

From: [Pam Bacon](#)
To: [SoS Rulemaking](#)
Subject: [EXTERNAL] Election Rule Hearing Comments Aug 15, 2024
Date: Friday, August 9, 2024 12:27:24 PM
Attachments: [image001.png](#)
Importance: High

August 9, 2024

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To whom it may concern:

I am writing in opposition to the following proposed election rules for the following reasons:

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RULE 20.7.2 (d)

This proposed rule is unrealistic for the following reasons without special modifications to drop boxes for a wire seal and even then, there are issues:

1. In the wintertime there are times when we must use a deicer to get the door open as the door has frozen shut. A flat sticky seal is NOT going to stay on the frozen outside box door.
2. In the summertime the seal will not stay on as it will adhere on any south/west or south/east facing areas when temperatures are 90 to 104 degrees not the temperature of the metal box (metal box temperature will be higher).
3. This rule will hurt public confidence and perception if the seal is falling off. If it is a flat sticky seal, then the VOID will show and again this will not instill any public confidence in the process.
4. There will inevitably be someone who walking by will remove the seal just because they can and will cause additional unjustified questions or concerns.
5. Judges (average age 70-80) standing outside in a blizzard, rainstorm or 80 mile an hour wind struggling to fill out logs and wiping off box doors to attempt to get a seal to adhere.
6. This rule is unnecessary; counties control who has access to the keys, the drop box and where the keys are located.

RULE 20.11 (F)

1. Sunday before election day – this is an unfunded mandate for this part of the rule to pay staff on a Sunday to verify the cameras are operational.
2. Sunday there would not be any IT staff available to fix the problem or any other person to fix the problem.
3. This rule is very excessive.

RULE 25-2-2 (b)(1)

The part “UNLESS given permission by the Department of State, the audit board MUST not consist of county Clerk staff or individuals who participated in the ballot resolution or duplication. “

1. Word you “ MUST” ties the hands of smaller counties who might realistically have only one or two judges that are comfortable running a computer. Those people are usually the adjudication station judge who runs that computer.
2. What makes the difference if they were adjudication or duplication judges. Most people don't remember what they had for lunch not to mention what they did a month ago.
3. Adjudication judges are qualified for audit due to their training on voter intent and implementation of those rules.

4. Clarification on this rule on why and NOT seeing the relevance to this rule change.

Thank you very much for any consideration with these matters.

Sincerely

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