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To: [SoS Rulemaking](#)
Subject: [EXTERNAL] Written Comments - Proposed Rulemaking for Elections
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Below are written comments for the Proposed Rulemaking for Elections As Filed On 08152025

1. The majority of these new rules make elections harder, not easier. Colorado counties are struggling to keep up with rapidly changing election rules. In particular, the consistent increase in requirements for VSPCs have weakened counties' ability to run smooth elections by forcing our already thinly stretched resources to implement and manage unnecessary equipment and materials and polling centers. Colorado is a mail ballot state, but the SoS and legislature continues to act we aren't. The turnover rate amongst election workers is at an all time high. The SoS should be making rules to make our jobs easier, not harder.
2. New Rules are especially inconsiderate of small counties. Large counties have dozens, possibly even hundreds, of staff to help run elections. But there are plenty of counties that only have two or three election staff. Some counties even manage all elections with a single person! This is because small, rural counties simply do not have the revenue to support a huge amount of election staff. They don't make millions of dollars in clerk fees from DMV. They don't bring in thousands, hundreds, or even dozens of recordings a day to fund their offices (some counties are lucky to even get a single recording/day). And small counties often do not have the tax base to afford staff for specialized roles. Yet clerks are expected to be experts on elections, DMV, recording, liquor licensing, and whatever other job their small county has them do.
3. 7.8.12 should have a small-county exemption, or be removed entirely. Small counties are already spending thousands of dollars a year to have equipment that is never used. ICX machines, for example, are virtually never actually used by people with disabilities. They sit as a giant paperweight, yet they add an enormous amount of complexity to a VSPC. The VSPCs in small counties are lucky to receive more than a couple dozen voters in an entire election. This new rule is a solution in search of a problem, and is totally unnecessary, particularly for counties that will never use this equipment. All it will do is further complicate elections in smaller counties and further drive away those interested in serving our democracy. But it's not just small counties. Large counties too are overburdened with the SoS wanting our elections to be all vote by mail while also having all the rules and equipment of an in-person election.
4. 7.9.4 should have a small-county exemption. In counties with only 1-5 election staff, it is totally unnecessary to require a "accessibility coordinator". The rule needlessly complicates elections for smaller counties.
5. 7.7.15 should be implemented with small-counties in mind. The rule should require the SoS to provide an easy process that does not substantially increase duties for county clerks. A batch-process added in SCORE, for example, could be run alongside other batch printing processes that would make implementation seamless. As written, however, it appears to be just another item on the county clerk's plate that makes it harder to run an election.
6. 7.8.5 should have an exemption for small counties, or be removed entirely. Unlike larger counties, which will have an election judge at every set in the process, Many smaller counties will have only a few election judges that have to be able to do

everything. It's one thing to require VSPCs to have multiple forms of voting available, but making a rule that requires election judges to offer them all, really? Counties are already having a difficult time recruiting election workers, and adding unnecessary rules that will potentially penalize election workers is a step in the wrong direction.

7. 10.6.1 (c) Is this really necessary? Write-in candidates are still valid candidates (assuming they followed the process to become a write-in candidate), and write-in votes are still valid votes. The extra language seems like it is just legal bloat that doesn't actually serve a function.
8. 16.1.3 - THANK YOU! We've been struggling with UOCAVA issues for a while, this is a step in the right direction.
9. 16.1.3 (c) should be implemented with small-counties in mind. The rule should require the SoS to provide an easy process that does not substantially increase duties for county clerks. A batch-process added in SCORE, for example, could be run alongside other batch printing processes that would make implementation seamless. As written, however, it is another item on the county clerk's plate that could make it harder to run an election.
10. 16.1.7 - THANK YOU! We've been struggling with UOCAVA issues for a while, this is a step in the right direction.
11. 20.4.4(c) This is unnecessarily complex and should be removed. Election workers shouldn't have to look like a general from a banana republic (with badges, nametags, keycards, etc all on different places on their body) simply to do their jobs.
12. 7.7.8 should have a small-county exemption, or be rewritten with the consideration of small counties. It is common in small counties that each batch of votes (usually 25 votes) are verified by different judges. While the rule appears neutral on paper, it functionally codifies that clerks in small counties audit 20% of all signatures. Instead of 3% or 5 votes, it should be 3% or one vote per judge. Or a general exemption for counties under 5000 or so voters, that allows an audit to be simply 10% of all signature verification decisions, but not focused on specific judges.