



June 6, 2023

Ventura County Elections Division
c/o Michelle Ascencion
800 S Victoria Ave, Ventura, CA 93003

RE: Election Administration Plan (EAP) Renewal September 2023 | Public Comments

Thank you for accepting this document into the public record. Our Ventura County community organization has been involved in many elections as precinct volunteers helping other citizens understand how to vote and ensuring every vote is processed legally and without hesitation. We have gathered together and reviewed the EAP renewal and offer our respectful input to you as the head of the department.

Our comments are broken in two parts. The first argues that the plan as presented should be shelved and the time for public comments extended. The second portion addresses the fundamental need for an Election Administration Plan that only marginally resembles the one under consideration.

SHELVING THE PLAN | EXTENDING PUBLIC COMMENTS

EAP REVISION 5-22-23 AS WRITTEN SHOULD BE SHELVED.

"Reading is the most fundamental skill children must learn to succeed in school and in life. But today, half of California's students do not read at grade level. What's worse, among low-income students of color, over 65% read below grade level. Few ever catch up." - [California Reading Coalition](#)

- The readability score for the EAP falls into three categories. The categories are "fairly difficult to read", "difficult to read", and "very difficult to read". The entire EAP requires a college-level understanding of the written word.
- The Flesch Kincaid Readability Test was used to assess the Election Administration Plan. The Flesch Kincaid Readability Test has been used widely by education professionals and others since 1948 as an objective measure of a written work.
- The Election Administration Plan's grade level score is 12.3. Text intended for readership by the general public should aim for a grade level of around 8 or lower. This Election Administration Plan is 4.3 points higher making the concepts out of reach for the average voter.
<https://readable.com/readability/flesch-reading-ease-flesch-kincaid-grade-level/>
- The EAP's reading ease score is 36. It is far beyond the grasp of the general public. To reach the greatest number of voters, the score should be at least 60 or more.
- The California Reading Coalition has ranked 285 school districts, 10 are in Ventura County. The highest rank of any of the 10 Ventura school districts is only 69. Four of the districts fall within the 100s and two, Fillmore Unified and Hueneme Elementary are near the bottom at 248 and 272 respectively.
<https://www.careads.org/curric-county-report>

THE TIME ALLOWED FOR PUBLIC COMMENTS SHOULD BE EXTENDED.

"This new Draft EAP is available and provided to the public who is invited to comment throughout the process and also during set 14-Day comment periods." - [Ventura County Elections Division](#)

- The Elections Division in accordance with the Voter's Choice Act Senate Bill 450 has "provided to the public" a document most voters cannot read.

- People working full-time and getting paid have written this Plan. It is written at a reading level beyond the reach of most adults. Expecting the average voter to comprehend this document and respond to it is an impossibility.
- The Elections Division should pull this revision and return to basics if it is to meet the standard the Elections Division has set for itself.

RECOMMENDED ELECTION ADMINISTRATION PLAN

"The true reason of requiring any qualification, with regard to property, in voters, is to exclude such persons as are in so mean a situation that they are esteemed to have no will of their own. If these persons had votes, they would be tempted to dispose of them under some undue influence or other. This would give a great, an artful, or a wealthy man, a larger share in elections than is consistent with general liberty." - William Blackstone, 1700s English Jurist

The process for delivering our voice via our vote must be secure, transparent, and, like the Flesch Kincaid test, accessible to most voters. The framers of our country's governing documents recognized the primacy of the public's voice in creating a government for the people and by the people and answerable to the people.

"...It is, Sir, the people's Constitution, the people's Government, made for the people, made by the people, and answerable to the people. The people of the United States have declared that this Constitution shall be the supreme law. We must either admit the proposition or dispute their authority." -Senator Daniel Webster, 1830

Elections in Ventura County must be returned "to the people" by using the algorithm P3(H)=CIEO, People-Precincts-Paper (Hand-counted) = Confidence In Election Outcomes. Men and women interested in voting will make the time to do so.

Voting should never be made so easy as returning a prepaid postcard reserving one's place for dinner to hear a broker's sales pitch! Our ballots should never be consigned to dozens of strangers' hands, dependent on equipment most voters cannot operate, using software that requires a highly specialized skill set few men and women have.

I (we) look forward to hearing from you about this most important and sacred process.

With Appreciation,

Tim McCarthy
 Director, Move The Needle
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CC: Supervisors Matt LaVere, Jeff Gorell, Kelly Long, Janice Parvin, Vianey Lopez

OVERALL AVERAGES

36.7

10.6

1.7

9.4

1.9

613

5,363

EAP - Election Administration Plan

Reading and Comprehension Scores Using a Flesch-Kincaid Calculator

Section	Grade Level	Reading Ease	Reading Level	Reading Level Score	Average Words per Sentence	Average Syllables per Word	Sentences	Words
Addressing Disparities in Participation	12.3	21.2	Very Difficult	3	7.9	2.1	36	283
Advisory Committees	17.5	0	Very Difficult	3	6.1	2.6	16	97
Ballot Drop Boxes	7.9	48.8	Difficult	1	5.7	1.8	49	279
Budget	10.5	36.6	Difficult	1	9.4	1.9	16	150
Community Partners	12	21.8	Very Difficult	3	7.3	2.1	25	183
Direct Voter Contacts	8.5	52.5	Fairly Difficult	2	10.4	1.7	16	167
High Schools & Higher Ed	13.1	19	Very Difficult	3	10	2.1	3	30
Individual Voter Network	9	45.9	Difficult	1	8.5	1.8	14	119
Overview	13.7	39.1	Difficult	1	23.6	1.7	13	307
Overview: Ed & Outreach	9.3	39.6	Difficult	1	6.4	1.9	32	206
Preventative Measures	9.7	38.7	Difficult	1	7.3	1.9	20	146
Preventative Measures	9	45.7	Difficult	1	8.7	1.8	46	402
Public Service Announcements & Media	9.2	45.2	Difficult	1	9.2	1.8	18	165
Vote By Mail	7.4	55.3	Fairly Difficult	2	7.6	1.7	66	503
Vote Centers	11.4	45	Difficult	1	17.7	1.7	45	798
Voter Services	9.8	38.5	Difficult	1	7.5	1.9	93	698
Voters with Disabilities	10	38	Difficult	1	8	1.9	75	597
Voting Technology	11.1	29.7	Very Difficult	3	7.8	2	30	233

Results: OVERVIEW

Flesh-Kincaid Grade Level: 13.7

Flesch Reading Ease Score: 39.1

Reading Level: College (Difficult to read)

Average Words per Sentence: 23.6

Average Syllables per Word: 1.7

Sentences: 13

Words: 307

Results: VOTE BY MAIL

Flesh-Kincaid Grade Level: 7.4

Flesch Reading Ease Score: 55.3

Reading Level: 10th to 12th grade (Fairly difficult to read)

Average Words per Sentence: 7.6

Average Syllables per Word: 1.7

Sentences: 66

Words: 503

Results: BALLOT DROP BOXES

Flesh-Kincaid Grade Level: 7.9

Flesch Reading Ease Score: 48.8

Reading Level: College (Difficult to read)

Average Words per Sentence: 5.7

Average Syllables per Word: 1.8

Sentences: 49

Words: 279

Results: VOTE CENTERS

Flesh-Kincaid Grade Level: 11.4

Flesch Reading Ease Score: 45

Reading Level: College (Difficult to read)

Average Words per Sentence: 17.7

Average Syllables per Word: 1.7

Sentences: 45

Words: 798

Results: VOTING TECHNOLOGY

Flesh-Kincaid Grade Level: 11.1

Flesch Reading Ease Score: 29.7

Reading Level: College graduate (Very difficult to read)

Average Words per Sentence: 7.8

Average Syllables per Word: 2

Sentences: 30

Words: 233

Results: BUDGET

Flesh-Kincaid Grade Level: 10.5
Flesch Reading Ease Score: 36.6
Reading Level: College (Difficult to read)
Average Words per Sentence: 9.4
Average Syllables per Word: 1.9
Sentences: 16
Words: 150

Results: PREVENTATIVE MEASURES

Flesh-Kincaid Grade Level: 9.7
Flesch Reading Ease Score: 38.7
Reading Level: College (Difficult to read)
Average Words per Sentence: 7.3
Average Syllables per Word: 1.9
Sentences: 20
Words: 146

Results: OVERVIEW-VOTER EDUCATION AND OUTREACH PLAN

Flesh-Kincaid Grade Level: 9.3
Flesch Reading Ease Score: 39.6
Reading Level: College (Difficult to read)
Average Words per Sentence: 6.4
Average Syllables per Word: 1.9
Sentences: 32
Words: 206

Results: COMMUNITY PARTNERS

Flesh-Kincaid Grade Level: 12
Flesch Reading Ease Score: 21.8
Reading Level: College graduate (Very difficult to read)
Average Words per Sentence: 7.3
Average Syllables per Word: 2.1
Sentences: 25
Words: 183

Results: HIGH SCHOOLS AND HIGHER EDUCATION

Flesh-Kincaid Grade Level: 13.1
Flesch Reading Ease Score: 19
Reading Level: College graduate (Very difficult to read)
Average Words per Sentence: 10
Average Syllables per Word: 2.1
Sentences: 3
Words: 30

Results: INDIVIDUAL VOTER NETWORK

Flesh-Kincaid Grade Level: 9
Flesch Reading Ease Score: 45.9
Reading Level: College (Difficult to read)
Average Words per Sentence: 8.5
Average Syllables per Word: 1.8
Sentences: 14
Words: 119

Results: DIRECT VOTER CONTACTS

Flesh-Kincaid Grade Level: 8.5
Flesch Reading Ease Score: 52.5
Reading Level: 10th to 12th grade (Fairly difficult to read)
Average Words per Sentence: 10.4
Average Syllables per Word: 1.7
Sentences: 16
Words: 167

Results: ADVISORY COMMITTEES

Flesh-Kincaid Grade Level: 17.5
Flesch Reading Ease Score: 0
Reading Level: College graduate (Very difficult to read)
Average Words per Sentence: 6.1
Average Syllables per Word: 2.6
Sentences: 16
Words: 97

Results: PUBLIC SERVICE ANNOUNCEMENTS & MEDIA

Flesh-Kincaid Grade Level: 9.2
Flesch Reading Ease Score: 45.2
Reading Level: College (Difficult to read)
Average Words per Sentence: 9.2
Average Syllables per Word: 1.8
Sentences: 18
Words: 165

Results: VOTER SERVICES

Flesh-Kincaid Grade Level: 9.8
Flesch Reading Ease Score: 38.5
Reading Level: College (Difficult to read)
Average Words per Sentence: 7.5
Average Syllables per Word: 1.9
Sentences: 93
Words: 698

Results: VOTERS WITH DISABILITIES

Flesh-Kincaid Grade Level: 10

Flesch Reading Ease Score: 38

Reading Level: College (Difficult to read)

Average Words per Sentence: 8

Average Syllables per Word: 1.9

Sentences: 75

Words: 597

Results: ADDRESSING DISPARITIES IN PARTICIPTION

Flesh-Kincaid Grade Level: 12.3

Flesch Reading Ease Score: 21.2

Reading Level: College graduate (Very difficult to read)

Average Words per Sentence: 7.9

Average Syllables per Word: 2.1

Sentences: 36

Words: 283

Results: Appendix D, Preventative Measures

Flesh-Kincaid Grade Level: 9

Flesch Reading Ease Score: 45.7

Reading Level: College (Difficult to read)

Average Words per Sentence: 8.7

Average Syllables per Word: 1.8

Sentences: 46

Words: 402

Debra Babes #53

only vaguely, that in some unfathomable way their vote counts for little or nothing.

There have been too many odd coincidences and peculiar results over the past quarter century, and the decline in voter participation in national elections over the past two decades is directly proportional to the rise of computerized voting.

The people are naive about computer voting and somewhat less than entirely computer literate. They do intuit, however, that it is a mistake to put much faith in the integrity of computerized voting systems. Except in matters spiritual, intelligent people tend not to place much faith in what they cannot see. They could see paper ballots marked and placed into a slot in ballot boxes, and except for certain infamous precincts in Chicago, people generally trusted the American voting process. They could see it, touch it, and their vote left a paper trail that could be followed if there was a need for verification. That can no longer be said.

The instant after a voter chooses his or her ballot selection on a computer, the electronic impulse that is triggered either records that vote or it does not. Either way, the computer program immediately erases all record of the transaction except for the result, which is subject to an infinite variety of switching, column jumping, multiplication, division, subtraction, addition and erasure.

All these operations take place in the electronic universe within the computer and are entirely under the direction of the program or "source code." It is impossible to go back to the original event, like you can with a paper ballot, and start over again in case fraud is suspected. With computer voting the results are virtually final, and, in all cases, hatched in the electronic dark. No human eye can watch or protect your vote once it is cast in a computer voting machine.

People who mistrust the voting process cannot, in the traditional American way, accept the defeat of their candidates gracefully and work loyally with the winners. Instead, more and more American voters are feeling "had," "scammed," "hoodwinked" by the voting system. Trust has almost departed. There is the nagging, unproven, yet pervasive feeling that the "experts," the "spin doctors," the "covert operators" and the "private interests" have put their technicians and consultants in absolute control of the national vote count, and that in any selected situation these computer wizards can and will program the vote as their masters wish.

All over the United States of America there are people who listen to the facts about computer voting and then tell horror stories of candidates, who didn't have a prayer before election day, then slip into office by an uncheckable computer vote. Most common is the story of the

YEAR	Election	V-Xret	Reg Voters	Not Returned	%	Voted	%
2023	Mar23OxnSp	(8,819)	11,911	10,332	87%	1,513	13%
2022	Nov22Gen	68,590	482,544	205,794	43%	274,384	57%
2022	Jun22DPrim	(78,940)	468,236	272,571	58%	193,631	41%
2021	Nov21OxnSp	2,091	2,091	0	0%	2,091	100%
2021	2021RECALL	137,176	451,538	155,944	35%	293,120	65%
2020	Nov20PresG	317,583	431,160	56,084	13%	373,667	87%
2020	May20CD25	8,500	59,360	25,089	42%	33,589	57%
2020	Mar20PresP	83,426	325,623	119,958	37%	203,384	62%
2018	Nov18Gen	199,907	312,039	54,646	18%	254,553	82%
2018	Jun18DPrim	29,774	242,616	105,882	44%	135,656	56%
2018	Apr18AS45	(107)	484	295	61%	188	39%
2017	May17OKPrk	(1,387)	6,023	3,690	61%	2,303	38%
2016	Nov16PresG	247,733	300,144	24,033	8%	271,766	91%
2016	Jun16PresP	90,071	229,838	68,121	30%	158,192	69%
2016	Jan26NyAcr	(148)	378	255	67%	107	28%
2015	Nov15UDEL	(57)	306	180	59%	123	40%
2015	Jun15ThOSp	(1,277)	27,122	14,080	52%	12,803	47%
2014	Nov14GubGn	90,065	202,051	54,735	27%	144,800	72%
2014	Jun14GPrim	(9,761)	151,412	79,111	52%	69,350	46%
2013	Nov13AS45	(72)	260	165	63%	93	36%
2013	Nov13UDEL	(1,556)	25,790	13,484	52%	11,928	46%
2013	Sept13AS45	(89)	263	174	66%	85	32%
2013	Aug13Ojai	1,202	2,146	456	21%	1,658	77%
2013	Jun13OxnSp	(8,696)	22,379	15,382	69%	6,686	30%
2012	Nov12PresG	204,476	233,833	13,329	6%	217,805	93%
2012	Jun12PresP	29,859	141,214	54,125	38%	83,984	59%
2011	Nov11UDEL	1,847	22,733	10,213	45%	12,060	53%
2011	Feb11SD17	(1,854)	5,790	3,767	65%	1,913	33%
2010	Nov10Gen	144,363	188,883	21,007	11%	165,370	88%
2010	Jun10GPrim	46,381	134,685	42,470	32%	88,851	66%
2009	Nov09UDEL	0	36,604	15,319	42%	15,319	42%
2009	May19STATE	31,582	120,470	44,119	37%	75,701	63%
2008	Nov08PresG	195,957	208,254	5,519	3%	201,476	97%
2008	Jun08DirPr	27,144	99,479	35,721	36%	62,865	63%

Totals										263	30	189	32	1	10	1	83% of the time, these elected officials did NOT vote in person.
Elected Office	Name	# of Elections	VB/M	VAB	VPP	VC	XVAB	Too Late	Notes about their Voting history.								
Assembly District 38	Bennett, Steve (D)	39	3	31	4	0	1	0	2002: Last time Steve Bennett voted in person.								
Assembly District 42	Irwin, Jacqui (D)	33	3	29	1	0	0	0	2002: The only time Jacqui Irwin voted in person.								
BOS-District 1	LaVere, Matt (D)	21	3	13	3	0	2	0	2000, 2008, & 20016: Matt LaVere voted in person. (4 elections an N-P)								
BOS-District 2	Gorell, Jeff (R)	26	4	19	3	0	0	0	2004: Last time Jeff Gorell voted in person.								
BOS-District 3	Long, Kelly (R)	18	3	7	5	0	3	0	2012, 2014, 2016: Kelly Long voted in person.								
BOS-District 4	Parvin, Janice (R)	35	3	27	5	0	0	0	2004: Last time Janice Parvin voted in person.								
BOS-District 5	Lopez, Vianey (D)	20	3	12	0	0	4	1	Vianey Lopez has no record of voting in person in Ventura.								
Congress 26th District	Brownley, Julia (D)	14	3	11	0	0	0	0	Julia Brownley has no record of voting in person in Ventura.								
ROV as of Jun 2022	Ascencion, Michelle (NPP)	28	3	15	10	0	0	0	2008: Last time Michelle Ascencion voted in person								
ROV, Retired	Lunn, Mark (R)	29	2	25	1	1	0	0	2000 & 2022: Voted at a polling place in 2000 and a Vote Center Jun 2022.								

KEY to Abbreviations

- VB/M Voted by Mail Ballot
- VAB Voted by Absentee Ballot
- VPP Voted at Polling Place
- VC Vote Center
- XVAB Absentee Issued but not Returned
- Too Late Challenged - Too Late

