



March 25, 2025

RECEIVED
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**Commission on
State Mandates**

Juliana Gmur
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Test Claim 24-TC-01, Elections: Ballot Label

Dear Director Gmur:

The Department of Finance (Finance) has completed its review of the amended test claim 24-TC-01 submitted to the Commission on State Mandates (Commission) by the County of Los Angeles (Claimant), in which the Claimant alleges it incurred reimbursable, state-mandated costs associated with Chapter 751, Statutes of 2022 (Assembly Bill 1416).

Prior to 2023, the Elections Code required that a ballot contain the title of each office, the names of all qualified candidates, ballot designations, titles and summaries of measures submitted to voters, and instructions to voters, among other things.

Effective January 1, 2023, AB 1416 amended section 9051 to the Elections Code to require ballot labels, where supporters or opponents are listed on the ballot, to include a listing of specified associations, nonprofit organizations, businesses, or individuals. The list is taken from the signers or the text of the arguments in support of and in opposition to the measure printed in the voter information guide.

The Claimant alleges it incurred \$62,092 in state-mandated, reimbursable costs in fiscal year 2023-24 to comply with Elections Code section 9051(c)(1)(A) and (B) and estimates \$383,842 in such costs in 2024-25. This section of Elections Code applies to statewide ballot measures.

Finance notes, however, that AB 1416 also amended Elections Code section 9170(a)(1) and (2) as it pertains to county, city, district, or school measures. These provisions reference the same list of supporters and opponents as required for statewide ballot measures, but provide local jurisdictions with discretion to exclude this list. Therefore, costs related to the county, city, district, or school measures are not state-reimbursable per subdivision (d) of Elections Code section 9170, excerpted below.

“(d) At least 30 days before the deadline for submitting arguments for or against county measures, a county board of supervisors may elect not to list supporters

and opponents for county, city, district and school measures on the county ballot and future county ballots."

Upon review of the Declaration of Jennifer Storm, the declaration's first footnote leads Finance to believe the Claimant's cost estimates include both statewide measures and city, county, district, and school measures:

The November 2022 election had four statewide and more than 20 local measures, which would result in an additional 2,681,250 total ballot cards. RR/CC estimates the November 2024 election would incur approximately half the number of additional cards ($2,681,250/2 = 1,340,625$ (7.5% increase)). In addition, we used the March 2024 actual additional cards percentage of 1.5% or 258,716 increase in ballot cards for an estimate of the June 2025 election. The estimated number of ballot cards for two elections in a calendar year is $1,340,625 + 258,716 = 1,599,341$. Applying the cost for each ballot card (\$0.22) and the cost for the additional ballot insert wrap (\$.02) needed for the AB 1416 mandate, the total cost for the County of Los Angeles is calculated at \$383,842 [$(\$0.22 \times 1,599,341) + (1,599,341 \times .02) = \$351,855 + \$31,987 = \$383,842$].

Finance notes that the Claimant's estimate of 1,340,625 additional ballot cards for the November 2024 election is based off of the 2,681,250 total ballot cards used in the four statewide and more than 20 local measures for the November 2022 election. As noted above, AB 1416 does not require local measures to include a list of supporters and opponents.

If the Commission determines AB 1416 imposes reimbursable, state-mandated costs on local agencies, Finance recommends the Commission examine the estimated costs cited by the Claimant to ensure costs related to city, county, district, or school measures are not considered reimbursable.

If you have any questions regarding this letter, please contact Chris Hill, Principal Program Budget Analyst at (916) 445-3274.

Sincerely,



MEAGAN TOKUNAGA BLOCK
Assistant Program Budget Manager

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento 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 March 25, 2025, I served the:

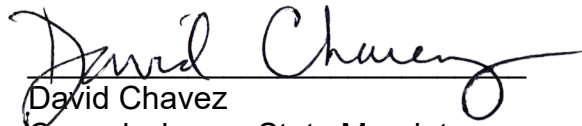
- **Current Mailing List dated February 28, 2025**
- **Finance's Comments on the Test Claim filed March 25, 2025**

Elections: Ballot Label, 24-TC-01

Statutes 2022, Chapter 751, Section 5 (AB 1416); Elections Code Section 9151
County of Los Angeles, 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 March 25, 2025 at Sacramento, California.



David Chavez
Commission on State Mandates
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 2/28/25

**Claim
Number:** 24-TC-01

Matter: Elections: Ballot Label

Claimant: County of Los Angeles

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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