



Los Angeles County **REGISTRAR-RECORDER/COUNTY CLERK**

DEAN C. LOGAN
Registrar-Recorder/County Clerk

August 15, 2011

Mr. Ethan Jones, Chief Consultant
Assembly Elections and Redistricting Committee
State Capitol, Rm. 365
Sacramento, CA 95814

Dear Mr. Jones:

I have reviewed the proposed amendments to the statutes enacted by SB 6; implementation of the "Top Two" Primary Election. I am very encouraged by the effort to amend SB 6 to allow for more practical implementation. Los Angeles County faces critical implementation challenges with regard to its voting system. New ballot requirements mandated by SB 6, requiring ballot text and listing of candidates, would stress or even exceed the physical capacity of our current ballot layout and format.

As the elections process changes, Los Angeles County must implement new policies while continuing to provide quality election services in the largest and most complex electoral jurisdiction within the United States. The effort to make technical amendments to existing SB 6 provisions would help ensure we are able to do that.

With that in mind, after reviewing the proposed amendments I feel that some of the changes require clarification to express clear intent, strengthen policy and avoid misinterpretation.

The areas of concern relate to the changes of terminology from "preference" to "affiliate", the change in the interpretation of "top two vote getters", leading to a modification of practice in regard to tie votes; and the leaning away from "voter-nominated: to party-nominated" in the filling of vacancies between primary and general elections.

These areas of concern were detailed in the letter sent to you by the California Association of Clerks and Election Officials (CACEO), which expressed their comments on the proposed amendments. I concur with their interpretation of the proposed changes and share in the concern that misinterpretation of these policies may lead to legal challenges that consequently could affect our ability to conduct the 2012 Primary election.

I remain available for further review or assistance as needed and continue to appreciate your understanding of the very critical nature of these changes for Los Angeles County. If have any questions or concerns please contact me at 562-462-2716.

Sincerely,

DEAN C. LOGAN
Registrar-Recorder/County Clerk