



July 25, 2016

The Honorable Wayne W. Williams  
Secretary of State  
1700 Broadway  
Suite 200  
Denver, CO 80290

Re: Comments on Proposed Revisions to Elections Rules, 8 CCR 1505-1

Dear Secretary Williams:

Common Cause is a nonpartisan, nonprofit organization that is dedicated to restoring the core values of American democracy, reinventing an open, honest and accountable government that serves the public interest, and empowering ordinary people to make their voices heard in the political process.

The following comments and questions are in response to the Notice of Proposed Rulemaking dated June 15, 2016, as revised on July 20, 2016.

Rule 3.3.3 Insert the word “or” before the phrase “if the organization has not been qualified”.

Rule 8.15.8 This provision appears to be overly broad in its prohibition with regard to cell phones. There are already prohibitions on use of a cell phone by a watcher to make or receive calls (Rule 8.15.6), use of a cell phone to take or record pictures, videos or audio (Rule 8.15.7) and prohibitions on disclosing or recording confidential voter information (Rule 8.15.9). This additional rule would seem to require watchers to deposit cell phones somewhere in the polling or counting facilities while they are engaged as a watcher. It is not clear that this additional level of restraint is necessary.

Rule 18.5.2(B) It does not seem that this rule is properly placed. As proposed, it falls under the heading “Resolution of Blank Ballots”, but may be a rule with broader application, and indeed may have the least application on a blank ballot.

Thank you for the opportunity to comment on these proposed rules. If you have questions, or would like additional information, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Steele". The signature is written in a cursive style with a large initial "E".

Elizabeth Steele  
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Colorado Common Cause  
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