

Andrea Gyger

From: Hall, Hillary <hhall@bouldercounty.org>
Sent: Tuesday, December 08, 2015 12:29 PM
To: SoS Rulemaking
Subject: Comments - working draft election rules

Secretary Williams,

Thank you for the opportunity to comment on the proposed amendments to the Colorado Rules Concerning Elections. The Election Statute Review Committee is submitting a response on behalf of the County Clerk's Association. Members of the committee discussed all of the rules, and the resulting comments are the comments we all supported. Boulder County supports the comments submitted.

I appreciate the majority of the additions and believe the amendments will provide more clarity and better processes in Boulder County. Thank you and your staff for your work on the rules. Boulder County tried many of the suggested practices for both the watchers and signature verification. Although we were able to determine that some of these practices will work well for future elections, we did not have a chance to fully test the impact of the watcher practices because we had very few watchers. (I believe we had two).

I would like to reiterate a position on two proposed rules that exceed your statutory authority. The first is proposed rule 6.2.1. Statute is quite clear that the county clerk appoints election judges, and rule 6.2.1 removes that authority from elected clerks by placing the power to appoint signature verification judges in the hands of the major political parties. My office will work with the parties on appropriate appointments for verification judges. However, if your office would like to change the appointment process, then it should be pursued through the legislature. The second rule that exceeds your authority is proposed rule 8.13. By statute, election judges perform signature verification. If we are going to allow watchers to decide if a signature is valid, then the legislature must make the change in law first.

Thank you again for the opportunity to comment on the amendments you are considering.

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