



COUNTY OF LOS ANGELES  
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET  
LOS ANGELES, CALIFORNIA 90012-2713

MARY C. WICKHAM  
County Counsel

April 2, 2020

TELEPHONE  
(213) 443-0461  
FACSIMILE  
(213) 617-7182  
TDD  
(213) 633-0901  
E-MAIL  
EChu@counsel.lacounty.gov

VIA E-MAIL ONLY

Ray Lutz  
Citizens' Oversight Projects  
771 Jamacha Road 148  
El Cajon, California 92019  
[raylutz@citizenoversight.org](mailto:raylutz@citizenoversight.org)

**Re: California Public Records Act Request**

Dear Mr. Lutz:

This is in response to your Public Records Act request, addressed to the Los Angeles County Registrar-Recorder/County Clerk, received on March 22, 2020. You requested the following:

- "1. The complete (or nearly complete) set of ballot images for the March 3 primary election. We accept the format as produced by your election system as further described below. We understand that it may be practical to exclude a small set of ballots for privacy concerns. If so, then please provide the total vote counts for each contest included in the set of ballots that are excluded so we may add this to the total of the other ballots.
2. The set of "cast-vote records" which can be paired up with each ballot image, as your process has determined voter intent. Please include the "style(s)" designator(s) for each record for each sheet, and whether the ballot is from a BMD (ballot marking device) or not.
3. The "voted/non-voted" file, sometimes also called the "poll list" which provides the number of voters who cast a vote from the standpoint of polling place sign-in sheets or e-pollbooks.
4. If available, a file containing the actual text printed as the title and description of each contest if they vary on each style of ballot. Generally, we find that the text is the same for a given contest on all styles except for those based on language differences, but that the text on the ballot differs from the

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official contest name. If this is not a easy to provide export, we can reconstruct this data by examining the ballots.

5. In the future, we hope to also be able to obtain a file containing SHA-256 message digests of each ballot image as originally scanned by the ballot scanner device, especially if such devices are used in the precinct. As we are still working on standards regarding how these are to be produced, we understand if this is not available but if you do have such a file, we would appreciate it.

6. Please also provide the ballot images used in the Logic & Accuracy test, and the corresponding cast-vote records so we can review that as well. As this has no privacy or other concerns, and is not related to the certification cycle, please provide this portion separately and earlier than the rest of the request."

Please be advised that we are extending the time to respond under Government Code section 6253(c), due to unusual circumstances. These include the unprecedented and ongoing COVID 19 pandemic and public health emergency, the need to identify, locate, and collect potentially responsive records, and the need to review any records that may be located to determine if they can be disclosed.

Specifically as to COVID 19, please note that the County is adhering to, and will continue to adhere to all orders issued by federal, State, and local officials, as well as implement guidance from public health officials and authorities. Accordingly, County staff will be focused on providing essential services to County residents. Our office will work with the Los Angeles County Registrar-Recorder/County Clerk as time allows and as quickly as practicable to provide you with a determination as to the identification of public records, if any, that are responsive to your request, and any accompanying production of responsive non-exempt records.

Thank you for your consideration in this matter.

Very truly yours,

MARY C. WICKHAM  
County Counsel

By   
EVA W. CHU  
Deputy County Counsel  
Government Services Division

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