

**From:** [Kyle Rulli](#)  
**To:** [SoS Rulemaking](#)  
**Cc:** [Merlin Klotz](#); [Codie Winslow](#); [Tyler Dean](#)  
**Subject:** Douglas - Comments - working draft Election rules  
**Date:** Tuesday, July 30, 2019 3:07:05 PM

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Dear Secretary Griswold,

Douglas County is submitting the following comment on proposed rule:

**Rule 20.5.4**

(A) ALL VENDORS WHO CONDUCT WORK ON ANY COMPONENT OF A COUNTY'S VOTING SYSTEM MUST CONDUCT A CRIMINAL BACKGROUND CHECK ON EACH EMPLOYEE PRIOR TO THE EMPLOYEE'S WORK WITH THE VOTING SYSTEM. THE VENDOR MUST AFFIRM THAT THE CHECK WAS CONDUCTED IN WRITING TO THE SECRETARY OF STATE PRIOR TO THE EMPLOYEE CONDUCTING ANY WORK. ANY PERSON CONVICTED OF AN ELECTION OFFENSE OR AN OFFENSE WITH AN ELEMENT OF FRAUD IS PROHIBITED FROM WORKING ON ANY COMPONENT OF A COUNTY'S VOTING SYSTEM.


Douglas County fully understands the need for this rule to ensure the safety of our voting systems and their components to have a proactive check on the vendors who are conducting service on them.

We believe this proposed rule is restricting to allowing service of a component of the voting system during critical time periods. Due to the advent of the use of COTS hardware, some vendors utilize contractors to complete field repairs and those contracting companies are not who we are in contact with to schedule the initial service. While many of us know our preventative maintenance service representatives, those emergency time periods can introduce someone new, and acquiring a background check could cause delays in processing.

We would request a clarification of the Secretary of State's proposed procedures for acquiring this information going forward with the voting system vendors, their third party vendors, and their contractors.

Thank you,

**Kyle Rulli**

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