

LEX REX INSTITUTE

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April 28, 2023

Honorable Kevin Crye
Honorable Tim Garman
Honorable Mary Rickert
Honorable Patrick Jones, Chair
Honorable Chris Kelstrom

Re: *Requirements Regarding Compensation of Vote Counters Associated Costs*

All:

I am an attorney working with the Lex Rex Institute, a nonprofit organization dedicated to government accountability and operation within Constitutional limitations. I understand that Shasta County (the “County” and/or “Shasta”) has been exploring options for conducting a manual count of ballots cast in its elections and that there is some confusion about the cost of switching to such a system, especially in regard to the increased employment costs of the additional manpower needed to conduct a manual count.

Specifically, this letter seeks to clarify whether the costs expressed in the Powerpoint presentation presented by Cathy Darling Allen, County Clerk/Registrar of Voters (the “ROV”) at the meeting of the County’s Board of Supervisors on April 25, 2023 are mandatory costs or whether a less expensive option might be available and legally feasible. A true and correct copy of this Powerpoint presentation is attached hereto for your reference as EXHIBIT “A.” To be clear, neither I nor the Lex Rex Institute have been retained by the County and, as such, this letter does not constitute legal advice.

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A. Feasibility of Using Unpaid Volunteer Staff to Count Votes.

For the purposes of the California Elections Code, officials counting votes are considered members of the precinct board, just as any other poll worker would be. *See, e.g.* Cal. Elec. Code § 15276 (“The precinct board members shall each keep a tally sheet”). Accordingly, the statutes governing the compensation of poll workers counting votes do not differ from those pertaining to the compensation of other poll workers, except and unless in the specific instances wherein the Elections Code explicitly provides otherwise. Regarding compensation, to my knowledge, the ROV has cited only two relevant provisions. The first of these provisions, Cal. Elec. Code § 12310,¹ was addressed in my previous letter dated March 30, 2023, a true and correct copy of which is attached hereto for your reference as EXHIBIT “B.” In that letter, I explained that while the statute is technically ambiguous and remains legally untested, it does not appear to foreclose the possibility of hiring volunteer poll workers. This statute has never been interpreted by any court to prohibit the use of volunteer workers and, while it is not impossible that a court *could* find that it prohibits volunteers, the ruling would certainly be a novel interpretation, and would likely come as surprising news to the dozens of California counties currently conducting elections using volunteer poll workers.

Prior to drafting this letter, my staff contacted the offices of the County Clerk/Registrar of Voters for each of the fifty eight (58) California counties (excluding Shasta) and inquired whether each county currently permits volunteers to serve as members of its precinct boards. The results of these phone calls are published for your reference in EXHIBIT “C” to this letter. In summary, of the forty seven (47) counties who answered the call, fifteen (15) counties, fully a quarter of all counties in California, responded that they allowed volunteers.

The second statute the ROV cites in support of the idea that vote counters must be paid is Cal. Elec. Code § 15103, which applies solely to those responsible for counting “vote by mail ballots,”² and for which the same issues apply as to § 12310.

¹“Each member of a precinct board shall receive compensation from the governing body of the jurisdiction. This sum shall be paid out of the treasury of the jurisdiction in which the election is held. The inspector may receive more compensation than the other members of the precinct board. The additional compensation to the inspector is for services rendered in securing precinct board members and other duties which may be directed by the elections official.” Cal. Elec. Code § 12310.

In my previous letter, I noted that it is unclear whether this provision means that each precinct board member must be paid, or whether (as is more consonant with its text and context within the code) it simply specifies who is responsible for their compensation, in the event they are paid.

²“The elections official shall pay a reasonable compensation to each member of the canvassing board of vote by mail ballots. This compensation shall be paid out of the treasury of the agency conducting the election as other claims against it are paid.” Cal. Elec. Code § 15103.

B. Feasibility and Cost of Stipends below the Figure Cited by the ROV.

Even if the County does elect to compensate all of its employees hired for the purpose of counting votes, the numbers presented by the ROV appear to be substantially inflated. The ROV's breakdown specifies the cost of hiring employees paid a stipend compared against the cost of employees paid at minimum wage rates. However, in the ROV's report, differences between the two rates is relatively low – less than 20% in virtually every case. In reality, if the County seeks to maximally save on costs, the expense of stipend employees would be considerably lower than the minimum wage option. In fact, the California Secretary of State's own website provides a *recommended* stipend as low as \$65³ – a fraction of the \$217.50 cost of minimum wage for the standard fourteen (14) hour election day (before factoring in any added costs from overtime and payroll tax). Of the counties that do not permit volunteer poll workers, twenty (20) told us that they pay stipends to their poll workers (the rest use existing county staff or compensate on an hourly basis). *See* Ex. "C" (reflecting my staff's phone calls to each county's registrar). Of these twenty (20) counties, nineteen (19) pay stipends that, if extrapolated out on an hourly basis for the duration of the election day, would be below the California minimum wage, with some as low as \$6.43 per hour. Only one county, San Francisco, paid a stipend rate that would be above the California minimum wage. *See* Ex. "C."

C. The Rov's Number of Required New Employees Appears to Be Inflated.

It is unclear where or how the ROV derived its figures for the numbers of new employees required for a transition to manual counting. A more thorough financial breakdown of these numbers and the reasons supporting them (e.g. estimates of how long it takes a given number of workers to count a given number of votes) would be helpful to this end. However, a projection based on the number of votes cast in the past three County elections, assuming a very conservative count rate of fifty (50) ballots per hour by teams of four, yields a required number of employees *much* lower than that provided by the ROV. Linda Rantz from Cause of America has been kind enough to do a more detailed analysis of these projections, and her report is attached hereto for your reference as EXHIBIT "D."

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³See the information provided at <https://www.sos.ca.gov/elections/poll-worker-information>. It is worth noting that this information pertains to high school poll workers, but the California Elections Code does not contain any provisions treating compensation of high school workers differently from other poll workers.

Conclusion

In light of these considerations, the costs associated with switching to manual counting is likely substantially lower than has previously been projected and should be reevaluated.

Very truly yours,

LEX REX INSTITUTE

By: 

Alexander H. Haberbush, Esq.

EXHIBIT “5”



Elections – Manual Tally Implementation Increased Costs

- Annual
- One Time
- Costs Per Election (Primary and Presidential)
- Unknown Costs
- Next Steps – New Positions



Increased Annual Costs

Elections		
	Full Time Staff	437,208
	Operating Expenses	15,023
	Hart Maintenance Fees	70,000
	Remote Access VBM	15,000
	Dominion Lease	(262,321)
Support Services		
	Full Time Staff	163,754
	Operating Expenses	6,864
Total Increased Annual Costs		\$ 445,528



Increased One Time Costs

Auditor-Controller/IT		
	Finance System Initial Set Up	19,000
Elections		
	Hiring Expenses	824
	Hart Equipment	801,543
	Return Dominion Equipment	78,000
Support Services		
	Hiring Expenses	539
	Furniture and Supplies	14,240
Total One Time Costs		\$ 914,146



Increased Costs Per Election - Primary

		Stipend	Minimum Wage
Auditor-Controller			
	New Employee Set Up - Overtime	7,532	7,532
	Payment Processing - Overtime	450	450
Elections			
	Counting Supervisors (18)	62,364	62,364
	Precinct Board Members (576)	397,442	490,054
	Hiring Expenses	42,185	42,185
	Building Rental	54,000	54,000
Total Increased Primary Election County Costs		\$ 563,973	\$ 656,585
Reimbursement from Outside Agencies			
	Increased Reimbursement	(226,134)	(268,361)
Total Increased Primary Election Net County Costs		\$ 337,840	\$ 388,224



Increased Costs Per Election - Presidential

		Stipend	Minimum Wage
Auditor-Controller			
	New Employee Set Up - Overtime	20,085	20,085
	Payment Processing - Overtime	1,201	1,201
Elections			
	Counting Supervisors (48)	166,303	166,303
	Precinct Board Members (1,536)	1,019,886	1,301,728
	Hiring Expenses	112,493	112,493
	Hiring Expenses - Adj for returning workers	(21,092)	(21,092)
	Building Rental	108,000	108,000
Total Increased Presidential Election County Costs		\$ 1,406,875	\$ 1,688,717
Reimbursement from Outside Agencies			
	Increased Reimbursement	(602,752)	(738,968)
Total Increased Presidential Election Net County Costs		\$ 804,124	\$ 949,749



Total Increased Costs through FY 24/25

		Stipend	Minimum Wage
Annual			
	Elections	549,819	549,819
	Support Services	341,236	341,236
One Time			
	Auditor-Controller/IT	19,000	19,000
	Elections	880,367	880,367
	Support Services	14,779	14,779
Actual Election Costs			
	Primary Election	563,973	656,585
	Presidential Election	1,406,875	1,688,717
Total Increased County Costs		\$ 3,776,050	\$ 4,150,503
Reimbursement from Outside Agencies			
	Increased Reimbursement	(828,885)	(1,007,329)
Total Increased Net County Cost		\$ 2,947,165	\$ 3,143,175



Additional Unknowns

- Building
 - Purchase & Renovation
 - Maintenance & Utility Increases
- Recruitment Costs
- Cameras, tables, other supplies
- Security for each Election
- Set up and tear down for each Election
- Using County Staff
 - Stipends
 - Decreased outside revenue
 - Reduced hiring costs



Additional Unknowns

- Increased Insurances for Extra Help Staff (i.e. Worker's Comp, Liability)
- Unemployment for Extra Help between Elections
- Increased Cost Plan Charges to Elections (reduced billing to other budgets)
- Special Elections
- Cost to other agencies will increase substantially increase
- Other Unknowns



Next Steps – Hiring Full Time Staff

- Position Requests
 - Elections
 - 3 FTE Clerk/Elections Specialist I/II/III (Sunset 6/30/2025)
 - 1 Clerk Elections Supervisor (Sunset 6/30/2025)
 - 1 Supervising Staff Services Analyst
 - Support Services
 - 2 Personnel Assistant I/II (Sunset 6/30/2025)



Questions

EXHIBIT “6”

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March 31, 2023

Honorable Kevin Crye
Honorable Tim Garman
Honorable Mary Rickert
Honorable Patrick Jones, Chair
Honorable Chris Kelstrom

Re: Legal Errors and Distortions of Law from ROV's Letter Dated March 27, 2023

All:

I am an attorney working with the Lex Rex Institute, a nonprofit organization dedicated to government accountability and operation within Constitutional limitations. Shortly before a March 28 meeting of the Shasta County Board of Supervisors (the "Board"), the Board was presented with a memorandum from Cathy Darling Allen, County Clerk/Registrar of Voters (the "ROV") putting forward various arguments against adopting a manual ballot counting system for elections in Shasta County (the "Memorandum"). At numerous points, the Memorandum offered misleading or otherwise dubious interpretations of the California Elections Code (the "Code") and relied on several doubtful lines of argumentation. While the general tenor of the Memorandum was clearly intended to discourage paper balloting and manual counting, it contained remarkably few legal representations. During the March 28, 2023 meeting of the Board, I publicly commented on several of these legal representations, and I intend this letter to serve as a supplement to those comments.¹ It is not this letter's purpose to

¹During the March 28 Board meeting, a question was raised about my presence. I would like to provide a clear explanation to address any potential concerns. On the afternoon of March 27, 2023, I attended a brief Zoom meeting with a group of concerned citizens, who informed me that the Board had questions about California election law and could benefit from the insights of someone knowledgeable on the topic.

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refute all contentions and implications in the Memorandum, but merely to correct and clarify the mistaken points of law and/or legal distortions of the Code.

1. Page 2 of the Memorandum cites Cal. Elec. Code §12310 and §15103 to support the claim that all vote counters in an election conducted by paper ballot “cannot be volunteers but must be paid county staff.” A plain reading of the Memorandum would lead a reasonable person to conclude that vote counters must be salaried county employees, but, in fact, the Code imposes no such requirement: “Each member of a precinct board shall receive a stipend for services fixed by the governing body of the jurisdiction.” Cal. Elec. Code §12310. Further, “[t]he elections official shall pay a reasonable compensation to each member of the canvassing board of vote by mail ballots.” Cal. Elec. Code §15103. It is not at all clear that the Code in these sections is imposing a requirement that vote counters be paid. Rather, the Code is simply specifying the party responsible for issuing such payment if and when it is made. While this section of the Code remains legally untested at this time, even if the Court were to construe this section as imposing a requirement that vote counters be given money compensation, these sections of the Code are perfectly compatible with the giving of token cash compensation to volunteers. It does not suggest counters are required to be County employees.

2. Page 2 of the Memorandum claims that “section 15101 prohibits an election official from processing vote by mail ballots any earlier than 5 PM the day prior to election day. By contrast, a jurisdiction using a voting system can begin processing vote by mail ballots 29 days before the election.” Here, the Memorandum offers a self-serving interpretation of an ambiguous section of the Code. Cal. Elec. Code §15101 reads:

(a) Any jurisdiction in which vote by mail ballots are cast may begin to process vote by mail ballot return envelopes beginning 29 days before the election. Processing vote by mail ballot return envelopes may include verifying the voter's signature on the vote by mail ballot return envelope and updating voter history records.

(b) Any jurisdiction having the necessary computer capability may start to process vote by mail ballots on the seventh business day prior to the election. Processing vote by mail ballots includes opening vote by mail ballot return envelopes, removing ballots, duplicating any damaged ballots, and preparing the ballots to be machine read, or machine reading them, but under no circumstances may a vote count be

These citizens specifically requested my attendance at the Board meeting. Kevin Crye was present at the March 27 Zoom meeting, and this was the first time I had ever interacted with him in any capacity. No other Board members were present and, apart from the questions asked during the March 28 meeting, I have never spoken with any other member of the Board. My participation in the Board meeting was not a direct invitation from the Board itself, but rather, I attended as a knowledgeable member of the public, responding to the general invitation for public comment. I hope this puts to rest any misunderstandings.

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accessed or released until 8 p.m. on the day of the election. All other jurisdictions shall start to process vote by mail ballots at 5 p.m. on the day before the election.

The term “necessary computer capability” is not defined in the Code, nor is it the term the Code ordinarily uses to designate an electronic voting system, which would be “voting system” (the same term used for non-electronic systems)² The Memorandum has thus imposed a strict interpretation on an ambiguous section of the code in such a way as to appear maximally favorable to the use of electronic voting systems.

3. Page 11 of the Memorandum refers to a test of hand-counting of ballots performed following a 2022 election and claims “the only variances discovered in the process were both caused by human error.” However, this claim is footnoted, and the footnote reads: “In one case the hand-counter missed a voter’s choice in a ‘vote for two’ contest, and in the second instance, a voter marked a write-in space, then listed a qualified candidate, and voted for the candidate. These marks caused the software to identify the ballot as requiring adjudication and it was not adjudicated correctly.” The Memorandum is misleading in classifying the second instance as “caused by human error”: as acknowledged by the Memorandum, the miscount of the second ballot was caused in part by limitations of the electronic system. As described in the Memorandum, human error was involved, but it was not the exclusive cause of the miscount and would not have been prevented by the use of electronic voting systems, which were already in use in that case.

4. Page 14 of the Memorandum cites the development and implementation of procedures to guarantee voter confidentiality and ballot secrecy as a drawback of a manual counting system. Any and all systems for counting votes must account for confidentiality and secrecy. Implying that such procedures are a unique burden on manual ballot counts is misleading at best.

5. Page 15 of the Memorandum repeats the dubious interpretation of Cal. Elec. Code §12310 and §15103 cited in Part (1) above and implies that the need to perform background checks and implement security measures to accommodate the staff required for a manual ballot count is a unique burden of paper ballot systems. However, electronic voting systems equally require information technology security measures and security measures pertaining to any personnel installing or servicing electronic voting systems. Moreover, the fewer individuals who have access to critical voting infrastructure, the greater the capacity of any given individual to cause harm to the system. The necessity of performing background checks on a greater number of individuals to facilitate a manual vote count

²“Voting system” means “any mechanical, electromechanical, or electronic system and its software, or any combination of these used to cast or tabulate votes, or both.” Cal. Elec. Code §362.

March 31, 2023

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6. Similarly, page 17 of the Memorandum cites the requirement to perform a proof-of-concept test on any manual vote counting system as a drawback of a hand-counting system, even while acknowledging that such tests are also required for electronic systems. There is no reason to single out manual count systems in this regard.

7. Page 18 of the Memorandum repeats the self-serving interpretation of Cal. Elec. Code §15101 noted in part (2) above. Again, this section of the Code is ambiguous, and the Memorandum offers a reading biased against manual vote counting systems.

8. Throughout the Memorandum, an implicit argument is made that electronic voting systems should be favored because a final vote count can be produced more quickly. The Memorandum makes repeated reference to Cal. Elec. Code §15372, which requires final counts to be submitted within twenty eight (28) days of an election. However, the Memorandum offers no evidence to suggest that a manual count could not be completed well within the 28-day limit, and there is no reason to believe so.

9. The Memorandum makes repeated reference to the number of registered voters in Shasta County, implicitly suggesting that, at approximately 115,000 voters, a manual ballot count would be too difficult to administer. As can be seen in a 2020 report (accessible at <https://elections.cdn.sos.ca.gov/lor/15day-gen-2020/county.pdf>), Shasta County's 115,000 or so registered voters is by no means unusually high among California counties. A handful of counties have registration below 100,000, but a great many have registration several times higher than Shasta County's. Moreover, and perhaps most importantly of all, the benefits of a manual ballot count are not to be found in greater speed or efficiency, and no reasonable person would suggest so. Manual ballot counts remain the most effective measure to ensure election security, and on that basis alone they are to be strongly recommended.

Very truly yours,

LEX REX INSTITUTE

By: 
Alexander H. Haberbusch, Esq.

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EXHIBIT “7”

1 **Volunteer and Stipend Information from California Counties**

2 **Alameda County, CA**

3 An employee by the name of Jeff responded that the county does allow unpaid volunteer election workers.

4 **Alpine County, CA**

5 An unknown employee responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its staff employees an hourly rate of \$63 for 13 hours of work.

6 **Amador County, CA**

7 An employee by the name of Shaughnessy responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees an hourly rate of \$17.26 for 94 hours of work.

9 **Butte County, CA**

10 An employee by the name of Lea responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees an hourly rate of \$16 for 40 hours of work.

11 **Calaveras County, CA**

12 An employee by the name of Joy responded that the county does allow unpaid volunteer election workers.

13 **Colusa County, CA**

14 An employee by the name of Marissa responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees a stipend of \$120 for 14 hours of work.

16 **Contra Costa County, CA**

17 An unknown employee responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees a stipend of \$125 for 14 hours of work.

18 **Del Norte County, CA**

19 An employee by the name of Bernadette responded that the county does allow unpaid volunteer election workers.

20 **El Dorado County, CA**

21 An employee by the name of Daniel responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees a stipend of \$110 a day for 4-22 11 days of work.

23 **Fresno County, CA**

24 An employee by the name of Shelby responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees an hourly rate of \$15 for 4-11 days of work.

25 **Glenn County, CA**

26 An employee by the name of Eileen responded that the county does not accept unpaid volunteers. The employee further responded that the county pays its employees a stipend of \$135 for 1 day of work.

- 1 **Humboldt County, CA**
An employee by the name of [Name] responded that the county does not accept unpaid volunteers.
2 The employee further responded that the county pays its employees a stipend of \$131 for training
and 1 day of work.
- 3 **Imperial County, CA**
4 An employee by the name of Josey responded that the county does not accept unpaid volunteers.
The employee further responded that the county pays its employees a stipend of \$115 for training
5 and 1 day of work.
- 6 **Inyo County, CA**
7 An employee by the name of Danielle responded that the county does allow unpaid volunteer
election workers.
- 8 **Kern County, CA**
9 An employee by the name of Solaria responded that the county does not accept unpaid volunteers.
The employee further responded that the county pays its employees a stipend of \$160 for 1 day of
work.
- 10 **Kings County, CA**
11 An employee by the name of Paula responded that the county does not accept unpaid volunteers.
The employee further responded that the county pays its employees a stipend of \$150 a day for 4-
12 10 days of work.
- 13 **Lake County, CA**
14 An employee by the name of Savannah responded that the county does not accept unpaid
volunteers. The employee further responded that the county pays its employees a stipend of \$180
for 1 day of work.
- 15 **Lassen County, CA**
16 An employee by the name of Holly responded that the county does allow unpaid volunteer
election workers.
- 17 **Los Angeles County, CA**
18 An employee by the name of Elizabeth responded that the county does not accept unpaid
volunteers. The employee further responded that the county pays its employees a stipend of \$100 a
19 day for 1-4 days of work.
- 20 **Madera County, CA**
21 An employee by the name of Vanessa responded that the county does not accept unpaid
volunteers. The employee further responded that the county pays its employees an hourly rate of
\$16 for 2-3 weeks of work.
- 22 **Marin County, CA**
23 An employee by the name of Tony responded that the county does not accept unpaid volunteers.
The employee further responded that the county pays its employees a stipend of \$100 each day for
24 4 days of work.
- 25 **Mariposa County, CA**
26 An employee by the name of Brian responded that the county does allow unpaid volunteer election
workers.
- 27 **Mendocino County, CA**
The county did not answer.
- 28

- 1 **Merced County, CA**
An unknown employee responded that the county does allow unpaid volunteer election workers.
- 2 **Modoc County, CA**
3 An employee by the name of Stephanie responded that the county does not accept unpaid
4 volunteers. The employee further responded that the county pays its employees a stipend of \$115
for 1 day of work.
- 5 **Mono County, CA**
6 An employee by the name of Queenie responded that the county does not accept unpaid
7 volunteers. The employee further responded that the county pays its employees an hourly rate of
\$8.50 for 13 hours of work.
- 8 **Monterey County, CA**
An employee by the name of Mary responded that the county does allow unpaid volunteer election
workers.
- 9 **Napa County, CA**
10 The county did not answer.
- 11 **Nevada County, CA**
12 An employee by the name of Peggy responded that the county does not accept unpaid volunteers.
13 The employee further responded that the county pays its employees a stipend of \$125 a day for 4-
11 days of work.
- 14 **Orange County, CA**
15 An employee by the name of Lizelle responded that the county does not accept unpaid volunteers.
16 The employee further responded that the county pays its employees an hourly rate of \$15.50 for up
to 11 days of work.
- 17 **Placer County, CA**
18 An employee by the name of Brian responded that the county does not accept unpaid volunteers.
19 The employee further responded that the county pays its employees a stipend of \$125 for 1 day of
work.
- 20 **Plumas County, CA**
21 An employee by the name of Tina responded that the county does not accept unpaid volunteers.
22 The employee further responded that the county pays its employees an hourly rate of \$15.50 for 1-
2 days of work.
- 23 **Riverside County, CA**
24 An employee by the name of Traylin responded that the county does not accept unpaid volunteers.
25 The employee further responded that the county pays its employees an hourly rate of \$20 for 4
days of work.
- 26 **Sacramento County, CA**
27 The county did not answer.
- 28 **San Benito County, CA**
An employee by the name of Cheyanne responded that the county does not accept unpaid
volunteers. The employee further responded that the county pays its employees a stipend of \$500,
total, for 4 days of work.

- 1 **San Bernardino County, CA**
An employee by the name of Jessica responded that the county does not accept unpaid volunteers.
2 The employee further responded that the county pays its employees a stipend of \$120 for 2 hours
of training and 1 day of work.
- 3 **San Diego County, CA**
4 The county did not answer.
- 5 **San Joaquin County, CA**
An employee by the name of Deedee responded that the county does allow unpaid volunteer
6 election workers.
- 7 **San Luis Obispo County, CA**
An employee by the name of Milan responded that the county does not accept unpaid volunteers.
8 The employee further responded that the county pays its employees a stipend of \$110 for training
and 1 day of work.
- 9 **San Mateo County, CA**
10 The county did not answer.
- 11 **Santa Barbara County, CA**
The county did not answer.
- 12 **Santa Clara County, CA**
13 An unknown employee responded that the county does not accept unpaid volunteers. The
employee further responded that the county pays its employees a stipend of \$145 a day for 2 days
14 of work.
- 15 **Santa Cruz County, CA**
An employee by the name of Stacey responded that the county does allow unpaid volunteer
16 election workers.
- 17 **Sierra County, CA**
An employee by the name of Tia responded that the county does not accept unpaid volunteers. The
18 employee further responded that the county pays its employees an hourly rate of \$15.50 for 1 day
of work.
- 19 **Siskiyou County, CA**
20 An employee by the name of Melissa responded that the county does allow unpaid volunteer
election workers.
- 21 **Solano County, CA**
22 An employee by the name of Laura responded that the county does allow unpaid volunteer
election workers.
- 23 **Sonoma County, CA**
24 An unknown employee responded that the county does allow unpaid volunteer election workers.
- 25 **Stanislaus County, CA**
The county did not answer.
- 26 **Sutter County, CA**
27 The county did not answer.
- 28

- 1 **Tehama County, CA**
The county did not answer.
- 2
- 3 **The City and County of San Francisco, CA**
An employee by the name of Teddy responded that the county does not accept unpaid volunteers.
The employee further responded that the county pays its employees a stipend of \$225 for 1 day of
4 work.
- 5 **Trinity County, CA**
The county did not answer.
- 6
- 7 **Tulare County, CA**
The county did not answer.
- 8 **Tuolumne County, CA**
The county did not answer.
- 9
- 10 **Ventura County, CA**
An unknown employee responded that the county does allow unpaid volunteer election workers.
- 11 **Yolo County, CA**
The county did not answer.
- 12
- 13 **Yuba County, CA**
An employee by the name of Carrie responded that the county does allow unpaid volunteer
election workers.

14 I certify, to the best of my knowledge, that the foregoing accurately reflects the statements made to
15 me by representatives of the County Clerk/Registrar of Voters for each county specified above,
16 respectively. If I were called as a witness, I would and could competently testify to the foregoing
facts, under penalty of perjury.

17
18 4/28/23



 Kristin Jones
 Declarant

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22
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26
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EXHIBIT “8”

Shasta County, CA

HAND COUNT LABOR COST ESTIMATES

Voting Methods in Shasta

- Election Day (Polling Places)
- Vote By Mail
- All Mail
- Early Vote

Ballots Cast

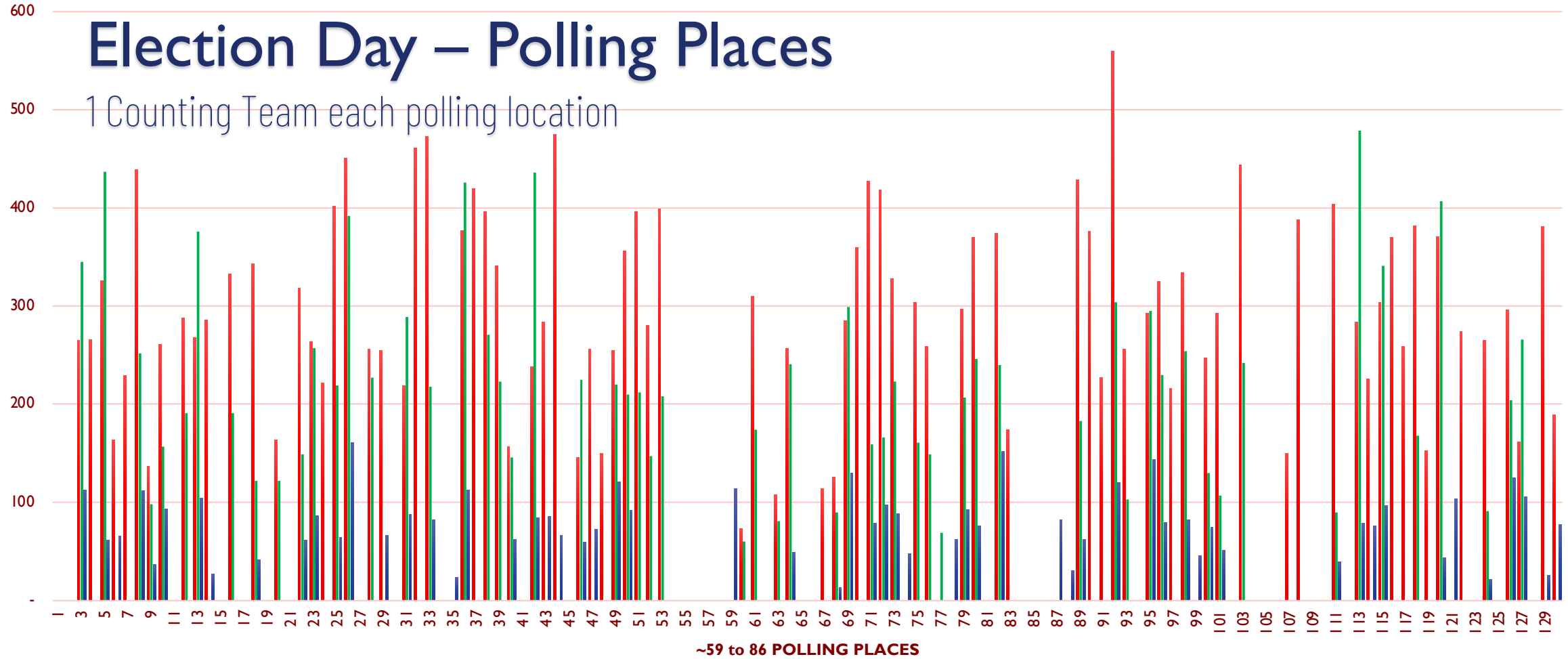
Election	Election Day	Vote by Mail	All Mail	Early Vote	TOTAL
Nov 8 2016	25,459	53,002	3,965	0	84,426
Nov 3 2020	13,225	66,808	5,033	8,929	93,995
Jun 7 2022	4,635	44,774	548	2,136	52,093

SHASTA COUNTY, CA ~112K Registered Voters

Election Day – Polling Places

1 Counting Team each polling location

BALLOTS CAST PER POLLING PLACE



■ Nov 8 2016 (86 polling places; avg 6 hrs hand count each location) ■ Nov 3, 2020 (60 polling places; avg 5 hrs hand count each location) ■ June 7 2022 (59 polling places; 2 hrs hand count each location)



Election Day: Labor Cost Estimates

Election	Ballots Cast	# Polling Places (PP)	# Counters Needed ¹	Avg Ballots per PP	Avg Hrs to Count per PP ²	Labor cost per Team ³	Labor Estimate
Nov 8 2016	25,459	86	344	296	6	\$ 360	\$ 30,960
Nov 3 2020	13,225	60	240	220	4	\$ 300	\$ 18,000
Jun 7 2022	4,635	59	236	79	2	\$ 120	\$ 7,080

1. Based on teams comprised of 4 counting judges at each polling location
2. Calculated on most conservative estimate of 50 ballots per hour per team. Depending on election, it could increase to as high as 100 ballots per hour per team and reduce costs.
3. Using \$15 hourly rate. County employees can serve as election/counting judges. The estimate would be reduced by employee involvement.

Vote by Mail: Labor Cost Estimates

Election	Ballots Cast	# 8-hour shifts ¹	# Counters Needed for 1-day results ²	# Counters Needed for 2-day results ³	Labor cost per Team/Shift ⁴	Labor Estimate
Nov 8 2016	53,002	133	530	265	\$ 480	\$ 63,602
Nov 3 2020	66,808	167	668	334	\$ 480	\$ 80,170
Jun 7 2022	44,774	112	448	224	\$ 480	\$ 53,729

1. Based on most conservative estimate of 50 ballots per hour. Depending on election, it could increase to as high as 100 ballots per hour and reduce costs.
2. Calculated on teams of 4 counting judges per shift. This number of counting judges could count the entire number of ballots in one 8-hour shift.
3. To reduce the number of counting judges or county employees needed, the ballots could be counted in two 8-hour shifts.
4. Using \$15 hourly rate for 4 counting judges for an 8-hour shift. County employees can serve as election/counting judges. The estimate would be reduced by employee involvement.

All Mail: Labor Cost Estimates

Election	Ballots Cast	# 8-hour shifts ¹	# Counters Needed for 1-day results ²	# Counters Needed for 2-day results ³	Labor cost per Team/Shift ⁴	Labor Estimate
Nov 8 2016	3,965	10	40	20	\$ 480	\$ 4,758
Nov 3 2020	5,033	13	50	25	\$ 480	\$ 6,040
Jun 7 2022	548	1	5	3	\$ 480	\$ 658

1. Based on most conservative estimate of 50 ballots per hour. Depending on election, it could increase to as high as 100 ballots per hour and reduce costs.
2. Calculated on teams of 4 counting judges per shift. This number of counting judges could count the entire number of ballots in one 8-hour shift.
3. To reduce the number of counting judges or county employees needed, the ballots could be counted in two 8-hour shifts.
4. Using \$15 hourly rate for 4 counting judges for an 8-hour shift. County employees can serve as election/counting judges. The estimate would be reduced by employee involvement.

Early Vote: Labor Cost Estimates

Election	Ballots Cast	# 8-hour shifts ¹	# Counters Needed for 1-day results ²	# Counters Needed for 2-day results ³	Labor cost per Team/Shift ⁴	Labor Estimate
Nov 8 2016	0	0	0	0	0	0
Nov 3 2020	8,929	22	89	45	\$ 480	\$ 10,715
Jun 7 2022	2,136	5	21	11	\$ 480	\$ 2,563

1. Based on most conservative estimate of 50 ballots per hour. Depending on election, it could increase to as high as 100 ballots per hour and reduce costs.
2. Calculated on teams of 4 counting judges per shift. This number of counting judges could count the entire number of ballots in one 8-hour shift.
3. To reduce the number of counting judges or county employees needed, the ballots could be counted in two 8-hour shifts.
4. Using \$15 hourly rate for 4 counting judges for an 8-hour shift. County employees can serve as election/counting judges. The estimate would be reduced by employee involvement.

TOTAL: Labor Cost Estimates

Election	Election Day	Vote by Mail	All Mail	Early Vote	Labor Estimate ¹
Nov 8 2016	\$ 30,960	\$ 63,602	\$ 4,758	0	\$ 99,320
Nov 3 2020	\$ 18,000	\$ 80,170	\$ 6,040	\$ 10,715	\$ 114, 924
Jun 7 2022	\$ 7,080	\$ 53,729	\$ 658	\$ 2,563	\$ 64,030

- Using \$15 hourly rate for 4 counting judges for an 8-hour shift. County employees can serve as election/counting judges. The estimate would be reduced by employee involvement.

One-Day Results: Labor Needs

Election	Election Day	Vote by Mail	All Mail	Early Vote	Labor Needed ¹
Nov 8 2016	344	530	40	0	914
Nov 3 2020	240	668	50	89	1,048
Jun 7 2022	236	448	5	21	711

1. Shasta County has about 112,000 registered voters who could, conceivably, serve as election/counting judges. The highest labor needed in the chart above is 0.9% of all registered voters.

Two-Day Results: Labor Needs

Election	Election Day	Vote by Mail	All Mail	Early Vote	Labor Needed ¹
Nov 8 2016	344	265	20	0	629
Nov 3 2020	240	334	25	45	644
Jun 7 2022	236	224	3	11	473

1. Shasta County has about 112,000 registered voters who could, conceivably, serve as election/counting judges. The highest labor needed in the chart above is 0.6% of all registered voters.