 and over	
	Total	%	Total	%
Hispanic/Latino	20,937	11.4%	14,904	10.4%
White	123,436	67.2%	100,533	70.3%
Black / African American	1,323	0.7%	1,034	0.7%
American Indian /Alaska Native	255	0.1%	206	0.1%
Asian	25,811	14.1%	19,360	13.5%
Native Hawaiian/ Pacific Islander	180	0.1%	138	0.1%
Other	1,120	0.6%	816	0.6%
Two or More Races	10,537	5.7%	6,105	4.3%
Total	183,599	100%	143,096	100%

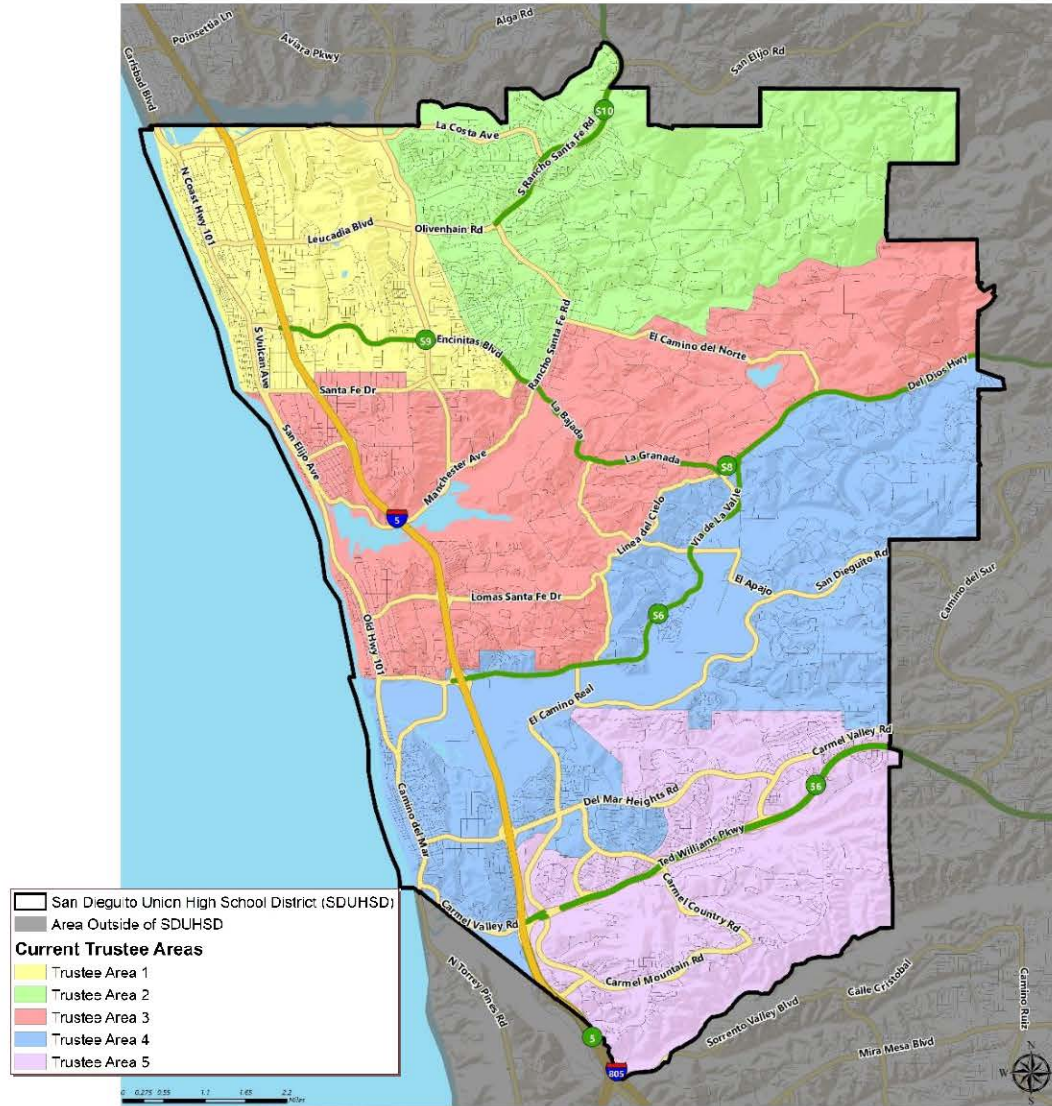
► DISTRICT DEMOGRAPHICS

CITIZEN VOTING AGE POPULATION ESTIMATES



Population	2015-2019 CVAP	
	Total	%
Hispanic/Latino	11,220	8.8%
White	99,029	78.1%
Black / African American	1,144	0.9%
American Indian / Alaska Native	331	0.3%
Asian	12,551	9.9%
Native Hawaiian/ Pacific Islander	113	0.1%
Two or More Races	2,442	1.9%
Total	126,830	100%

▶ CURRENT TRUSTEE AREAS



► CURRENT TRUSTEE AREAS

	Census 2020 Total Population:		183,599		Ideal Trustee Area Size:		36,720		Total Variance:		27.9%	
TRUSTEE AREA	Trustee Area 1		Trustee Area 2		Trustee Area 3		Trustee Area 4		Trustee Area 5			
TP* vs. CVAP**	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP		
Population	34,549	26,779	35,773	25,739	34,320	26,421	34,380	22,869	44,577	25,022		
Population Variance	-5.9%	N/A	-2.6%	N/A	-6.5%	N/A	-6.4%	N/A	21.4%	N/A		
Hispanic/Latino	15.8%	10.9%	10.7%	8.3%	13.9%	9.7%	8.2%	6.9%	9.1%	8.1%		
White	72.9%	82.0%	75.2%	83.1%	75.7%	84.0%	68.1%	78.4%	49.3%	62.3%		
Black/African American	0.5%	0.6%	0.7%	0.8%	0.5%	1.0%	0.7%	1.6%	1.1%	0.7%		
American Indian/Alaska Native	0.2%	0.2%	0.1%	0.3%	0.2%	0.1%	0.1%	0.0%	0.1%	0.7%		
Asian	4.3%	4.7%	6.3%	5.4%	4.1%	3.9%	16.7%	10.6%	33.4%	25.9%		
Native Hawaiian/Other Pacific Islander	0.1%	0.1%	0.1%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%		
Other	0.6%	N/A	0.6%	N/A	0.7%	N/A	0.8%	N/A	0.5%	N/A		
Two or More Races	5.6%	1.5%	6.3%	1.9%	4.8%	1.4%	5.4%	2.6%	6.4%	2.4%		

*Total Population; Source: Redistricting Database for California, Published by Statewide Database on September 20, 2021

**Citizen Voting Age Population (CVAP); Source: American Community Survey, 2015-2019 Data

***May not sum exactly due to rounding.



QUESTIONS

A row of yellow school buses is parked in a grassy field. The buses are yellow with black stripes and have "SCHOOL BUS" written on the front. The background is a blue sky with white clouds. The entire image is overlaid with a large, semi-transparent, stylized letter 'S'.

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE**

Exhibit 4

2020年度审查和分区地图重划报告

2020 Census and Redistricting

Censo y Redistribución de Distritos de 2020



Milton Foster, F3 Law
January 27, 2022

“By-Trustee Area” Election System

Sistema de Elección de “Área de Síndico”

“董事所在属地”的选举制度

- *Only safe harbor from a CVRA claim/ Solo puerto seguro de un reclamo CVRA (proporciona defensa jurídica automática).*
- School district is divided into trustee areas/El distrito escolar está dividido en áreas de acuerdo a miembros de la junta directiva (cada miembro de la junta tiene que residir dentro de la area respectiva)
- A governing board member is elected from each trustee area/Se elige un miembro de la junta de directiva de cada área de fideicomisarios
- District transitioned in 2017/Distrito hizo la transición en 2017

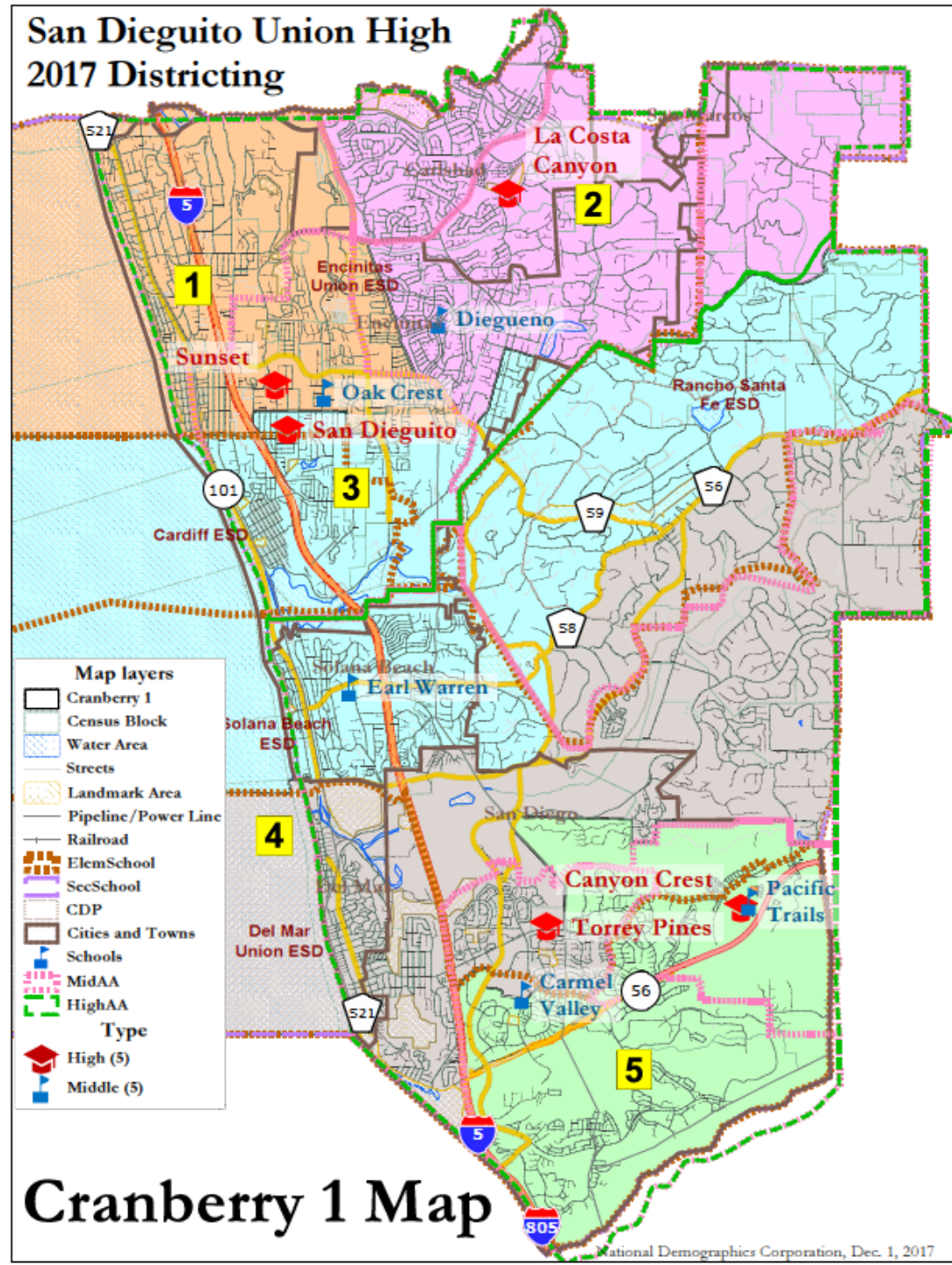
简报概要: 学区依据董事所在地划分;
管理委员会的委员由每个董事所在区域中推选出来
学区在2017年进入重划过渡期



Current Trustee Area Map

Mapa actual del área de los Miembros de la Junta Directiva

2017年的董事所在区域地图



Impact of Census/ Impacto del Censo

审查后的影响

- Once transition made to by-trustee area election system, then following each federal census:
 - Assessment of trustee area map along with Census data must be conducted to determine compliance. Q: is the population balanced?
 - Governing board must approve adjustment of trustee area boundaries to make sure each the population in each trustee area is as nearly as equal as practical, among other things.
 - By 3/1/22
- (Education Code section 5019.5(a).)
- Una vez realizada la transición al sistema de elección por área de miembro de junta directiva, luego de cada censo federal:
 - Se debe realizar una evaluación del mapa del área del administrador junto con los datos del censo para determinar el cumplimiento. P: ¿La población está equilibrada?
 - La junta directiva debe aprobar el ajuste de los límites del área de fideicomisarios para asegurarse de que cada población en cada área de fideicomisarios sea lo más equitativa posible, entre otras cosas.
- Para el 3/1/22
- (Sección del Código de Educación 5019.5(a).)

简报概要: 依据教育法第5019.5(a)条例, 选区地图的重划改革进程必须考量每个区域的人口是否平衡, 管理委员会也必须监督此点, 尽量做到各区间间的平衡。





► DISTRICT DEMOGRAPHICS/DEMOGRAFÍA DEL DISTRITO

2020 CENSUS DATA/ DATOS DEL CENSO 2020

2020年度审计资料显示的人口统计数据表

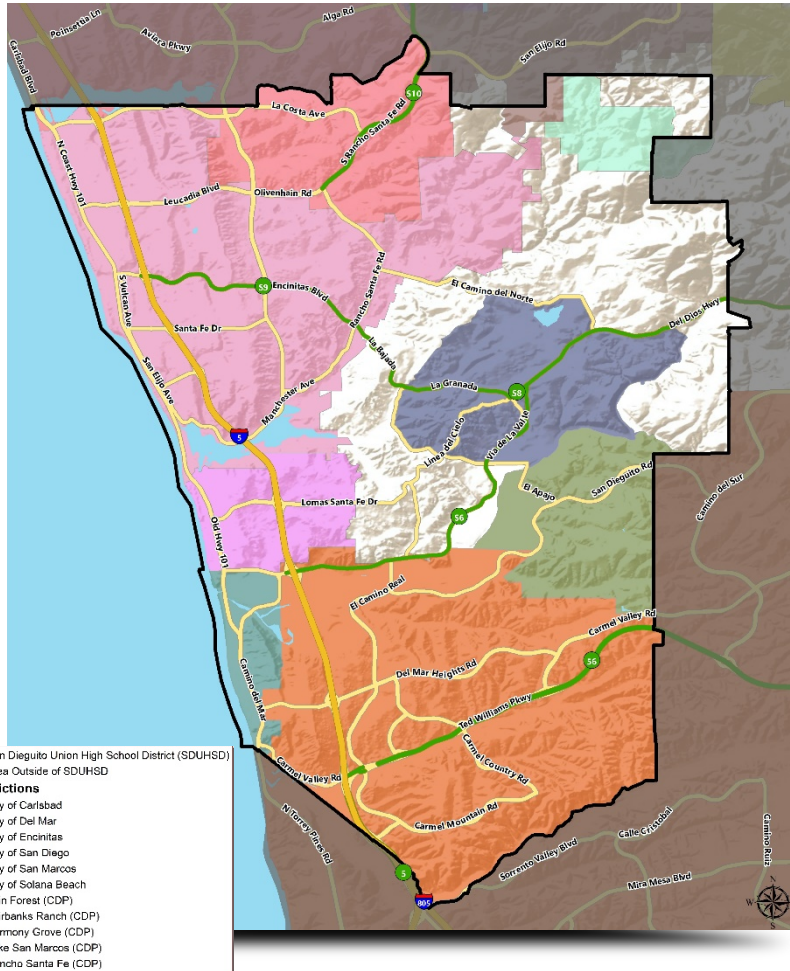
- Validated redistricting data was finalized by the California Department of Finance on September 27, 2021.
- This data showed substantial changes in the area served by San Dieguito Union High School District ("SDUHSD") from 2010 to 2020, including:
 - Overall population growth of 17,530 (10.6%)
 - Total Variance of 27.9% based on 2020 Census (*Out of Compliance*)
- Los datos de redistribución de distritos validados fueron finalizados por el Departamento de Finanzas de California el 27 de septiembre de 2021. This data showed substantial changes in the area served by San Dieguito Union High School District ("SDUHSD") from 2010 to 2020, including:
 - Crecimiento general de la población de 17,530 (10.6%). Variación total del 27.9 % según el censo de 2020 (fuera de cumplimiento)
 - Variación total del 27.9 % según el censo de 2020 (fuera de cumplimiento)

Trustee Area/ Área de Miembro de Junta Directiva	2010 Census/ Censo del 2010		2020 Census		Change	
	Total	Variance	Total	Variance	Population	Percent
Trustee Area 1	32,920	-0.9%	34,548	-5.9%	1,628	4.9%
Trustee Area 2	33,240	0.1%	35,773	-2.6%	2,533	7.6%
Trustee Area 3	33,193	-0.1%	34,321	-6.5%	1,128	3.4%
Trustee Area 4	33,386	0.5%	34,382	-6.4%	996	3.0%
Trustee Area 5	33,330	0.3%	44,575	21.4%	11,245	33.7%
Total Population	166,069	1.4%	183,599	27.9%	17,530	10.6%

► DISTRICT DEMOGRAPHICS/DEMOGRAFÍA DEL DISTRITO

2020 CENSUS DATA/ DATOS DEL CENSO 2020

2020年度审计资料显示的各族群人口统计数据表



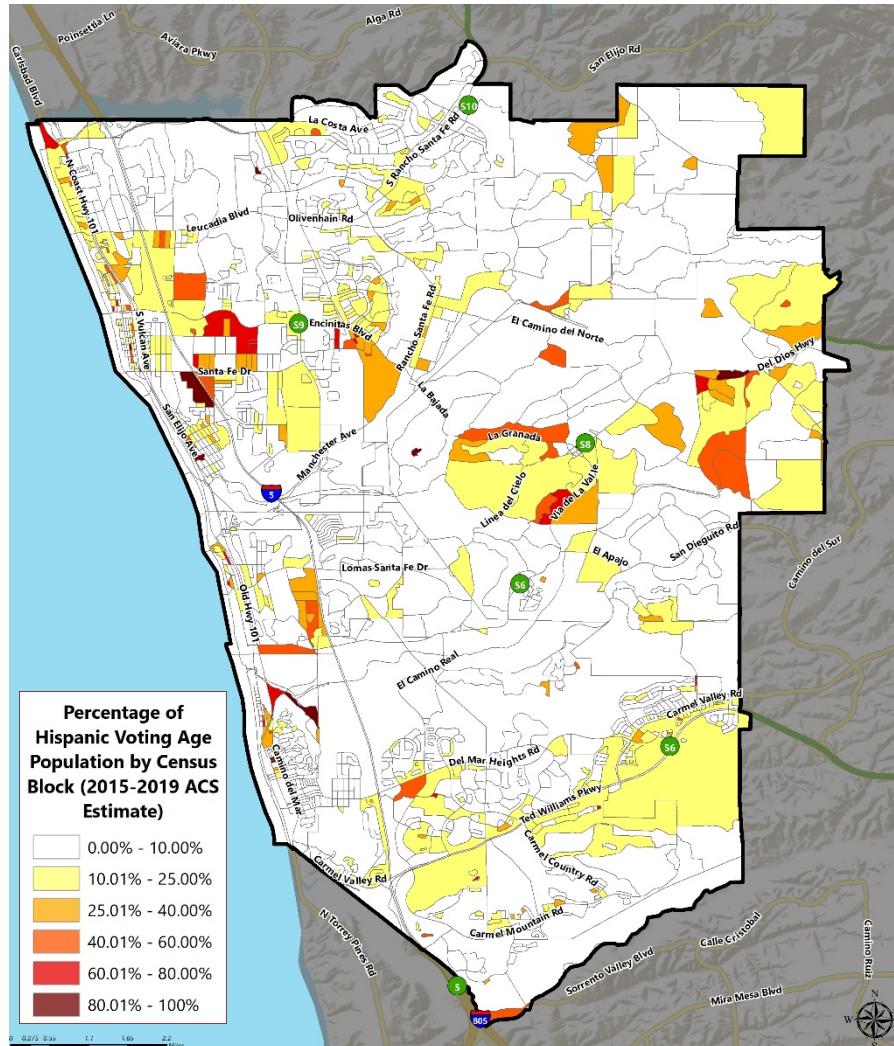
Population	Total Population		Age 18 and over	
	Total	%	Total	%
Hispanic/Latino	20,937	11.4%	14,904	10.4%
White	123,436	67.2%	100,533	70.3%
Black / African American	1,323	0.7%	1,034	0.7%
American Indian /Alaska Native	255	0.1%	206	0.1%
Asian 亚裔人口	25,811	14.1%	19,360	13.5%
Native Hawaiian/ Pacific Islander	180	0.1%	138	0.1%
Other	1,120	0.6%	816	0.6%
Two or More Races	10,537	5.7%	6,105	4.3%
Total	183,599	100%	143,096	100%

► DISTRICT DEMOGRAPHICS/DEMOGRAFÍA DEL DISTRITO

CITIZEN VOTING AGE POPULATION ESTIMATES – Hispanic/Latino

ESTIMACIONES DE POBLACIÓN DE CIUDADANO CON EDAD DE VOTACIÓN - Hispano / Latino

粗估西班牙裔达到法定投票年龄的人口统计

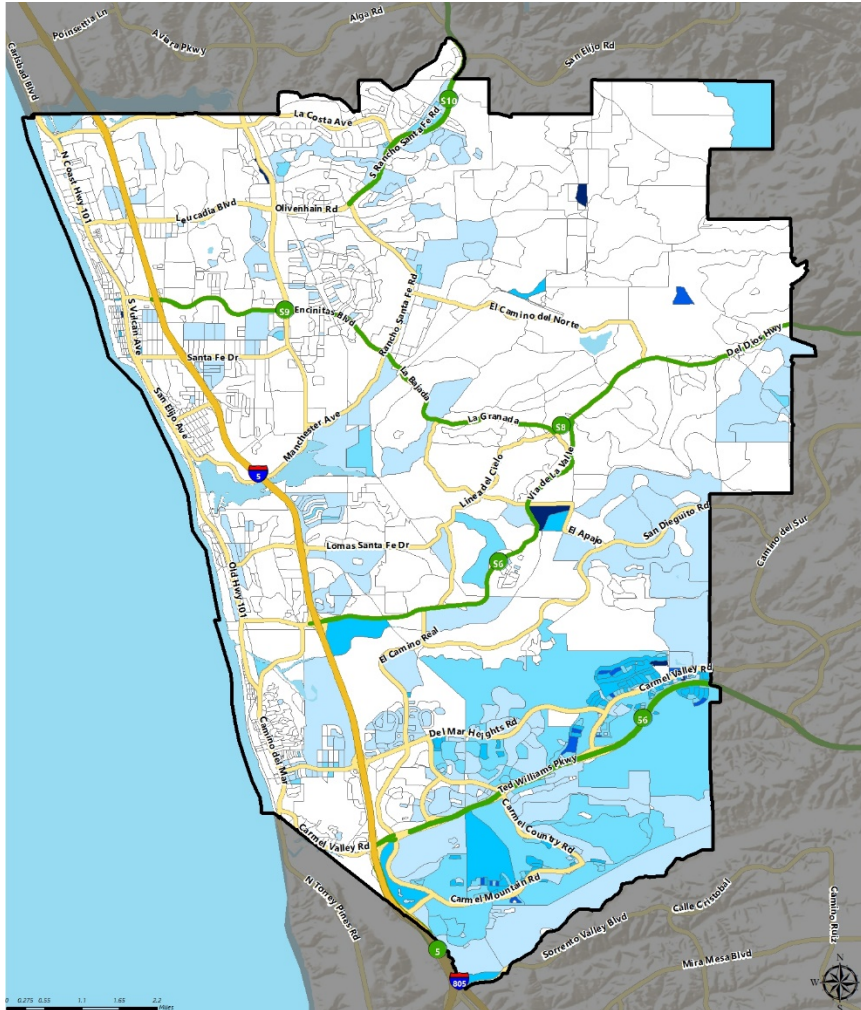


San Dieguito Union High School

Population	2015-2019 CVAP	
	Total	%
Hispanic/Latino	11,220	8.8%
White/ Blanco	99,029	78.1%
Black / African American/afroamericano	1,144	0.9%
American Indian / Alaska Native Indio americano/ nativo de Alaska	331	0.3%
Asian/asiático	12,551	9.9%
Native Hawaiian/ Pacific Islander/Nativo de Hawái/Isleño del Pacífico	113	0.1%
Two or More Races/Dos o mas razas	2,442	1.9%
Total	126,830	100%

► DISTRICT DEMOGRAPHICS/DEMOGRAFÍA DEL DISTRITO

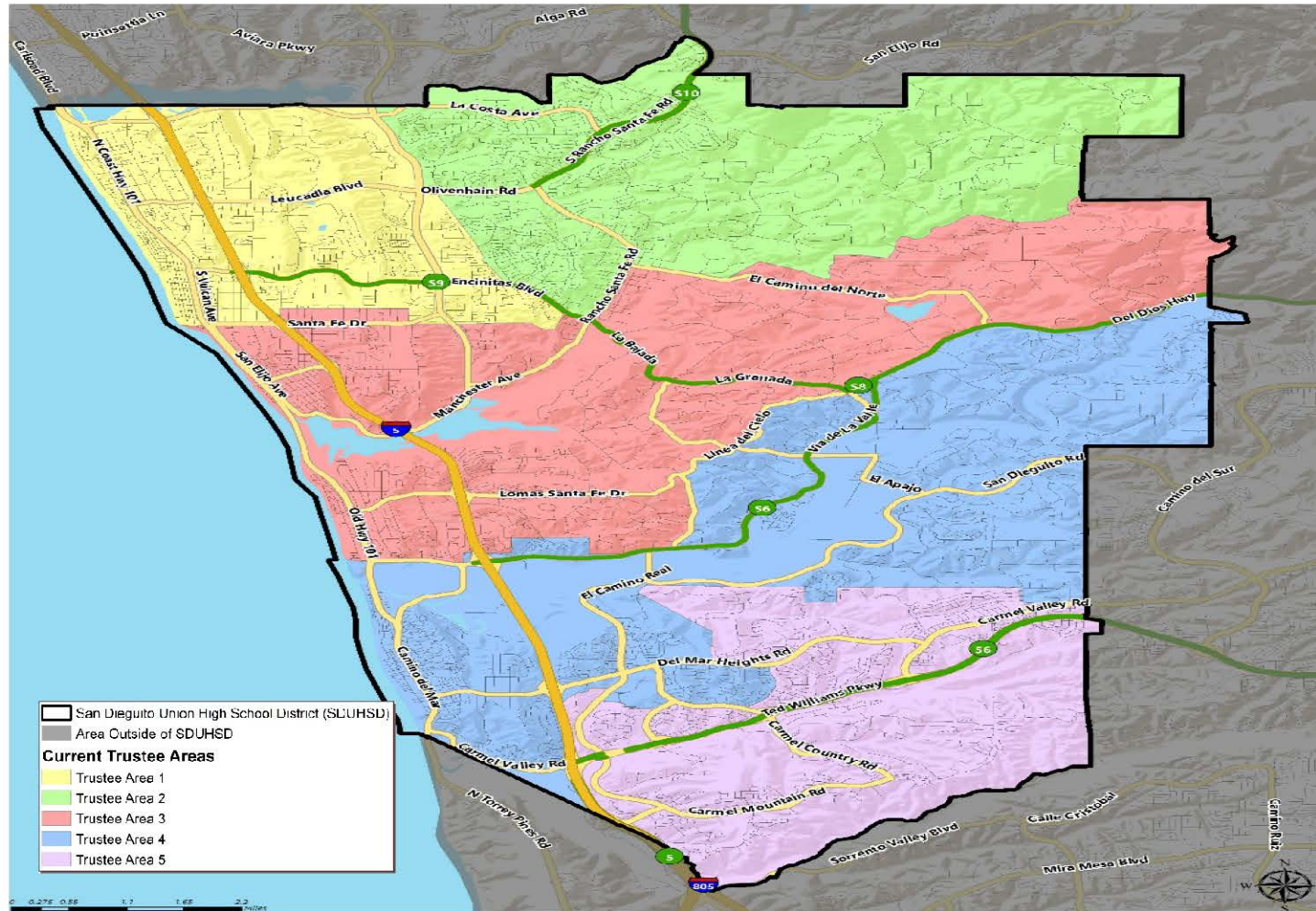
CITIZEN VOTING AGE POPULATION ESTIMATES – ASIAN ESTIMACIONES DE POBLACIÓN DE CIUDADANO CON EDAD DE VOTACIÓN - ASIÁTICA 粗估亚裔达到法定投票年龄的人口统计



Population	2015-2019 CVAP	
	Total	%
Hispanic/Latino	11,220	8.8%
White/ Blanco	99,029	78.1%
Black / African American/afroamericano	1,144	0.9%
American Indian / Alaska Native Indio americano/ nativo de Alaska	331	0.3%
Asian/asiático 亚裔	12,551	9.9%
Native Hawaiian/ Pacific Islander/Nativo de Hawái/Isleño del Pacífico	113	0.1%
Two or More Races/Dos o mas razas	2,442	1.9%
Total	126,830	100%

▶ CURRENT TRUSTEE AREAS/ÁREAS ACTUALES DE MIEMBROS DE LA JUNTA DIRECTIVA

目前的董事所在区域地图



▶ CURRENT TRUSTEE/ ÁREAS ACTUALES DE MIEMBROS DE LA JUNTA DIRECTIVA 目前的董事所在区域内各族群的人口统计表

Census 2020 Total Population:	183,599		Ideal Trustee Area Size:	36,720		Total Variance:	27.9%			
TRUSTEE AREA	Trustee Area 1		Trustee Area 2		Trustee Area 3		Trustee Area 4		Trustee Area 5	
TP* vs. CVAP**	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP
Population/ Población	34,549	26,779	35,773	25,739	34,320	26,421	34,380	22,869	44,577	25,022
Population Variance/Variación De La Población	-5.9%	N/A	-2.6%	N/A	-6.5%	N/A	-6.4%	N/A	21.4%	N/A
Hispanic/Latino	15.8%	10.9%	10.7%	8.3%	13.9%	9.7%	8.2%	6.9%	9.1%	8.1%
White	72.9%	82.0%	75.2%	83.1%	75.7%	84.0%	68.1%	78.4%	49.3%	62.3%
Black/African American	0.5%	0.6%	0.7%	0.8%	0.5%	1.0%	0.7%	1.6%	1.1%	0.7%
American Indian/Alaska Native	0.2%	0.2%	0.1%	0.3%	0.2%	0.1%	0.1%	0.0%	0.1%	0.7%
Asian 亚裔	4.3%	4.7%	6.3%	5.4%	4.1%	3.9%	16.7%	10.6%	33.4%	25.9%
Native Hawaiian/Other Pacific Islander	0.1%	0.1%	0.1%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%
Other	0.6%	N/A	0.6%	N/A	0.7%	N/A	0.8%	N/A	0.5%	N/A
Two or More Races	5.6%	1.5%	6.3%	1.9%	4.8%	1.4%	5.4%	2.6%	6.4%	2.4%

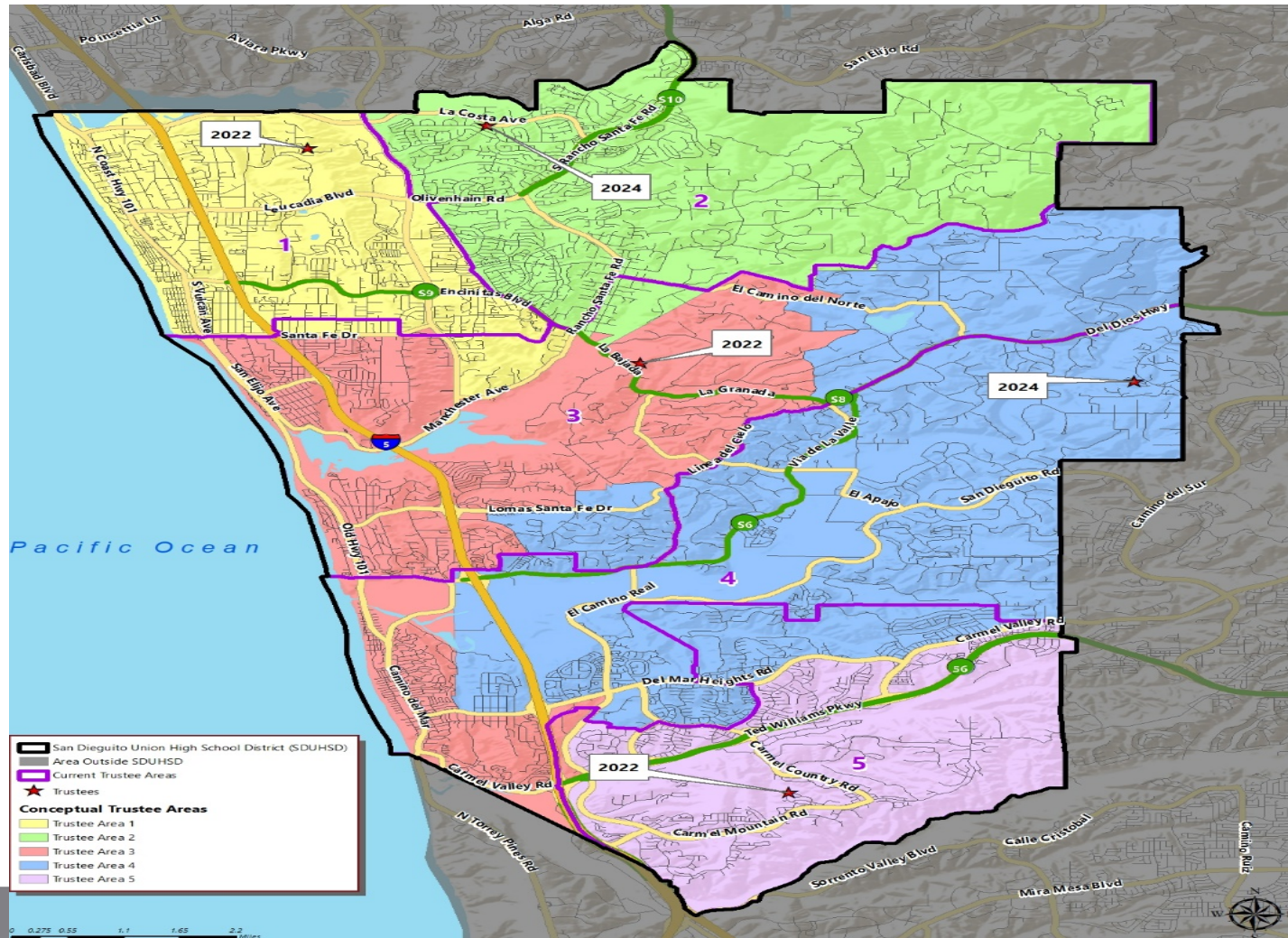
*Total Population; Source: Redistricting Database for California, Published by Statewide Database on September 20, 2021

**Citizen Voting Age Population (CVAP); Source: American Community Survey, 2015-2019 Data

***May not sum exactly due to rounding.

► CONCEPTUAL TRUSTEE AREAS/ÁREAS CONCEPTUALES DE MIEMBROS DE LA JUNTA DIRECTIVA 董事区域重划概念图一

SCENARIO 1 | ESCENARIO 1 版本一



► **DEMOGRAPHICS/DEMOGRAFÍA** 人口统计专家提出的重划各区各族群人口统计表
SCENARIO 1 | ESCENARIO 1 版本一

Total Population:	183,599	Ideal Trustee Area Size:	36,720	Total Variance:	3.7%
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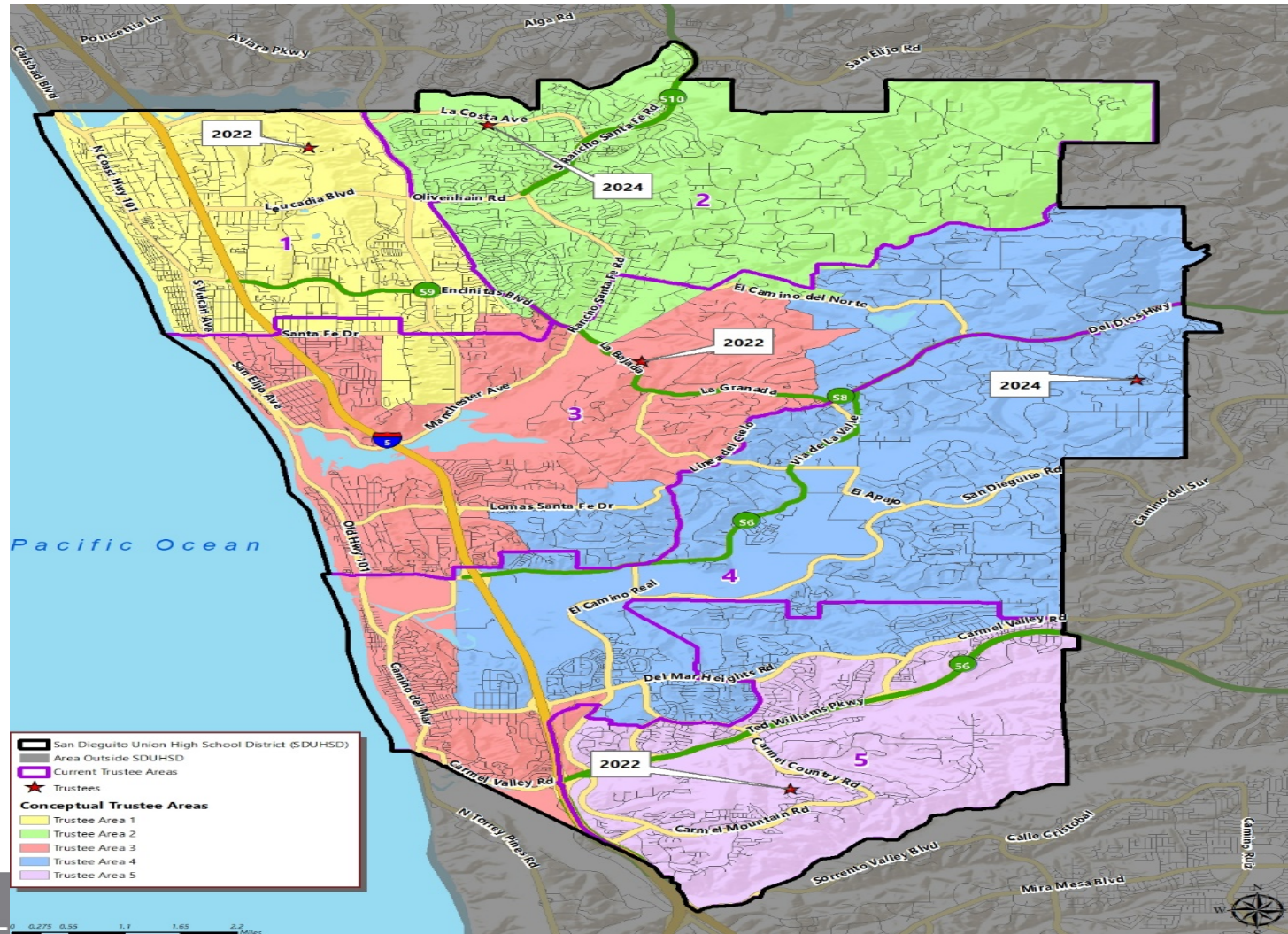
TRUSTEE AREA	Trustee Area 1		Trustee Area 2		Trustee Area 3		Trustee Area 4		Trustee Area 5	
TP* vs. CVAP**	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP
Population/ Población	37,595	29,091	36,433	26,221	36,220	28,751	36,772	21,369	36,579	21,311
Population Variance/Variación De La Población	2.4%	N/A	-0.8%	N/A	-1.4%	N/A	0.1%	N/A	-0.4%	N/A
Hispanic/Latino	16.7%	11.3%	10.7%	8.3%	12.0%	8.8%	7.9%	6.5%	9.6%	8.4%
White	72.3%	81.7%	75.3%	83.1%	76.4%	84.0%	61.4%	74.2%	50.7%	62.9%
Black/African American	0.5%	0.8%	0.7%	0.8%	0.5%	1.1%	0.7%	1.2%	1.1%	0.6%
American Indian/Alaska Native	0.2%	0.2%	0.1%	0.3%	0.2%	0.1%	0.1%	0.0%	0.1%	0.9%
Asian	4.2%	4.4%	6.2%	5.4%	4.8%	3.9%	24.0%	16.0%	31.2%	24.9%
Native Hawaiian/Other Pacific Islander	0.1%	0.1%	0.1%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%
Other	0.6%	0.0%	0.6%	0.0%	0.7%	0.0%	0.7%	0.0%	0.5%	0.0%
Two or More Races	5.4%	1.4%	6.3%	1.8%	5.2%	2.1%	5.1%	2.2%	6.6%	2.3%

*Total Population; Source: Redistricting Database for California, Published by Statewide Database on September 20, 2021

**Citizen Voting Age Population (CVAP); Source: American Community Survey, 2015-2019 Data

► CONCEPTUAL TRUSTEE AREAS/ÁREAS CONCEPTUALES DE MIEMBROS DE LA JUNTA DIRECTIVA 董事区域重划概念图二

SCENARIO 2 版本二



CONCEPTUAL TRUSTEE AREAS/ÁREAS CONCEPTUALES
 ▶ DEL MIEMBRO DE LA JUNTA DIRECTIVA 重划概念二: 各区各族群人口统计表
SCENARIO 2/ESCENARIO 2 版本二

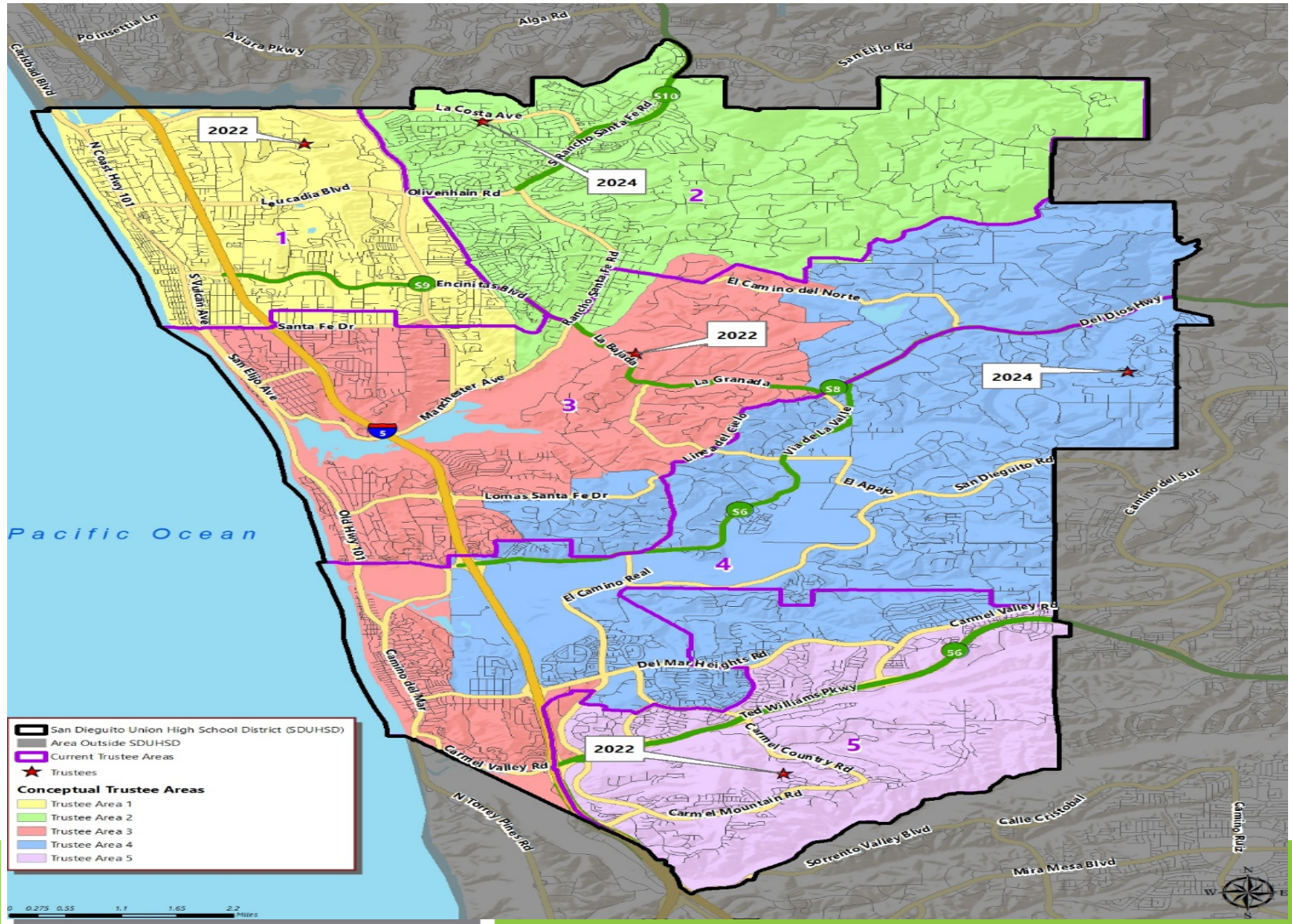
Total Population:	183,599	Ideal Trustee Area Size:	36,720	Total Variance:	3.4%
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TRUSTEE AREA	Trustee Area 1		Trustee Area 2		Trustee Area 3		Trustee Area 4		Trustee Area 5	
TP* vs. CVAP**	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP
Population/ Población	37,356	29,124	36,802	26,583	36,090	28,356	36,772	21,369	36,579	21,311
Population Variance/Variación De La Población	1.7%	N/A	0.2%	N/A	-1.7%	N/A	0.1%	N/A	-0.4%	N/A
Hispanic/Latino	16.8%	11.2%	10.7%	8.8%	11.9%	8.6%	7.9%	6.5%	9.6%	8.4%
White	72.0%	81.5%	75.3%	82.7%	76.7%	84.5%	61.4%	74.2%	50.7%	62.9%
Black/African American	0.5%	1.0%	0.7%	0.8%	0.5%	0.9%	0.7%	1.2%	1.1%	0.6%
American Indian/Alaska Native	0.2%	0.2%	0.1%	0.3%	0.1%	0.1%	0.1%	0.0%	0.1%	0.9%
Asian	4.3%	4.5%	6.2%	5.3%	4.7%	3.9%	24.0%	16.0%	31.2%	24.9%
Native Hawaiian/Other Pacific Islander	0.1%	0.1%	0.1%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%
Other	0.6%	0.0%	0.6%	0.0%	0.7%	0.0%	0.7%	0.0%	0.5%	0.0%
Two or More Races	5.5%	1.5%	6.3%	1.8%	5.2%	2.1%	5.1%	2.2%	6.6%	2.3%

*Total Population; Source: Redistricting Database for California, Published by Statewide Database on September 20, 2021

**Citizen Voting Age Population (CVAP); Source: American Community Survey, 2015-2019 Data

CONCEPTUAL TRUSTEE AREAS/ÁREAS CONCEPTUALES
 DEL MIEMBRO DE LA JUNTA DIRECTIVA 董事区域重划概念图三
SCENARIO 3/ESCENARIO 3



► DEMOGRAPHICS/DEMOGRAFÍA
SCENARIO 3/ESCENARIO 3 版本三

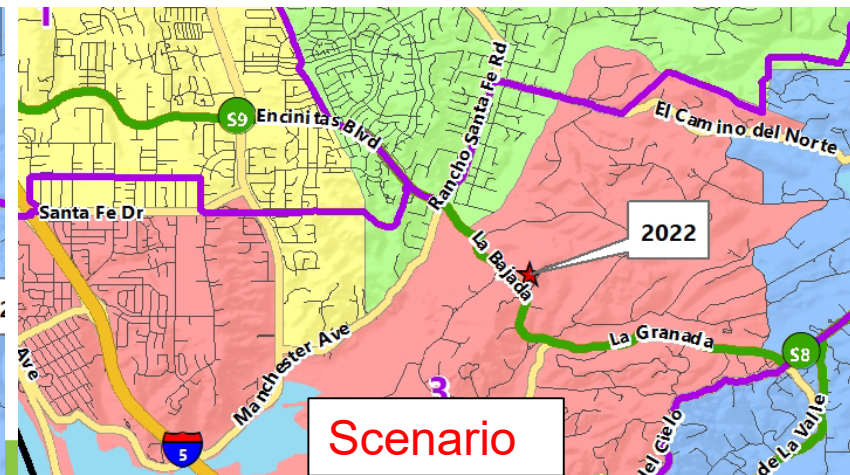
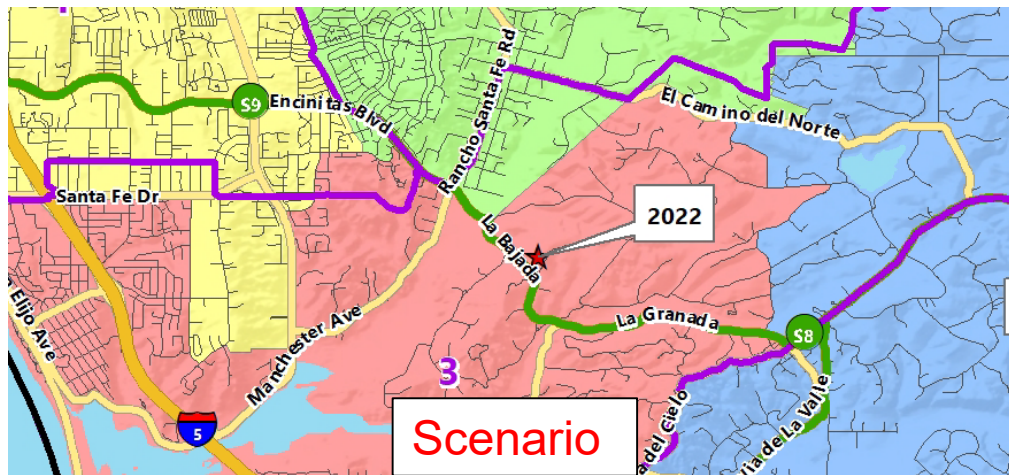
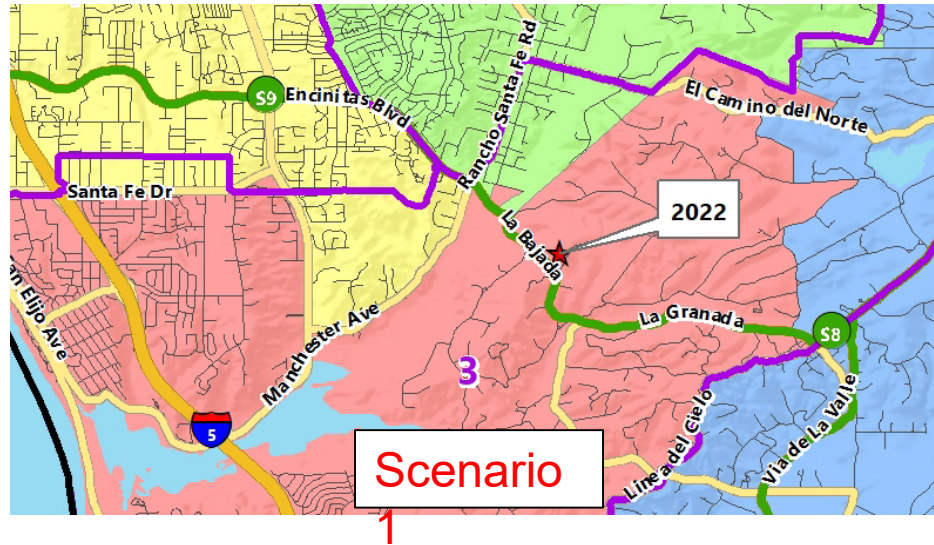
Total Population:	183,599	Ideal Trustee Area Size:	36,720	Total Variance:	0.8%
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TRUSTEE AREA	Trustee Area 1		Trustee Area 2		Trustee Area 3		Trustee Area 4		Trustee Area 5	
TP* vs. CVAP**	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP	TP	CVAP
Population/ Población	36,872	28,428	36,748	26,564	36,628	29,071	36,772	21,369	36,579	21,311
Population Variance/Variación De La Población	0.4%	N/A	0.1%	N/A	-0.3%	N/A	0.1%	N/A	-0.4%	N/A
Hispanic/Latino	16.8%	10.7%	10.7%	9.1%	12.0%	8.8%	7.9%	6.5%	9.6%	8.4%
White	72.1%	82.1%	75.3%	82.4%	76.5%	84.1%	61.4%	74.2%	50.7%	62.9%
Black/African American	0.5%	0.8%	0.7%	0.8%	0.5%	1.1%	0.7%	1.2%	1.1%	0.6%
American Indian/Alaska Native	0.2%	0.2%	0.1%	0.3%	0.2%	0.1%	0.1%	0.0%	0.1%	0.9%
Asian	4.2%	4.5%	6.2%	5.3%	4.8%	3.9%	24.0%	16.0%	31.2%	24.9%
Native Hawaiian/Other Pacific Islander	0.1%	0.1%	0.1%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%
Other	0.5%	0.0%	0.6%	0.0%	0.7%	0.0%	0.7%	0.0%	0.5%	0.0%
Two or More Races	5.5%	1.5%	6.3%	1.8%	5.2%	2.0%	5.1%	2.2%	6.6%	2.3%

*Total Population; Source: Redistricting Database for California, Published by Statewide Database on September 20, 2021

**Citizen Voting Age Population (CVAP); Source: American Community Survey, 2015-2019 Data

CONCEPTUAL TRUSTEE AREAS/ÁREAS CONCEPTUALES
 DEL MIEMBRO DE LA JUNTA DIRECTIVA 三个版本的董事区域重划概念比较图



▶ Next Steps/Próximos Pasos

下一步: 二〇二二年一月到二月间提出并修改选区地图的重划方案

在二〇二二年三月一日前决议出重划图的最终版本, 提交给县选民登记处

DATE/FECHA	ACTIVITY/ACTIVIDAD
January 20, 2022 20 De Enero Del 2022	Board Meeting: Presentation on Evaluation of Existing Voting Areas Review Initial Draft Adjusted Scenarios Reunión de la Junta: Presentación Sobre La Evaluación De Las Áreas De Votación Existentes Y Revisar El Borrador Inicial De Los Escenarios Ajustados
January – February 2022 Enero- Febrero 2022	Cooperative Strategies revises maps of adjusted Voting Areas if necessary. Cooperative Strategies revisa los mapas de las áreas de votación ajustadas si es necesario.
February 17, 2022 17 De Febrero Del 2022	Board Meeting: Review Adjusted Map Scenarios Board Adopts Final Trustee Area Map Reunión de la Junta: Revisar Escenarios De Mapas Ajustados La Junta Adopta El Mapa Final Del Área De Miembros De La Junta Directiva
By March 1, 2022 Para 1 de Marzo del 2022	Final Trustee Area Map to the County Registrars of Voters. Mapa final del área de miembros de la junta directiva para el condado de registradores de votantes.





QUESTIONS

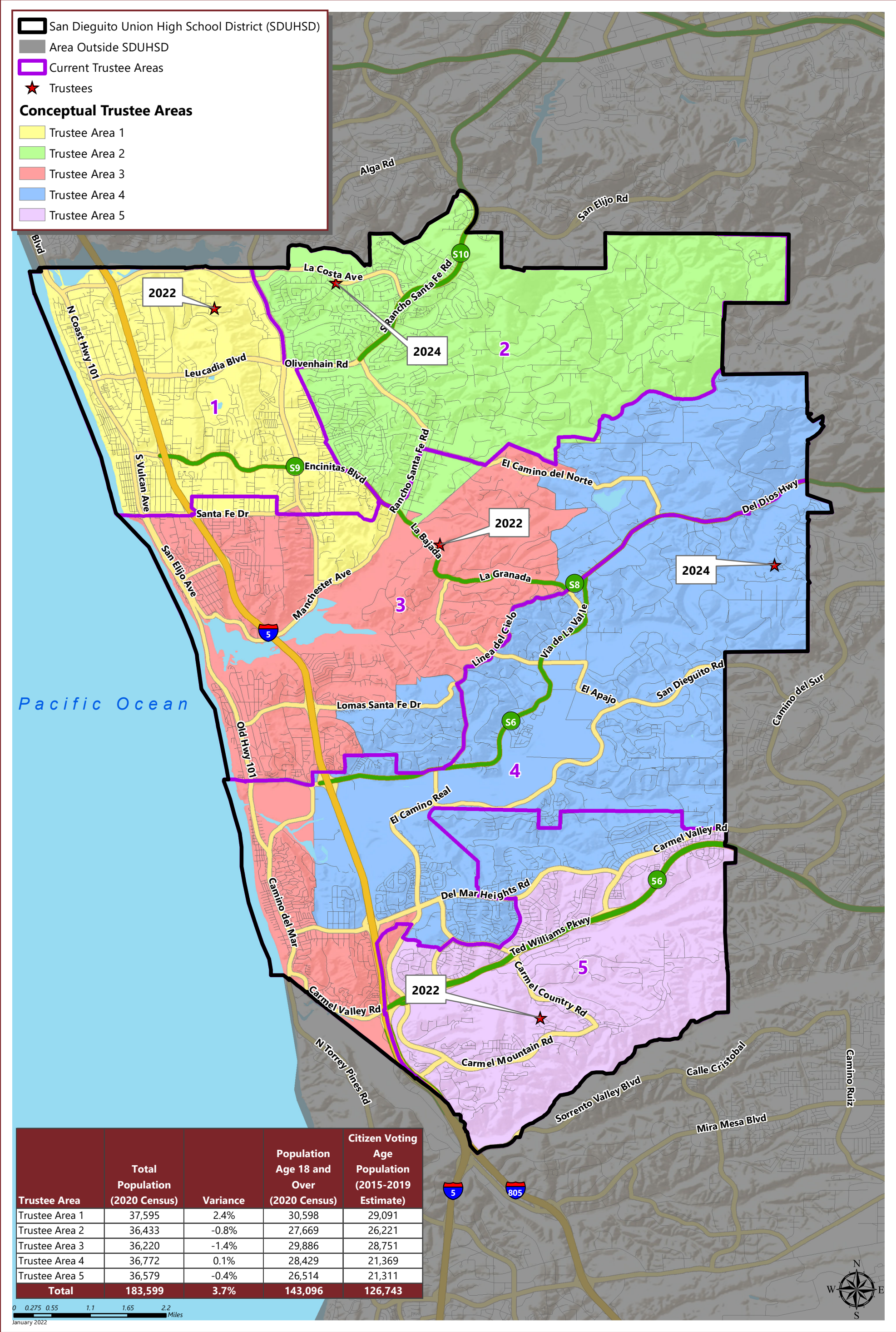
A row of yellow school buses is parked in a grassy field under a cloudy sky. The buses are slightly out of focus, and the overall image has a dark, moody tone. A large, stylized, semi-transparent letter 'S' graphic is overlaid on the image, serving as a background for the text.

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE**

Exhibit 5

SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 1



SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 1

Total Population:	183,599	Ideal Population:	36,720	Variance:	3.7%
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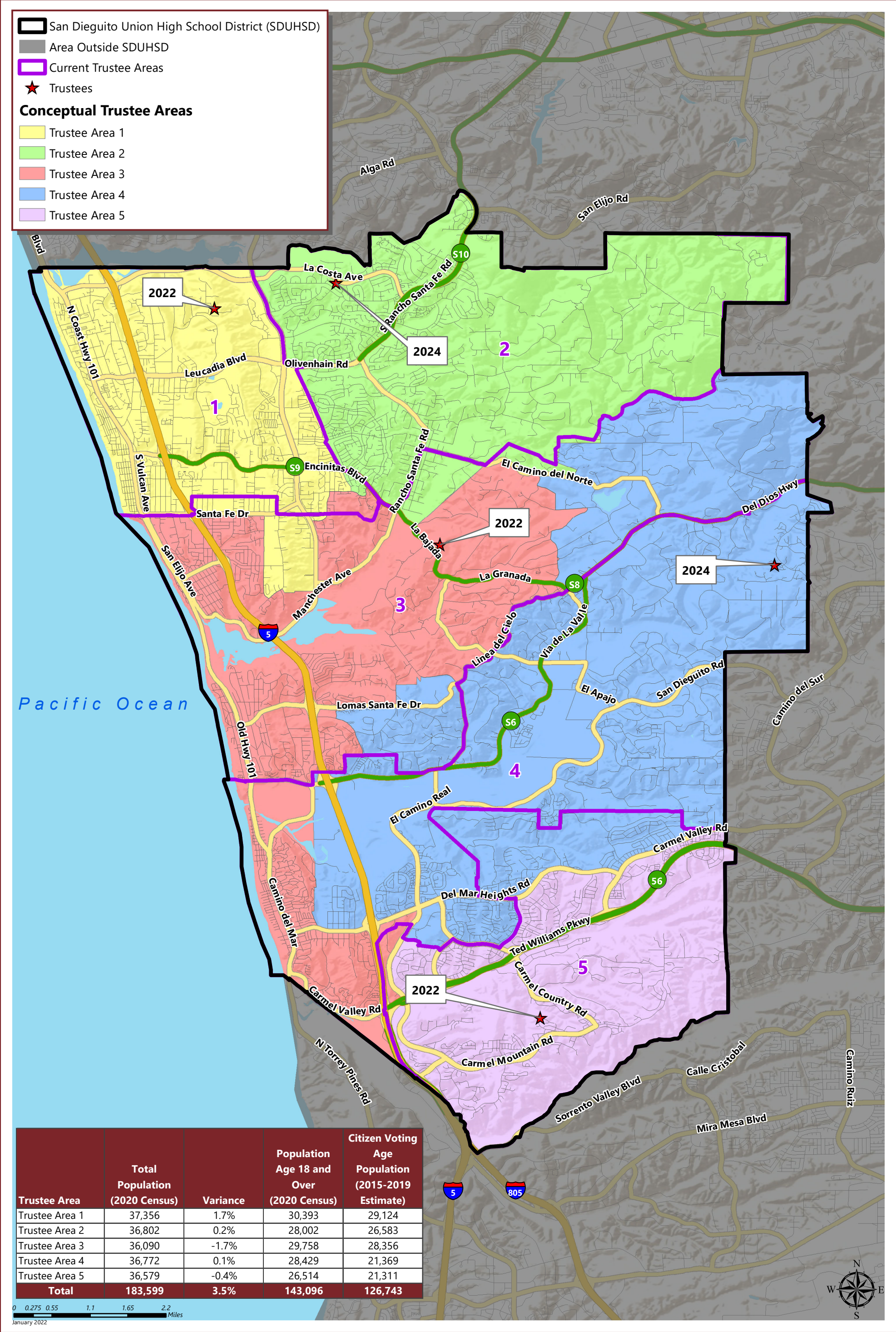
Total Population (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	37,595	36,433	36,220	36,772	36,579
Population Variance	875	-287	-500	52	-141
	2.4%	-0.8%	-1.4%	0.1%	-0.4%
Hispanic/Latino	16.7%	10.7%	12.0%	7.9%	9.6%
White	72.3%	75.3%	76.4%	61.4%	50.7%
Black/ African American	0.5%	0.7%	0.5%	0.7%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.2%	6.2%	4.8%	24.0%	31.2%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.6%	0.6%	0.7%	0.7%	0.5%
Two or More Races	5.4%	6.3%	5.2%	5.1%	6.6%

Population 18 and Over (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	30,598	27,669	29,886	28,429	26,514
Hispanic/Latino	15.2%	9.7%	10.5%	7.3%	8.8%
White	74.7%	77.4%	78.8%	64.9%	53.9%
Black/ African American	0.6%	0.7%	0.6%	0.8%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.6%	6.8%	5.0%	22.5%	30.9%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.5%	0.6%	0.7%	0.6%	0.5%
Two or More Races	4.2%	4.6%	4.1%	3.8%	4.6%

Citizens by Voting Age Population Estimate (2015-2019)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	29,091	26,221	28,751	21,369	21,311
Hispanic/Latino	11.3%	8.3%	8.8%	6.5%	8.4%
White	81.7%	83.1%	84.0%	74.2%	62.9%
Black/ African American	0.8%	0.8%	1.1%	1.2%	0.6%
American Indian/ Alaska Native	0.2%	0.3%	0.1%	0.0%	0.9%
Asian	4.4%	5.4%	3.9%	16.0%	24.9%
Native Hawaiian/ Other Pacific Islander	0.1%	0.3%	0.0%	0.0%	0.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	1.4%	1.8%	2.1%	2.2%	2.3%

SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 2



SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 2

Total Population:	183,599	Ideal Population:	36,720	Variance:	3.4%
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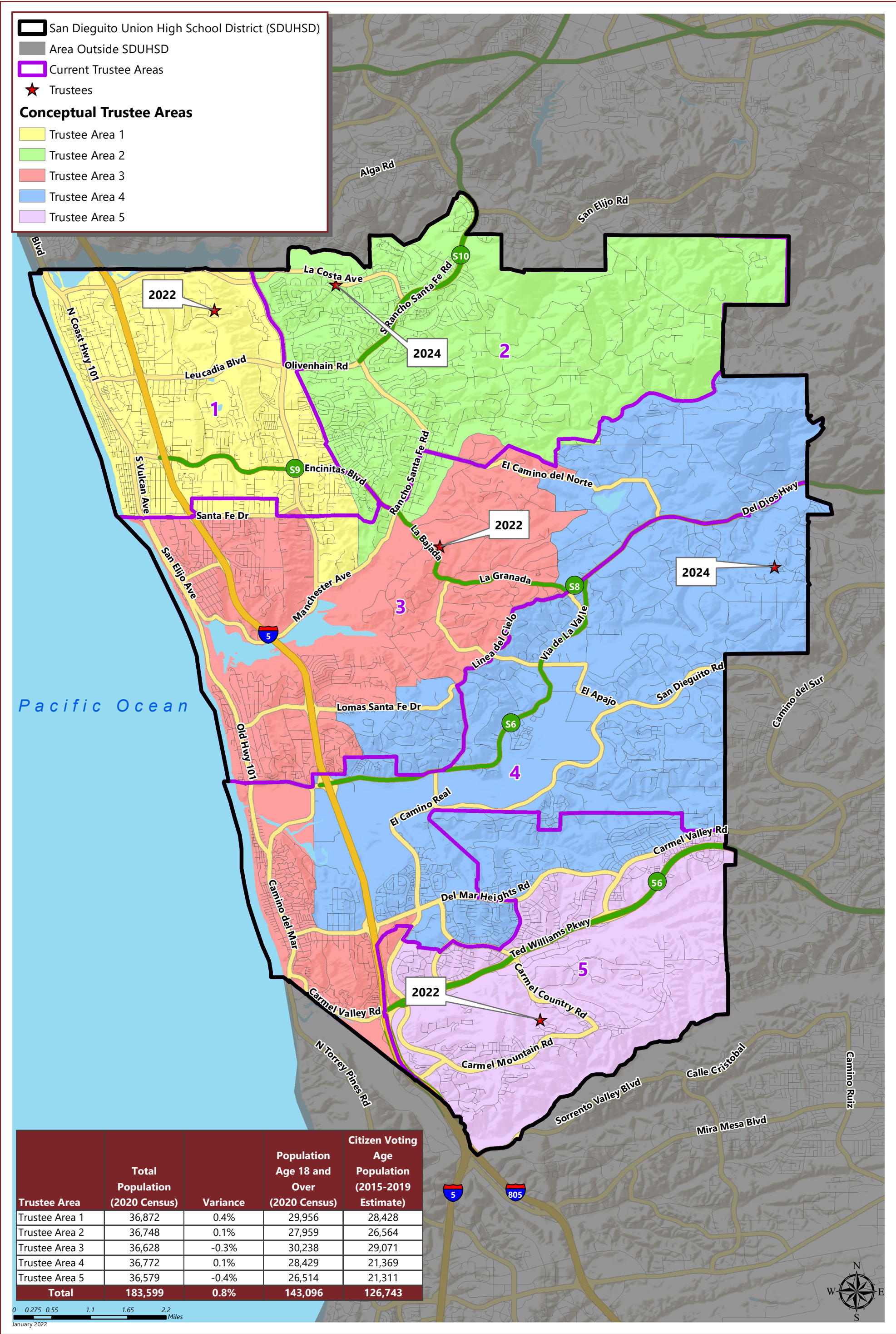
Total Population (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	37,356	36,802	36,090	36,772	36,579
Population Variance	636	82	-630	52	-141
	1.7%	0.2%	-1.7%	0.1%	-0.4%
Hispanic/Latino	16.8%	10.7%	11.9%	7.9%	9.6%
White	72.0%	75.3%	76.7%	61.4%	50.7%
Black/ African American	0.5%	0.7%	0.5%	0.7%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.1%	0.1%	0.1%
Asian	4.3%	6.2%	4.7%	24.0%	31.2%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.6%	0.6%	0.7%	0.7%	0.5%
Two or More Races	5.5%	6.3%	5.2%	5.1%	6.6%

Population 18 and Over (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	30,393	28,002	29,758	28,429	26,514
Hispanic/Latino	15.3%	9.7%	10.5%	7.3%	8.8%
White	74.4%	77.5%	79.0%	64.9%	53.9%
Black/ African American	0.6%	0.7%	0.5%	0.8%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.6%	6.7%	5.0%	22.5%	30.9%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.5%	0.6%	0.6%	0.6%	0.5%
Two or More Races	4.3%	4.6%	4.0%	3.8%	4.6%

Citizens by Voting Age Population Estimate (2015-2019)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	29,124	26,583	28,356	21,369	21,311
Hispanic/Latino	11.2%	8.8%	8.6%	6.5%	8.4%
White	81.5%	82.7%	84.5%	74.2%	62.9%
Black/ African American	1.0%	0.8%	0.9%	1.2%	0.6%
American Indian/ Alaska Native	0.2%	0.3%	0.1%	0.0%	0.9%
Asian	4.5%	5.3%	3.9%	16.0%	24.9%
Native Hawaiian/ Other Pacific Islander	0.1%	0.3%	0.0%	0.0%	0.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	1.5%	1.8%	2.1%	2.2%	2.3%

SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 3



SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 3

Total Population:	183,599	Ideal Population:	36,720	Variance:	0.8%
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Total Population (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	36,872	36,748	36,628	36,772	36,579
Population Variance	152	28	-92	52	-141
	0.4%	0.1%	-0.3%	0.1%	-0.4%
Hispanic/Latino	16.8%	10.7%	12.0%	7.9%	9.6%
White	72.1%	75.3%	76.5%	61.4%	50.7%
Black/ African American	0.5%	0.7%	0.5%	0.7%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.2%	6.2%	4.8%	24.0%	31.2%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.5%	0.6%	0.7%	0.7%	0.5%
Two or More Races	5.5%	6.3%	5.2%	5.1%	6.6%

Population 18 and Over (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	29,956	27,959	30,238	28,429	26,514
Hispanic/Latino	15.4%	9.7%	10.5%	7.3%	8.8%
White	74.4%	77.4%	78.9%	64.9%	53.9%
Black/ African American	0.6%	0.7%	0.5%	0.8%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.6%	6.7%	5.0%	22.5%	30.9%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.5%	0.6%	0.6%	0.6%	0.5%
Two or More Races	4.2%	4.6%	4.1%	3.8%	4.6%

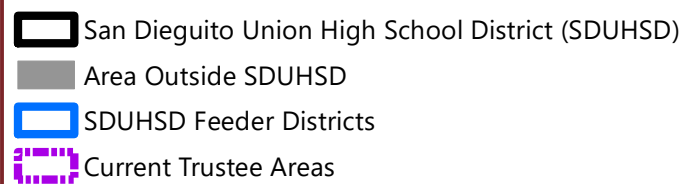
Citizens by Voting Age Population Estimate (2015-2019)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	28,428	26,564	29,071	21,369	21,311
Hispanic/Latino	10.7%	9.1%	8.8%	6.5%	8.4%
White	82.1%	82.4%	84.1%	74.2%	62.9%
Black/ African American	0.8%	0.8%	1.1%	1.2%	0.6%
American Indian/ Alaska Native	0.2%	0.3%	0.1%	0.0%	0.9%
Asian	4.5%	5.3%	3.9%	16.0%	24.9%
Native Hawaiian/ Other Pacific Islander	0.1%	0.3%	0.0%	0.0%	0.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	1.5%	1.8%	2.0%	2.2%	2.3%

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE**




Exhibit 6

SAN DIEGUITO UNION HIGH SCHOOL DISTRICT






CONCEPTUAL TRUSTEE AREAS - SCENARIO 1C



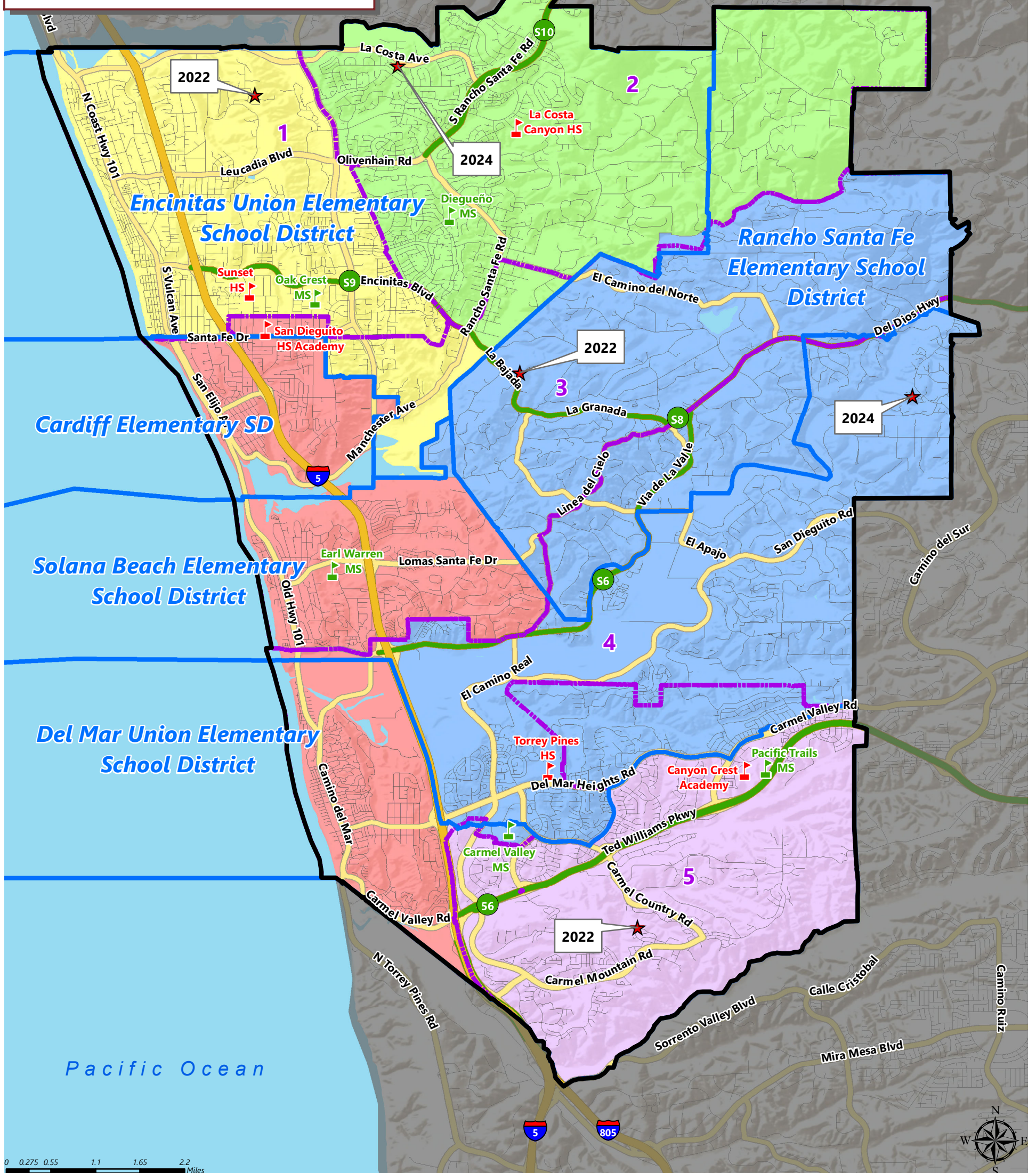
School Facilities

-  Middle Schools
-  High Schools
-  Trustees

Conceptual Trustee Areas

-  Trustee Area 1
-  Trustee Area 2
-  Trustee Area 3
-  Trustee Area 4
-  Trustee Area 5

Trustee Area	Total Population (2020 Census)	Variance	Population Age 18 and Over (2020 Census)	Citizen Voting Age Population (2015-2019 Estimate)
Trustee Area 1	36,537	-0.5%	29,765	28,434
Trustee Area 2	36,393	-0.9%	27,633	26,193
Trustee Area 3	38,299	4.3%	31,549	30,175
Trustee Area 4	35,600	-3.1%	27,465	20,483
Trustee Area 5	36,770	0.1%	26,684	21,458
Total	183,599	7.4%	143,096	126,743



SAN DIEGUITO UNION HIGH SCHOOL DISTRICT

CONCEPTUAL TRUSTEE AREAS - SCENARIO 1C

Total Population:	183,599	Ideal Population:	36,720	Variance:	7.4%
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Total Population (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	36,537	36,393	38,299	35,600	36,770
Population Variance	-183	-327	1,579	-1,120	50
	-0.5%	-0.9%	4.3%	-3.1%	0.1%
Hispanic/Latino	15.5%	10.7%	12.9%	8.1%	9.6%
White	73.3%	75.3%	75.5%	60.9%	50.7%
Black/ African American	0.5%	0.7%	0.5%	0.8%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.3%	6.2%	4.9%	24.3%	31.1%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.6%	0.6%	0.7%	0.7%	0.5%
Two or More Races	5.5%	6.3%	5.2%	5.0%	6.6%

Population 18 and Over (2020 Census)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	29,765	27,633	31,549	27,465	26,684
Hispanic/Latino	14.1%	9.7%	11.5%	7.5%	8.8%
White	75.7%	77.4%	77.8%	64.4%	54.0%
Black/ African American	0.5%	0.7%	0.5%	0.8%	1.1%
American Indian/ Alaska Native	0.2%	0.1%	0.2%	0.1%	0.1%
Asian	4.6%	6.8%	5.2%	22.8%	30.8%
Native Hawaiian/ Other Pacific Islander	0.1%	0.1%	0.1%	0.1%	0.1%
Other	0.5%	0.6%	0.6%	0.6%	0.5%
Two or More Races	4.3%	4.6%	4.1%	3.8%	4.6%

Citizens by Voting Age Population Estimate (2015-2019)					
	Trustee Area 1	Trustee Area 2	Trustee Area 3	Trustee Area 4	Trustee Area 5
Population	28,434	26,193	30,175	20,483	21,458
Hispanic/Latino	10.7%	8.3%	9.2%	6.9%	8.4%
White	82.4%	83.1%	83.3%	73.8%	63.0%
Black/ African American	0.6%	0.8%	1.2%	1.2%	0.8%
American Indian/ Alaska Native	0.2%	0.3%	0.0%	0.0%	0.8%
Asian	4.5%	5.4%	4.3%	15.8%	24.8%
Native Hawaiian/ Other Pacific Islander	0.1%	0.3%	0.0%	0.0%	0.0%
Other	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	1.6%	1.8%	1.9%	2.2%	2.2%

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF San Diego

I have read the foregoing COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE and know its contents.

☒ CHECK APPLICABLE PARAGRAPH

☒ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am ☐ an Officer ☐ a partner ☐ a of

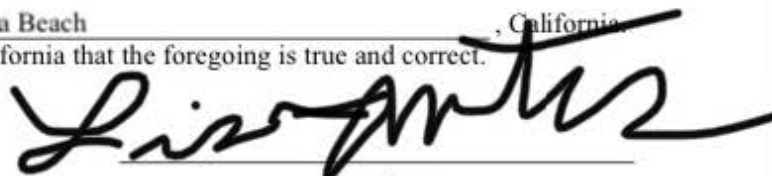
a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. ☒ I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. ☐ The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on February 21, 20 22, at Solana Beach, California.
 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Lisa Montes

Type or Print Name



Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of _____, State of California.
 I am over the age of 18 and not a party to the within action; my business address is, _____

On _____, 20 _____, I served the foregoing document described as _____

☐ _____ on _____ in this action
 by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:
☐ by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelopes addressed as follows:

☐ BY MAIL

☐ * I deposited such envelope in the mail at _____, California.

The envelope was mailed with postage thereon fully prepaid.

☐ As follows I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at _____ California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on _____, 20 _____, at _____, California.

☐ **(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on _____, 20 _____, at _____, California.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I
☐ (Federal) declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

* (By MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG)

** (FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF San Diego

I have read the foregoing COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION
FOR WRIT OF MANDATE and know its contents.

☒ **CHECK APPLICABLE PARAGRAPH**

☒ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am ☐ an Officer ☐ a partner _____ ☐ a _____ of _____

_____ ,
a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. ☒ I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. ☐ The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am one of the attorneys for _____
a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on February 21, 20 22, at San Diego, California.
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Carol Chang

Type or Print Name



Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of _____, State of California.

I am over the age of 18 and not a party to the within action; my business address is, _____

On _____, 20 _____, I served the foregoing document described as _____

☐ _____ on _____ in this action

☐ by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:

☐ by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelopes addressed as follows:

☐ **BY MAIL**

☐ * I deposited such envelope in the mail at _____, California.

The envelope was mailed with postage thereon fully prepaid.

☐ As follows I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing.

Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at _____ California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on _____, 20 _____, at _____, California.

☐ **(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on _____, 20 _____, at _____, California.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. I

☐ (Federal) declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

* (By MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG)

** (FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)