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July 11, 2014
**Commission on
State Mandates**

July 11, 2014

Ms. Heather Halsey
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Ms. Halsey,

RE: Claimant's Comments on Draft Proposed Decision
Top Two Candidates Open Primary Act (12-TC-02)

The County of Sacramento respectfully submits comments on the draft proposed decision, issued May 19, 2014, on the Top Two Candidates Open Primary Act (Top Two) test claim. The Claimant's response clearly shows state mandated activities resulting from the cited statutes and executive orders.

The staff's draft proposed decision discusses many court cases that purport to relate to the Top Two test claim. The report contends that GC 17556 (f) applies to this entire test claim because the Proposition was voter approved and therefore is not part of the mandate process. Claimant believes otherwise. SCA 4 / Proposition 14 contained very clear ballot measure language. This very clear language was altered and in some cases even superseded by legislative statutes and executive orders that were not necessary to implement or incidental to SCA 4 / Proposition 14.

The report further goes on to explain that because the State is the responsible party, the Counties have no new or higher level of service. This is factually incorrect. The State is the State Election Official, but has no ability to conduct an election; issue, process or validate candidate nomination paperwork; prepare official ballots; present voter specific sample ballot pamphlets; or even process affidavits of registration. These are all activities handled by Counties. As such, the Top Two test claim is very much a mandate to Counties who bear the burden of the activities identified in the test claim.

Staff provided a chart of their issues and their reasons for denial. Below is the Claimants response to each item in the chart.

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Staff Subject	Staff Description	Claimant Response
<p>Statutes 2009, chapter 2 (SCA4)/ Proposition 4 [sic]</p>	<p>SCA 4 put before the voters a proposed amendment to article II of the California Constitution, providing for a top-two candidates open primary for all congressional and state elected offices. SCA 4 was approved by the voters as Proposition 14 on June 8, 2010</p>	<p>SCA 4 / Proposition 14 provided very clear language for a Top Two Candidates Open Primary Act. In fact, SCA 4 / Proposition 14 was an attempt to turn away from party driven elections and addressed party registration, candidate disclosure, primary elections, freedom of political parties and presidential primaries. SCA 4 / Proposition 14 does not impose the mandate. It is SB 6 and AB 1413 together that defined a complex and party-centric implementation of the Top Two Candidates Open Primary Act which exceeded the plain language and in some instances changed the intention of SCA 4 / Proposition 14 that has produced the mandate.</p> <p>This legislation set out new or higher levels of service than previously provided for in code, without regard to efficiencies, effectiveness, or cost burdens to the local election offices. These new and higher levels of services are not necessary to implement nor are they incidental to SCA 4 / Proposition 14.</p> <p>The costs resulting from these new and higher levels of service are not de minimus.</p>
<p>Elections Code section 13, 300.5, 325, 332.5, 334, 337, 359.5, as added or amended by Statutes 2009, chapter 1 (SB6).</p>	<p>Section 13, as amended, states that no person shall be considered a legally qualified candidate in a general election unless that person has filed a declaration of candidacy or statement of write-in candidacy, or has been nominated at a primary election, or has been selected to fill a vacancy on the general election ballot, or has been selected as an independent candidate. Sections 300.5, 325, 332.5, 334, 337 and 359.5 define the terms "affiliated with a political party," "independent status," "nominate," "nonpartisan office," "partisan office" or "party nominated</p>	<p>While SCA 4 / Proposition 14 set forth party-nominated and voter-nominated offices, SB 6 and AB 1413 went beyond what was necessary to implement the change in SCA 4 / Proposition 14's very plain language.</p> <p>Nothing in SCA 4 / Proposition 14 addresses the elimination of write-in candidates in the General election. Election Code Section 13 previously allowed write-in candidates for any election. With the enactment of SB 6 and AB 1413, write-in candidacy for voter-nominated offices were limited to primary elections only, eliminating this opportunity for write-in candidates in voter-nominated contests in the general election.</p> <p>300.5 – affiliated with a political party, as applies to a candidate, is contrary to how SCA 4 / Proposition 14 defined the word which clearly</p>

	<p>office,” and “voter-nominated office.”</p>	<p>states ‘all candidates shall have the choice to declare a party preference’ without any association to their affidavit of registration.</p> <p>359.5 – defines voter nominated, and its offices. The Counties must put all these in the various documents, manuals, media, publications, etc; on-going and extensive training for poll workers, voters, candidates; Implementation/training/information is a burden placed on the County election official when it is better located at the State level as these are all State level or higher offices. As such, transferring the training and information duties to the County is a practical mandate.</p>
<p>Elections Code section 13230, as amended by Statutes 2009, chapter 1 (SB6)</p>	<p>Section 13230 was amended to provide that if the county elections official determines that the number of candidates and measures that must be printed will result in a ballot that is too large to be conveniently handled, and decides to separate the nonpartisan and partisan portions of the ballot, the voter instructions described under section 13206 pertaining to voter-nominated and nonpartisan offices may be omitted from the partisan ballots.</p>	<p>The intent of the legislature in putting forth the elections code is to ensure equal access to voting; giving voters a ballot ‘larger than may be conveniently handled’ disenfranchises voters and candidates to the extent that down-ballot contests are avoided.</p> <p>Previous code allowed all nonpartisan contests to be on one ballot card and all other contests (at that time, partisan races) to be on another card; SB6 changed this to require voter-nominated contests stay with nonpartisan races on one ballot card, thereby continuing the problem of ballots being ‘larger than can be conveniently handled’.</p> <p>Presenting the party-nominated contests on a separate ballot card appears to meet the intent of the legislature under the existing law, but in reality continues the voter disenfranchisement. By simply removing the party-nominated contests (president and central committee) the ballot is still ‘larger than can be conveniently handled’. The voter-nominated contests are now placed with the nonpartisan contests and result in ballots that continue to be ‘larger than can be conveniently handled’.</p>
<p>Elections Code section 8002.5, as amended by Statutes 2012, chapter 3 (SB1413) [sic].</p>	<p>Section 8002.5, as amended, provides that a candidate for a voter-nominated office shall either indicate a party preference, or indicate no party preference, “which shall be consistent with what appears on</p>	<p>SCA 4 / Proposition 14 Second subdivision paragraph (d) states ‘At the time they file to run for public office, all candidates shall have the choice to declare a party preference. The preference chosen shall accompany the candidate’s name on both the primary and general election ballots. The names of candidates who</p>

	<p>the candidate's most recent affidavit of registration."</p>	<p>choose not to declare a party preference shall be accompanied by the designation "No Party Preference" on both the primary and general election ballots.' The legislature, by implementing AB 1413, changed the intention of SCA 4 / Proposition 14 from a candidate's political party <i>preference</i> to a candidate's political party <i>registration</i>. The change is significant as it voids the candidates 'choice' to declare their party preference and requires the candidate to use only the political party with which they are registered at the time they file for office. This legislation is not necessary to implement nor incidental to SCA 4 / Proposition 14.</p> <p>This task does impose additional activities and tasks on County election officials. Candidates file at the County election office, and it is the County election official that is responsible for interacting with the candidates, requesting the newly required information, and ensuring filing paperwork is completed as required by this new law. The cost is not de minimus.</p>
<p>Elections Code section 8040, as amended by Statutes 2012, chapter 3 (SB1413) [sic].</p>	<p>Section 8040, as amended, omits from the Declaration of Candidacy filed by each candidate the initial declaration of party affiliation, and also requires that candidates for voter-nominated offices certify their voter registration history and their disclosed party preference.</p>	<p>SCA 4 / Proposition 14 does not include any requirement for candidates to disclose their prior 10 years voter registration history. This requirement is clearly a mandate put forth by the legislature in AB 1413.</p> <p>This requirement does impose additional activities and tasks on County election officials as the new form requires information not previously mandated. Candidates file at the County election office, and it is the County election official that is responsible for interacting with the candidates, requesting the newly required information, and ensuring filing paperwork is completed as required by this new law. Should the County not gather this information, the candidate will not be qualified to run for office; the burden is on the County to accept and timely file candidate's paperwork.</p> <p>This information and related activity is not necessary to implement nor incidental to SCA 4 / Proposition 14; new and higher level of services</p>

<p>Elections Code 8062, as amended by Statutes 2012, chapter 3 (SB 1413) [sic].</p>	<p>Section 8062, as amended, changes the word "less than," as it pertains to the number of signatures needed to nominate a person for a primary election, to "fewer than," and adds the word "State" before "Board of Equalization."</p>	<p>required in AB 1413 are not de minimus.</p> <p>The amendment put forth by Claimant references Section 8106 in place of Section 8062. SCA 4 / Proposition 14 does not include any language relative to candidate petition-in-lieu filing. AB 1413 changed the number of signatures required from minor party candidates from 150 to 1,500 for Assembly, 3,000 for State Senate or Congress, and 10,000 for statewide offices. This significantly increases the amount of work County election officials must do to validate these minor party candidate filings.</p> <p>This language is not required in the plain language of SCA 4 / Proposition 14. The costs to perform this mandate are not de minimus.</p>
<p>Reorganization of the ballot pursuant to Elections Code sections 13102 and 13110, as amended by Stats. 2009, ch.1 (SB6).</p>	<p>The test claim statutes require counties to provide the names of candidates for voter-nominated offices on the ballots of all voters, but to provide the names of presidential and party committee candidates only on the ballots of partisan voters.</p>	<p>SCA 4 / Proposition 14 Third subdivision, section (c) states 'The Legislature shall provide for primary partisan election for partisan offices <i>presidential candidates, and political party and party central committees</i>, including an open presidential primary...' This language is plain and clear in its directive that presidential primary elections be <i>open</i>. As such, there is no need to prepare a partisan ballot in any primary election.</p> <p>The Legislature, in passing SB6, implemented partisan ballot rules that exceeded the plain language of SCA 4 / Proposition 14. The partisan ballot rules found in the codes changed by SB6 set out specific rules for political party ballots in primary elections, rules that were not contemplated in the SCA 4 / Proposition 14. This is not needed to implement, nor incidental to SCA 4 / Proposition 14.</p>
<p>Addition of party preference designation and use of three lines for each candidate's entry, pursuant to Elections Code section 13105, as amended by Statutes 2009, chapter 1 (SB6), Statutes 2012,</p>	<p>Section 13105 requires counties to include each candidate's party preference designation in both the primary and the general election ballots, using the party preference designation phrases, as specified in the amended code section and in CC/ROV #11125 and CC/ROV #12059. CC/ROV #11005 applies this requirement to special primary elections containing voter-nominated</p>	<p>The wording 'party preference' is not required ballot wording in SCA 4 / Proposition 14 and is not necessary to implement the plain language requirements of SCA 4 / Proposition 14. The 'party preference' requirement was promulgated in SB 6 and AB 1413, as well as the CCROV's noted in this filing.</p> <p>For counties that are required to provide materials in alternate languages, this 'party preference' wording after each voter-nominated candidate makes the official ballot longer by one line for each candidate on the ballot, in some cases</p>

<p>chapter 3 (AB 1413); CC/ROV #11005; CC/ROV #11125; CC/ROV#12059.</p>	<p>offices, and CC/ROV #11005, and the later orders, require the use of three consecutive lines for each candidate's name, party preference designation, and ballot designation.</p>	<p>several inches longer.</p> <p>The ballot is the most costly part of any election and the legislation and CCROVs could have directed the counties to provide a definition of the party preference in the sample ballot pamphlet at a much reduced, and even de minimus, cost. They did not. Adding the words 'party preference' after each voter-nominated candidate on the ballot results in longer ballots cards and even additional ballot cards. The resulting costs are not de minimus.</p>
<p>Receipt and printing of party endorsements pursuant to Elections Code section 13302, as amended by Stats. 2009, ch. 1 (SB 6); Stats. 2012, ch. 3 (AB 1413); CC/ROV #11005.</p>	<p>Section 13302 requires counties to receive and print in the voter information section of the sample ballot a list of endorsements, if timely received, from a qualified political party. CC/ROV #11005 applies this section also to special elections, with "shortened time frame[s]."</p>	<p>SCA 4/ Proposition 14 does not provide for, nor in any manner of interpretation, require counties to provide, at the counties' costs, sample ballot pamphlet endorsement pages for the California's qualified political parties.</p> <p>SCA 4 / Proposition 14 clearly states that 'Political Parties may establish such procedures as they see fit to endorse or support candidates or otherwise participate in all elections,...' Nothing in this wording requires the county to receive and print a list of party endorsements at the County's cost in order to implement SCA 4 / Proposition 14. Nor would such page be incidental to SCA 4 / Proposition 14.</p> <p>Costs to comply with the mandate language in both SB6 and AB 1413 exceed \$1,000 which meets the threshold for mandate claiming and therefore are not de minimus.</p>
<p>Additional instructions in the ballot, and posters furnished to precincts and posted conspicuously at polling places, pursuant to sections 13206, 13206.5, 9083.5, and 14105.1, as added or amended by Statutes 2009, chapter 1 (SB 6) and Statutes 2012,</p>	<p>Sections 13206 and 13206.5 provide for additional instructions to be added to the ballots for primary and general elections, including special instructions for a presidential election cycle. Sections 9083.5 and 14105.1 provide for posters to be furnished to precincts and posted at polling places explaining the changes to primary elections. CC/ROV#11005 provides for the text specified in section 9083.5 to be provided in the ballot for special elections,</p>	<p>SCA 4 / Proposition 14 does not provide for any type of additional instructions or ballot text in the absence of voter information guides. Further, additional instructions or ballot text is not required to implement nor incidental to SCA 4 / Proposition 14. This is burdensome to the counties in that it requires significant time to produce, translate, prepare, and distribute these instructional materials.</p> <p>Government Code 17556 (f) does not apply here as these activities are not expressly included in the ballot measure and are not necessary to implement SCA 4 / Proposition 14. This ballot text and additional instructions only appear in the legislation and executive orders cited in this</p>


chapter 3 (AB 1413); CC/ROV #11005; CC/ROV #11126; CC/ROV#12059.	because there would be no voter information guide. CC/ROV #11126 provides for omitting the language in section 13206(b) pertaining to nonpartisan offices for the June 2012 primary election. And CC/ROV #12059 restates and explains the minor technical amendments made to section 13206, 13206.5, 9083.5, and 14105.1 by Statutes 2012, chapter 3 (AB 1413).	letter. Even should the Commission find they are necessary, these methods are not the least burdensome method for providing the information to the voters. The costs related to these activities are not de minimus for the Claimant, exceeding the \$1000 threshold required for mandate claiming.
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The Claimant respectfully requests the Commission find that the activities and costs pled in the test claim and amended test claim are not due to language contained in, incidental to or required to implement SCA 4 / Proposition 14. Further, Claimant requests the Commission find the test claim statutes and executive orders cited in the test claim and amended test claim do impose new mandated activities and results in costs mandated by the State, resulting in a reimbursable state-mandated program within the meaning of article XIII B, section 6 of the California Constitution.

Pursuant to section 1181.2, subdivision (c)(1)(E) of the California Code of Regulations, "documents that are e-filed with the Commission need not be otherwise served on persons that have provided an e-mail address for the mailing list."

If you have any questions regarding this letter, please feel free to contact me at (916) 875 6255.

Sincerely,


Alice Jarboe, Claimant Representative
Assistant Registrar of Voters
Sacramento County

cc: Julie Valverde, Sacramento County Director of Finance

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Solano and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On July 14, 2014, I served the:

Claimant Comments

Top Two Candidates Open Primary Act, 12-TC-02

Statutes 2009, Chapter 2 (SCA 4); Statutes 2009, Chapter 1 (SB 6); Statutes 2012, Chapter 3 (AB 1413)

Secretary of State's CC/ROV Memorandums #11005, #11125, #11126, and #12059
County of Sacramento, Claimant

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on July 14, 2014 at Sacramento, California.



Heidi J. Palchik
Commission on State Mandates
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 7/1/14

Claim Number: 12-TC-02

Matter: Top Two Candidates Open Primary Act

Claimant: County of Sacramento

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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