



25-LDM-02

October 15, 2025

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RE: Legislatively Determined Mandate
Law enforcement: Criminal statistics
(Assembly Bill 2695; Statutes 2024, Chapter 662)

Dear Director Stephenshaw and Executive Director Gmur:

Rural County Representatives of California (RCRC), a statewide association of California's rural counties, hereby requests to initiate a Joint Request for Legislatively Determined Mandate (LDM) pursuant to Government Code section 17573 regarding the above-captioned statute. The Department's bill analysis dated July 20, 2024 (attached) acknowledges that this statute "may create a state-reimbursable mandate," and we are looking forward to working with the Department to follow the process set forth in Section 17573 to develop a Joint Request for presentation to the Legislature.

By copy of this letter to the Commission on State Mandates, RCRC requests acknowledgement that the statute of limitations to file a test claim is tolled as of the date of this notice pursuant to Government Code section 17573, subdivision (b). While this matter is pending, RCRC or the Department shall notify the Commission of actions taken as set forth below, in accordance with subdivision (g) of Section 17573:

- Provide the Commission with a copy of any communications regarding development of a joint request under this section and a copy of a joint request when it is submitted to the Legislature.
- Notify the Commission of the date of (A) the Legislature's action on a joint request in the Budget Act, or (B) the Department's decision not to submit a joint request.

Please do not hesitate to contact us if you have any questions, or would like to schedule a meeting to discuss the next steps in the LDM process.

Very truly yours,

ARTHUR J. WYLENE, General Counsel
Rural County Representatives of California

DEPARTMENT OF FINANCE BILL ANALYSIS

AMENDMENT DATE: 05/16/2024
POSITION: Oppose

BILL NUMBER: AB 2695
AUTHOR: Ramos, James

BILL SUMMARY: Law enforcement: criminal statistics.

This bill requires all entities and individuals that report crime and delinquency data to the DOJ to disaggregate that data based on whether the incidents took place in Indian country.

FISCAL SUMMARY

The DOJ anticipates costs of \$430,000 General Fund in 2024-25 and \$130,000 General Fund in 2025-26 and ongoing and 1 position to implement the requirements of the bill. This includes \$300,000 one-time in 2024-25 to modify the existing California Incident-Based Reporting System.

This bill may create a state-reimbursable mandate because it requires a higher level of service to be provided by local agencies. Reporting agencies may incur costs to comply with the additional reporting requirement. Finance notes that there may be significant one-time costs to update internal data tracking systems for law enforcement agencies, potentially of a similar magnitude of the costs to the DOJ.

At the time of this analysis, the California Highway Patrol had not provided a fiscal estimate of the implementation costs associated with this bill.

COMMENTS

The Department of Finance is opposed to this bill because it results in General Fund costs not included in the 2024 Budget Act and may create a potentially significant state reimbursable mandate.

Existing law requires specified individuals and entities dealing with crimes or delinquency to maintain records and report statistical data to the DOJ as prescribed by the Attorney General. Existing law requires the DOJ to transition to an incident-based crime reporting in alignment with the federal National Incident-Based Reporting System. Existing law defines "Indian country" as all land within the limits of any reservation under the jurisdiction of the United States Government.

Code/Department Agency or Revenue Type	SO	(Fiscal Impact by Fiscal Year)					
	LA	(Dollars in Thousands)					
	CO	PROP					Fund
	RV	98	FC	2024-2025	FC	2025-2026	FC 2026-2027 Code
0820/Justice	SO	No	C	430	C	130	C 130 0001

Analyst/Principal Franzoia, Anthony/ Jimenez, Mark	Date	Program Budget Manager Jarvis, Amy	Date
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Department Deputy Director	Date
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Governor's Office:	By:	Date:	Position Approved _____
			Position Disapproved _____

BILL ANALYSIS	Form DF-43 (Rev 03/95 Buff)
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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 October 22, 2025, I served the:

- **Current Mailing List dated October 22, 2025**
- **Notice of Receipt of Letter of Intent to Initiate a Joint Request for a Legislatively Determined Mandate and Tolling of the Statute of Limitations issued October 22, 2025**
- **Letter of Intent to Initiate a Joint Request for a Legislatively Determined Mandate filed by the Rural County Representatives of California (RCRC) filed October 15, 2025**

Law Enforcement: Criminal Statistics, 25-LDM-02

Statutes 2024, Chapter 662 (AB 2695)

Rural County Representatives of California, Requester

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 October 22, 2025 at Sacramento, California.



Jill Magee
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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 10/22/25

Claim Number: 25-LDM-02

Matter: Law Enforcement: Criminal Statistics

Requester: Rural County Representatives of California

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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